

Wolverhampton Local Plan

Spatial Strategy Topic Paper

Examination in Public

July 2025



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1. Introduction

1.1 In June 2025, at the initial stages of the Wolverhampton Local Plan (WLP) Examination in Public, the appointed Inspectors provided initial questions to Wolverhampton City Council (WCC), which included the request for a succinct topic paper on development of the spatial strategy, which:

- demonstrates how the chosen spatial strategy of balanced and sustainable growth evolved and was decided upon;
- includes clarification and justification for the approaches taken to Green Belt and the Wolverhampton City Centre area;
- includes an explanation of how any potential transport (particularly highways) impacts, resulting from the proposed spatial strategy and the location of site allocations, have been assessed, including in relation to neighbouring authorities;
- an explanation of how any potential air quality related impacts on protected sites, resulting from the proposed spatial strategy and the location of site allocations, have been assessed, including in relation to neighbouring authorities.

2. Background and National Policy Transitional Arrangements

2.1 All local authorities are required to develop a long term plan that sets out how and where land can be developed over at least the next 15 years, to meet the growing needs of local people and businesses. The Development Plan for an area is made up of strategic policies (which address the strategic priorities for an area) and non-strategic policies (which deal with more detailed matters).

2.2 The WLP contains strategic planning policies and land allocations and targets to support the growth and regeneration of the City of Wolverhampton up to 2042. The WLP sets out a vision and strategic priorities and a spatial and policy framework for delivery. This framework will guide and shape development across Wolverhampton and set clear parameters for growth and transformation. The policies and proposals will be used to help make planning decisions and guide investment and regeneration in Wolverhampton.

2.3 The WLP provides a strategy for bringing land forward with a clear presumption in favour of sustainable development. It provides certainty and transparency to residents, businesses and developers about how the city is expected to grow up to 2042.

2.4 The WLP makes housing and employment development allocations for the whole of Wolverhampton, except for Wolverhampton City Centre, the boundary of which is shown on Figure 2 of the WLP Regulation 19. The WLP sits alongside non-strategic policies for Wolverhampton provided in the

saved parts of the Wolverhampton Unitary Development Plan (2006), and Area Actions Plans for Bilston Corridor, Stafford Road Corridor and Wolverhampton City Centre. The policies in these Development Plan Documents, (together with national policies and policies in the Neighbourhood Plans for Tettenhall and Heathfield Park) provide the set of rules against which planning applications in Wolverhampton are assessed.

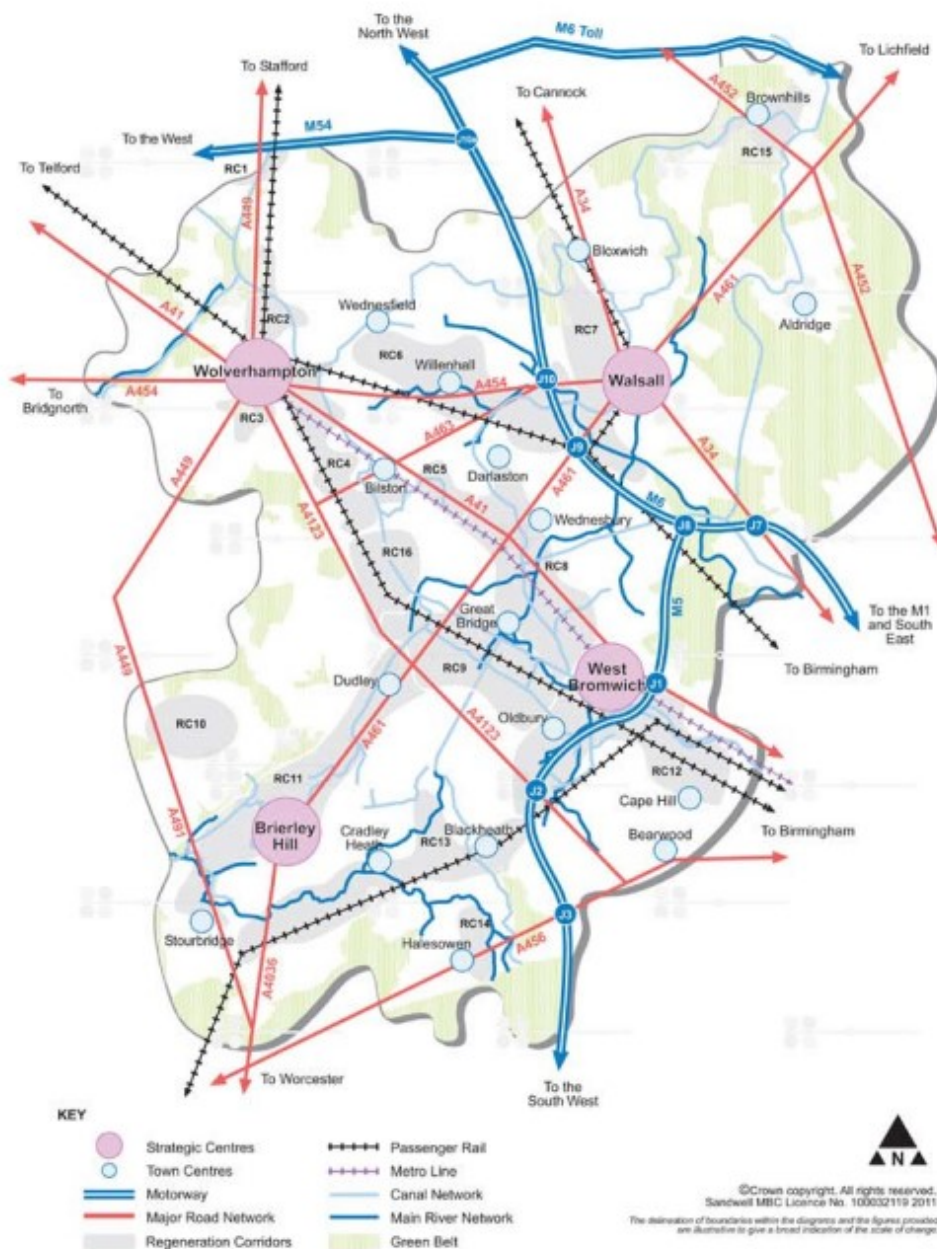
- 2.5 The Wolverhampton Local Development Scheme 2025-28 (LDS) [Submission Document (SD) CD12] para 3.7 recognises that there may be a need to provide additional planning guidance for some sites in Wolverhampton City Centre in order to provide additional clarity for decision making. The LDS recognises that, subject to the detailed requirements of the new national planning system, there are a range of options open to the Council in terms of the most appropriate vehicle to provide this guidance. The LDS currently proposes the preparation of a Wolverhampton City Centre Supplementary Plan under the new national planning system in order to provide any additional housing allocations consistent with the WLP strategic approach. A Wolverhampton City Centre Masterplan is currently being prepared and programmed for completion in early 2026. This will provide up-to-date, detailed evidence to underpin any future Plan covering the City Centre.
- 2.6 The WLP is being prepared in line with the transitional arrangements set out in the National Planning Policy Framework (NPPF) 2024, and therefore the policies in the 2023 version of the NPPF apply to the WLP.
- 2.7 When preparing a Local Plan, the NPPF requires local authorities to identify all reasonable options for the overall levels of growth, the spatial strategy and site allocations. Site assessment work informs the development of a spatial strategy. As part of this, and to ensure that the most appropriate sites are chosen, there is a need to test reasonable alternatives. This is in accordance with the sustainability appraisal work that is needed to ensure a plan is sound. The sustainability appraisal needs to assess options, both in terms of higher level growth and spatial strategy options, and also more detailed site and policy options.
- 2.8 The WLP spatial strategy has not been prepared in isolation – it represents the continuation of an evolving process which began with preparation of the Wolverhampton Unitary Development Plan (UDP) 2006 [SD DP5], and which has extended to a consideration of the wider Black Country sub-region through the Black Country Core Strategy (BCCS) 2011 [SD DP1]. This process is set out in section 3 of this Topic Paper.

3. An Evolving Spatial Strategy for Wolverhampton

The Wolverhampton UDP and Black Country Core Strategy: 2006-16

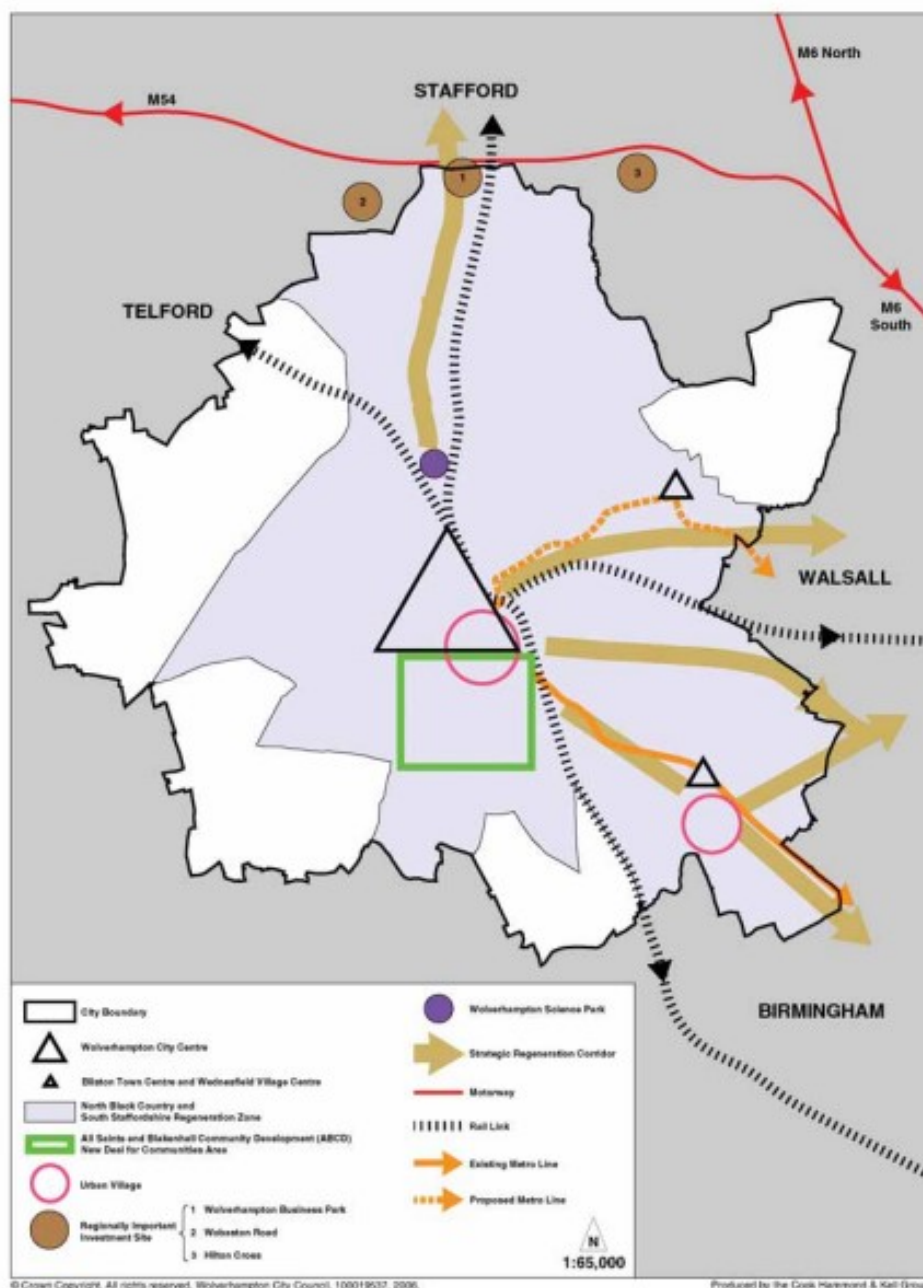
- 3.1 The BCCS spatial strategy, which is illustrated on the Key Diagram below, focuses development in four Strategic Centres (including Wolverhampton City Centre) and sixteen Regeneration Corridors, whilst protecting the character and environmental value of existing residential and green belt areas. The BCCS Appendix 2 [SD DP1b] provides mini spatial strategies and development targets for each of the Strategic Centres and Regeneration Corridors.

Black Country Core Strategy Key Diagram



- 3.2 The BCCS spatial strategy broadly represented a continuation of the Wolverhampton UDP spatial strategy of Wolverhampton City Centre and northern and eastern Strategic Regeneration Corridors (see below), with a move towards higher housing densities and more housing development forecast to be released on surplus low quality employment land focused around the transport and canal network. The BCCS was prepared as the country was emerging from the global recession of 2008, and the Black Country was recovering from a period of economic and population decline. Therefore, the BCCS anticipated significant recycling of industrial land for housing.

Map 2.1 Wolverhampton Area Development Framework Key Diagram



- 3.3 The BCCS provided the strategic spatial and policy framework for the three Wolverhampton Area Action Plans (AAPs) [SD DP2, DP3, DP4], which were prepared during 2012-2016. The AAPs defined local policies and housing and employment development site allocations for the parts of Wolverhampton where regeneration and growth would be concentrated – Stafford Road Corridor; Bilston Corridor and Wolverhampton City Centre. The Wolverhampton City Centre AAP covered Wolverhampton City Centre, as defined in the UDP, and also Regeneration Corridor 3: South of Wolverhampton City Centre.
- 3.4 As the AAPs were prepared, detailed evidence collection and site owner engagement took place for significant areas of occupied employment land within the Regeneration Corridors. As part of this process, it became clear that there was less potential for release of employment land for housing than had been anticipated when the BCCS was prepared.

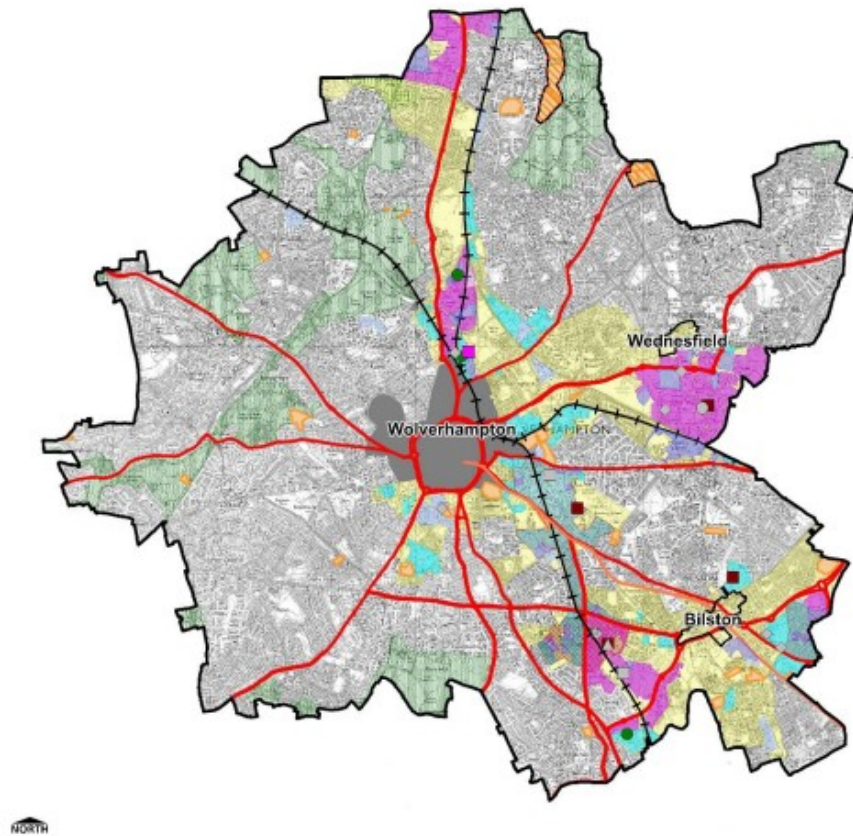
The Black Country Plan: 2016-22

- 3.5 The Black Country Authorities (BCAs) began a review of the BCCS in 2016 (called the Black Country Plan – BCP), to roll forward the plan and address changes that had taken place since 2011. The population and economy were growing and there was a need to identify additional housing and employment sites beyond the capacity of the BCCS. There had been several changes to national planning policy and the national economic situation had also changed. As referenced in para 3.4 above, the manufacturing and industrial markets of the Black Country had remained stable, and expanded in some cases, meaning that the significant supply of vacant brownfield land for development expected by the BCCS had not occurred at scale. This resulted in a reduced supply of deliverable and developable housing land over time, as set out in the Black Country Urban Capacity Review Update 2020 [SD HO6].
- 3.6 The BCP process began with an Issues and Options Consultation and Call for Sites in 2017 [SD PC18]. The BCP scope was wider than the BCCS, including a green belt review and detailed site allocations for housing and employment development across the Black Country, excluding the Strategic Centres. This exclusion was necessary and appropriate due to the complexity and unique nature of issues affecting each Strategic Centre, and recent / parallel work taking place to make detailed allocations in the Strategic Centres. At the time, the Wolverhampton City Centre AAP had recently been adopted in 2016, providing an up-to-date spatial strategy, area specific policies and site allocations for the City Centre.
- 3.7 The Covid-19 pandemic of 2020–21 caused a significant shift in the way Black Country residents work, shop and access services, bringing about some longer term changes to the ways communities operate that may have implications for land uses which need to be addressed through robust yet flexible policies.

- 3.8 In 2021, consultation took place on a Draft BCP [SD PC7], which took into account Issues and Options consultation responses and a range of evidence including Sustainability Appraisal of a range of options.
- 3.9 The Draft BCP spatial plan for Wolverhampton (reproduced below), reflected an evolution of the BCCS spatial strategy for the urban area, with Regeneration Corridors – composed mostly of employment land – broadened to form Core Regeneration Areas, which covered a wider range of land uses. This evolution reflected the changing evidence base and associated distribution of brownfield development opportunities, and more recent regeneration priorities.
- 3.10 At this point, a new Core Regeneration Area covering Wednesfield was introduced, to reflect: the emergence of the Walsall to Wolverhampton Growth Corridor as a priority for investment in the West Midlands Housing Deal; the ongoing transformation of the Heath Town Estate; employment development opportunities in the Wednesfield Employment Area; and A454 Eastern Gateway transport enhancement opportunities. The Wolverhampton City Centre boundary was also adjusted to remove the Royal Hospital Development Area, to the south east of the ring road, as this site was substantially complete and had a character more in keeping with the adjoining All Saints residential area.
- 3.11 The spatial strategy also involved increases in housing density levels beyond those set in the BCCS, reflecting more recent trends. Limited Neighbourhood Growth Areas in the north east of the City reflected areas proposed for green belt release for housing. The total growth outputs were 12,100 homes and 65 ha employment development land for the period 2020-39, of which 1,014 homes were proposed on green belt release sites. The Draft BCP as a whole proposed 7,720 on green belt release sites and produced a housing shortfall of 28,239 homes.

Figure 21 - City of Wolverhampton Spatial Plan

Black Country | Plan
Planning for the future of the Black Country



Wolverhampton Spatial Strategy



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3.12 A number of consultation respondents raised concerns about the proposed release of land from the green belt for development, whilst others questioned whether the brownfield first approach could, alone, deliver sufficient capacity to meet needs. The consultations also demonstrated that there was support for housing to be built in sustainable locations and a desire to protect the environment of the Black Country. A summary of the key issues raised in the Draft BCP consultation is set out in the WLP Consultation Statement [SD PC5].

4. The Wolverhampton Local Plan: 2022-2025

- 4.1 In October 2022 it was decided not to take forward the BCP, and the BCAs instead pursued separate Local Plans, with differing approaches to site allocations to meet identified needs. However, there continued to be joint working across the Black Country on a number of planning issues, particularly transport and air quality impacts on protected sites, and some of the joint evidence prepared to support the BCP is still relevant to the WLP.
- 4.2 In December 2022, the Government consulted on significant changes to the NPPF with potential to have major impacts on the development of a Wolverhampton Local Plan. Therefore, work on the Local Plan was paused whilst the NPPF consultation results were awaited. In the event, this took longer than anticipated, with the new NPPF being published in December 2023. WCC then immediately began work on the WLP Issues and Preferred Options report, relying in large part on the work carried out to prepare the BCP, gaining Cabinet approval for consultation in February 2024.

WLP Issues and Preferred Options (Regulation 18)

SCOPE – WOLVERHAMPTON CITY CENTRE AND GREEN BELT

- 4.3 The proposed scope for the WLP, consulted on as part of the Issues and Preferred Options Report (I&PO) [SD PC2] in February 2024, reflected an urgent need to review and update Wolverhampton strategic policies and site allocations, for the following reasons:
- The large and increasing shortfall between housing and employment land needs and available development land; and
 - The need to bring forward a strategic plan before 2025, when local plan system changes were expected to come into effect through implementation of the Levelling Up and Regeneration Bill.
- 4.4 To progress the WLP as quickly as possible, it was important to build on the extensive work that had taken place recently to develop the BCP. This meant making use of existing evidence, draft policies and responses made to the Draft BCP consultation, where these were still relevant.
- 4.5 To facilitate this, it was proposed to progress the WLP on the basis of almost the same scope as the BCP – covering all strategic policies for Wolverhampton, and all housing and employment allocations except for sites within Wolverhampton City Centre. This gap was intended to be filled by a review of the Wolverhampton City Centre AAP to provide up-to-date site allocations for the city centre area, if required (see also para's 2.5 and 3.9 above).

Green Belt

- 4.6 The main difference in scope between the BCP and the WLP was the approach to green belt review, driven by changes to the NPPF, as set out below. Wolverhampton is a densely developed urban area, with small areas of green belt on the fringes. Most of the sites in the urban area which were proposed for allocation for housing and employment use in the Draft BCP were still considered suitable to include in the WLP. A continual “call for sites” in Wolverhampton had been open through the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) for over ten years. Since consultation on the Draft BCP, the SHLAA process had generated some new sites suitable for housing, which were included in the consultation. The I&PO consultation promoted and encouraged the submission of any further sites through the “call for sites” process.
- 4.7 As of 2024, even taking into account all suitable and deliverable sites in the urban area, uplifting housing densities and including housing windfall allowances and an ambitious estimate of the housing capacity of Wolverhampton City Centre, there were still significant shortfalls of development land for housing and employment use over the Plan period, and a shortfall of gypsy and traveller pitches. In particular, the housing shortfall was in the order of 11,400 homes.
- 4.8 The WLP has been prepared under the December 2023 NPPF, as set out in para 2.6 above. At the heart of the NPPF is a presumption in favour of sustainable development which is detailed in paragraph 11. For plan-making purposes, this means that: *“b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷...”* Footnote 7 clarifies that the policies referred to include land designated as Green Belt.
- 4.9 In December 2023 there was a key change to national planning policy as set out in para 145 of the NPPF: *“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”*
- 4.10 This is further supported and clarified by the Government response to question 9 of the consultation on the December 2022 NPPF, published on 29 November 2023 ([Government response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation - GOV.UK](#)). This states: *“To support our position on Green Belt, we proposed to make clear that Green*

Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period. Local authorities would still have the ability to review and alter Green Belt boundaries if they wish, where they can demonstrate that exceptional circumstances exist. We proposed this change to remove any ambiguity about whether authorities are expected to review the Green Belt. This has previously caused confusion and often led to protracted debates during the preparation of some plans. ... The revised wording changes respond to the need for greater clarity of the policy intent and now sets out that there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated, but that authorities may however choose to do so. We consider that the revised policy wording now removes any ambiguity about whether authorities are expected to review the Green Belt.”

- 4.11 The changes to para 145 of the NPPF are also supported and clarified by *the* accompanying Ministerial Statement published on 19 December 2023, which states, making clear the political drivers behind the changes: “... *Today’s update to the NPPF addresses the concerns expressed by local elected representatives... It provides clearer protection for the Green Belt These changes meet the clearly expressed, and wholly understandable, wishes of elected politicians of all political parties to deliver for their communities*”. It then goes on to state: “*We seek to support the gentle densification of urban areas in preference to the erosion of Green Belt land. That is why the Government is ensuring it is clear there is generally no requirement on local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing need. Where a relevant local planning authority chooses to conduct a review, existing national policy will continue to expect that Green Belt boundaries are only altered where exceptional circumstances are fully evidenced and justified, and this should only be through the preparation or updating of plans. ...*”
- 4.12 There was also a statement made in the House of Commons by the Planning Minister on 19 December 2023, which included the following: “*We will not impose top down release of green belt land against the wishes of local communities.*” This is again a clear political reference. Therefore, with that background, it is plain that the wording in para 145 should be given its natural and ordinary meaning i.e. that the choice referred to is for the local authority, the elected representatives of the local community, to make. It is therefore not appropriate to apply other parts of the NPPF (e.g. the first sentence of para 11 b); para 60) which apply more generally, to lessen or circumvent the effect of para 145 in this regard.
- 4.13 WCC consider that this change meant that local authorities preparing a Local Plan, which did not have enough suitable land to meet their housing or employment development needs, could now choose whether or not to review the green belt to release land for more housing or employment development.

- 4.14 Wolverhampton is a densely developed and constrained urban area with a small amount of green belt land, forming only 11% of the total land area. Much of this green belt land provides important services for the urban area, such as public open space, education and sports facilities, or is of significant value for wildlife, historic character or landscape character. When the BCP was being prepared under the 2019 NPPF, the Wolverhampton Green Belt was found to have potential capacity for only 1,014 homes, with no areas suitable for employment development or gypsy and traveller pitches.
- 4.15 Taking these factors into account, when commencing preparation of the WLP, WCC chose not to review the Wolverhampton Green Belt to address the housing and employment development shortfalls arising from the WLP, in accordance with para 145 of the NPPF. This choice was made through the Cabinet Report which approved the WLP Issues and Preferred Options Report ([Wolverhampton Local Plan - Issues and Preferred Options Consultation 21 February 2024](#)), as set out in para 3.1 of this report. This means that none of the spatial options which were consulted on involved release of green belt land for development, and no green belt sites were considered for development or assessed as reasonable alternatives throughout the WLP preparation process.
- 4.16 WCC consider that, once this choice had been made for the WLP, NPPF paragraph 146 regarding exceptional circumstances was then no longer relevant to the WLP. This is because paragraph 146 only sets out the circumstances which must be in place should an authority choose to review and alter Green Belt boundaries – and WCC has not made that choice.

SPATIAL OPTIONS

- 4.17 The I&PO identified and consulted on options for the WLP - in terms of the vision and strategic priorities, spatial strategy, policies and site allocations. Given the amount of work undertaken recently on the BCP, it was also possible to select and consult on preferred options for the WLP. All options were subject to Sustainability Appraisal (SA) as set out in the I&PO SA report [SD EN20].
- 4.18 The preferred housing and employment growth options consulted on in the I&PO, which are set out below, are inextricably linked to the spatial options for the WLP, and to the site allocations options. This is because there is a finite amount of land available for development in the Wolverhampton urban area, and this is concentrated in certain locations.

Preferred Growth Options

Type	Description	Assessment
<i>Housing Growth Option (H3)</i>	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: • 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	All of housing need 2024-2042 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
<i>Employment Growth Option (E3)</i>	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: • 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	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.

4.19 The I&PO set out the spatial options considered and an assessment of the advantages, disadvantages and limitations for each option (which relate to those for the housing and employment growth options), as set out below:

Spatial Options

Option	Description	Impact on Growth Options
Option A	“Business as Usual” – retain current housing and employment allocations in urban area and protect green belt.	- As for Option H1 - As for Option E1
Option B	Employment-Led - reconfigure uses in the urban area to promote local employment and mixed use; retain and intensify employment land and protect green belt.	- As for Option H1 but with larger shortfall against housing need - As for Options E2 & E3
Option C	Market-Led – only allocate housing in high demand areas and employment land in most attractive commercial locations	- As for Option H1 but with larger shortfall against housing need - As for Options E2 & E3 but without sites in less attractive commercial locations and therefore larger shortfall against employment land need
Option D	Garden Village / Health Promotion – protect all publicly accessible open space; provide lower density, mixed use housing developments with more on-site open space and residential services	- As for Option H1 but with larger shortfall against housing need - As for Options E2 & E3 but with larger shortfall against employment land need
Option E	Minimise Climate Change Impacts – only develop housing in locations with highest sustainable transport access to residential services, and only locate new employment land where good public transport access.	- As for Options H2 & H3 but with larger shortfall against housing need - As for Options E2 & E3 but without sites where not good public transport access and therefore larger shortfall against employment land need
Option F	Infrastructure and Regeneration-Led – Focus development in the central, north and east urban area of Wolverhampton, where development and infrastructure opportunities are concentrated and regeneration benefits can be maximised.	- As for Options H2 & H3 but with larger shortfall against housing need - As for Options E2 & E3
Option G	Balanced and Sustainable Growth – Focus development in the central, north and east parts of Wolverhampton, to minimise climate change impacts, make best use of existing infrastructure and support urban regeneration. Key features: increased housing density in the most accessible locations; more housing in Wolverhampton City Centre.	Preferred Option: - As for Options H2 & H3 - As for Options E2 & E3

4.20 The Preferred Option G: Balanced and Sustainable Growth was chosen because it effectively forms an appropriate balance between the other six options and is the option which has the most potential to:

- provide sufficient land to meet Wolverhampton housing needs up to 2042 (both within Wolverhampton and in neighbouring authorities);

- provide sufficient employment land within Wolverhampton to meet employment land needs for Wolverhampton up to 2042 and allow Duty to Cooperate requirements to be met for the Black Country FEMA; and
 - meet national guidance on sustainable development by providing a highly sustainable pattern of development.
- 4.21 The preferred spatial option translates into the proposed key spatial diagram set out in the I&PO (replicated below); the proposed spatial distribution of housing and employment development in Table 3 (replicated below); and the proposed site allocations set out in part d. Site Allocations of the I&PO. The proposed spatial strategy was broadly consistent with the Draft BCP spatial plan, with the exception of the limited Neighbourhood Growth Areas (see para 3.11).

Plan 1 Proposed Key Spatial Diagram

-  Wolverhampton City Boundary
-  Railway
-  Metro
-  Motorway
-  Strategic Transport Investment - A454 City East Gateway
-  Strategic Transport Investment - City Centre Public Realm & Cycling
-  Green Belt
-  Existing Employment Areas
-  Town Centres
-  Wolverhampton City Centre
-  Bilston Regeneration Area
-  Stafford Road Regeneration Area
-  Wednesfield Regeneration Area
-  Significant Housing Development (100+ homes)
-  Significant Employment Development (>1 hectare)

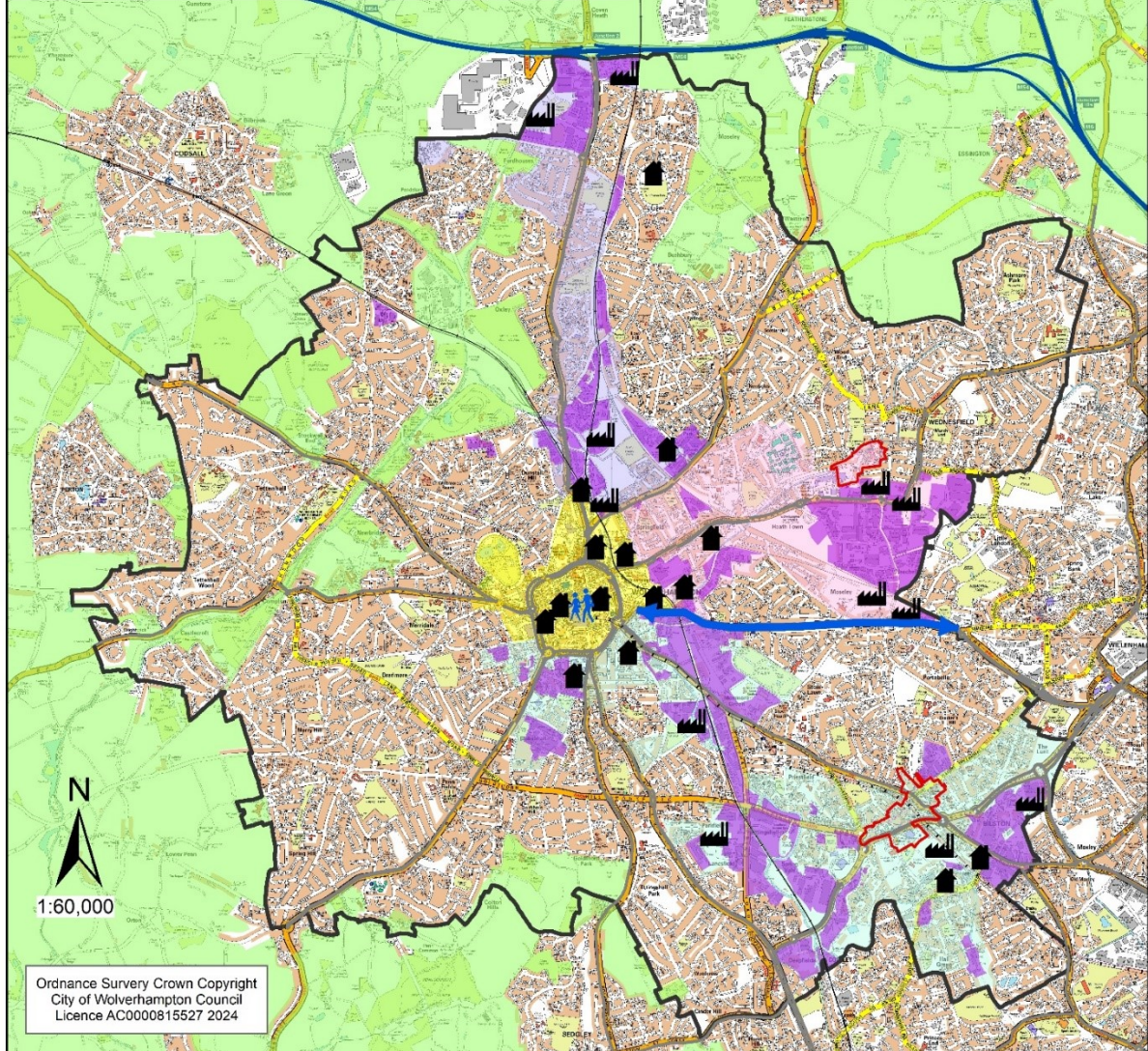


Table 3 Proposed Spatial Distribution of Housing and Employment Development Land (2022-42)

Location	Housing (net homes including discount)	Employment Development Land (ha)
Wolverhampton City Centre	Identified Sites: 3227 Small Windfalls: 225 Flexible AAP Allocations: 460 Structural Change Surplus Floorspace: 184 Structural Change Potential New Allocations: 440 = 4536 (44%)	0
Bilston Core Regeneration Area	1391 (14%)	20 (38%)
Wednesfield Core Regeneration Area	553 (5%)	15 (29%)
Stafford Road Core Regeneration Area	290 (3%)	17 (33%)
Growth Network	6770 (66%)	52 (100%)
Neighbourhoods Area (identified sites)	1767 (17%)	0
Small Windfall Housing Sites (<10 homes) outside Wolverhampton City Centre	1770 (17%)	-
Total	10307	52

SUSTAINABILITY APPRAISAL

4.22 The I&PO Sustainability Appraisal [SD EN20] concluded that it was difficult to determine an overall best performing spatial option, as the performance of each option varied depending on the SA Objective in question. Generally, options which perform better against meeting development needs would also put the most pressure on environmental resources and social facilities. The worst performing option was identified as Option C, as did not perform best against any SA Objectives. Options A and B performed joint best against the most SA Objectives, however these strategies would lead to a housing shortfall. Option G is the only option that would satisfy both the identified housing and employment needs, whilst also attempting to strike a balance between retaining valuable environmental assets and prioritising development in more accessible locations which facilitate sustainable transport.

CONSULTATION RESPONSES

4.23 The WLP Consultation Statement Publication Plan (Regulation 19) [SD CD9] provides a summary of responses to the I&PO consultation. 63.2% of respondents agreed with the Preferred Spatial Option for the WLP and 21.8% disagreed. The detail of responses made on the Preferred Spatial Option are provided on pages 58-64, and summarised below:

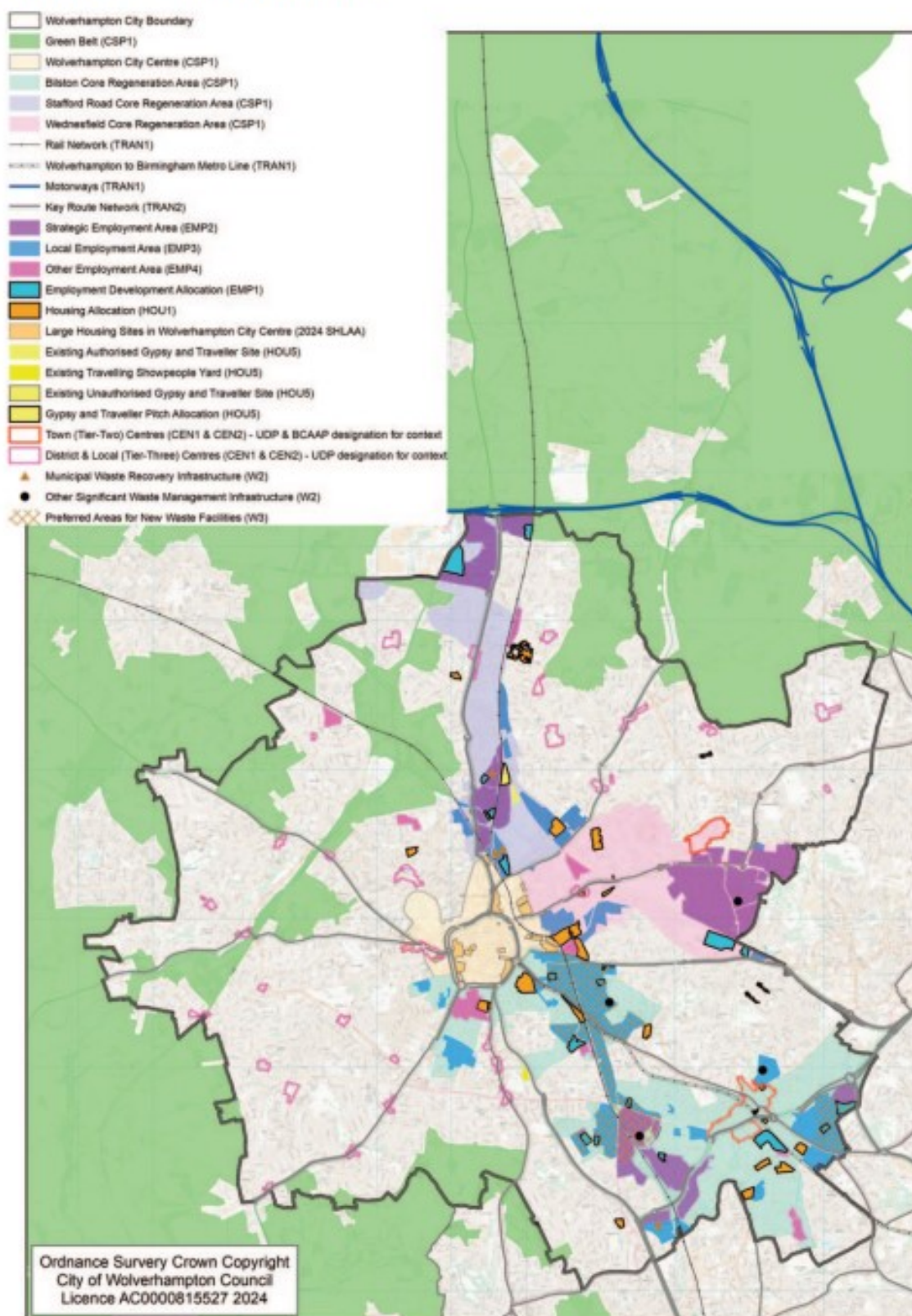
- support urban-led approach with increased densities, which focuses growth close to public transport corridors, services and employment opportunities;
- support protection of green belt;
- concern that densities should not be too high;
- WLP should do more to meet its own housing needs, including through green belt and greenfield land release, as this is more sustainable than export;
- Preferred Spatial Option is over-reliant on complex, constrained, brownfield and high density city centre sites, which will not address local need for 3+ bed houses and affordable homes.

WLP Regulation 19

4.24 The preferred growth and spatial options consulted on at I&PO stage were subsequently taken forward in the WLP Regulation 19 [SD CD1], following amendments to update housing and employment figures to 2024.

4.25 The preferred spatial option is expressed in the WLP Spatial Strategy, which is detailed in Policy CSP1 and illustrated in Figure 1 (replicated below), and provides the overarching basis for the Plan's proposals for growth and infrastructure improvements. The Spatial Strategy is composed of a Growth Network made up of Wolverhampton City Centre and three Core Regeneration Areas, the Neighbourhoods Area, where most residents live, and the Green Belt. Table 3 sets out the spatial distribution of housing and employment development across the growth network, in line with the Spatial Strategy and associated site allocation information set out in Table 12 of Section 13.

Figure 1: Spatial Strategy Key Diagram



4.26 Para 3.5 supporting the Policy explains that the spatial strategy has been developed through a comprehensive assessment of a range of seven alternative spatial options, as set out in the I&PO, and corresponds to Spatial

Option G – Balanced and Sustainable Growth. “The Sustainability Appraisal demonstrated that this spatial option will enable Wolverhampton to meet a significant proportion of its growth needs in a way that takes full account of environmental, climate change, accessibility and social requirements. By promoting the right type and amount of development in the most sustainable locations, the Strategy therefore plays a crucial role in delivering an inclusive Wolverhampton that supports communities to achieve their goals.”

- 4.27 Para’s 3.7 - 3.9 explain that the WLP forms an essential part of the Our City: Our Plan Vision, supporting the re-energising, diversification and re-purposing of the city centre, supporting the recovery and growth of the economy, and providing for a continuous supply of new homes to meet the needs of local and wider communities. At the same time, the Plan will protect key environmental assets – the green belt, the network of high quality green and blue spaces, and local character and heritage - and support delivery of 9,330 new homes and 42.9 ha of employment land by 2042. To plan for this growth, locations that are both sustainable and deliverable have been prioritised. Development and investment will be focussed on Wolverhampton City Centre and three Core Regeneration Areas, and growth supported by transport investment focused on enhancing the rail and rapid transit network and the key road corridors and investment in walking and cycling. Development will help to green the city, by increasing tree cover and providing biodiversity net gain and will help to deliver priority environmental improvements to ensure residents have easy access to a range of healthy recreation opportunities.
- 4.28 Para’s 3.10 – 3.43 provide a detailed description of each element of the spatial strategy, including Wolverhampton City Centre. Policy CSP1 and Table 3 set out a strategy and deliverable development targets for the City Centre, based on up-to-date detailed evidence – including a housing target of 4,676 homes. Para 3.16 explains that: “This evidence provides a sound basis to understand the housing capacity of the city centre for the purposes of the WLP and will be updated and further tested in detail when the AAP is reviewed to provide up-to-date site allocations for the city centre. The Blakenhall and Graiseley and All Saints Character Areas of the AAP fall outside the Wolverhampton City Centre boundary, therefore AAP development allocations in these areas have been replaced through the WLP (see Appendix 1).”

5. How Potential Transport Impacts have been assessed

- 5.1 This section provides an explanation of how any potential transport (particularly highways) impacts resulting from the proposed spatial strategy and the location of site allocations, have been assessed, including in relation to neighbouring authorities.

Black Country Local Plan Transport Modelling

- 5.2 Black Country transport modelling was undertaken by consultants as evidence to support the BCP [SD TR2]. This involved modelling the most up-to-date proposed site allocations for all four BCAs together, to ensure the wider impacts of travel demand were understood.
- 5.3 After work on the BCP ended, in October 2022, the BCAs and the Black Country Transport Group commissioned refreshed Black Country transport modelling to support the WLP and the Dudley and Sandwell Local Plans, following the same methodology as that used for the BCP. The updated modelling work was carried out to ensure that new emerging local plans for the BCAs were sufficiently modelled, where possible, to provide an understanding of traffic levels across the Black Country up to 2042. Other authorities and bodies were involved as appropriate during the work.
- 5.4 Following a review of the BCP transport modelling, key updates were required to ensure robustness and follow latest Department for Transport - Transport Analysis Guidance (TAG). As set out in SD TR1e, the key recommendations were to use updated:
- site allocations
 - model network
 - reference case model demand
 - national modelling guidance (TAG)
- 5.5 Following the review, Sweco were commissioned to undertake the refreshed Black Country Local Plan Transport Modelling [SD TR1, TR1a & TR1b]. This modelling work informed the WLP Regulation 19, and tested the “worst case” scenario of potential transport (particularly highways) impacts resulting from the proposed spatial strategy and the location of site allocations.
- 5.6 While the modelling was undertaken at a Black Country level, results and proposed mitigation measures were reported on a local authority basis. A summary of the impact on the Wolverhampton highway network is provided in section 6.2.5 of SD TR1. Overall, small areas of increased delay and demand were identified, but generally it was found that the highway network would be able to cope with the additional demand generated through the proposed site allocations, with some key corridors possibly requiring additional mitigations to cope with increased demand.

- 5.7 New transport scheme development across the Black Country is typically focussed on public transport and active travel schemes, and the impacted corridors are currently being developed for improved active travel infrastructure. However, due to the strategic nature of PRISM (the model used for the assessment) it was unable to reflect demand changes from private vehicles to active travel, and therefore the results and subsequent impacts should be viewed as an absolute worst case scenario. The expectation is that improved active travel facilities and public transport provision will encourage more sustainable modes of travel to and from the proposed developments.

Neighbouring Authorities

- 5.8 Section 6.2.7 of SD TR1 explains that PRISM is only intended to be used to model policies within the West Midlands. The model network and zoning system becomes less detailed outside of these areas, and so it is not able to predict finer traffic movements and interactions. This is particularly relevant for authorities that share a boundary with the Black Country. There are likely to be regular trips between the BCAs and districts beyond this area, such as Staffordshire and Worcestershire. The impacts of the proposed Local Plans on the roads leading out of the study area and into these neighbouring districts, and across the rest of the West Midlands, is expected to be minor. However, no firm conclusions can be drawn on the impacts of the proposed Local Plans outside of the boundaries of the PRISM study area. Whilst the GIS plots presented in SD TR1 have been trimmed to only cover the Black Country, with a 1km buffer around it to capture the routes into the four BCAs, the full PRISM model covers the rest of the West Midlands conurbation, the wider Midlands region, and the rest of the UK in decreasing detail. Network performance outside the Black Country has been checked to ensure there are no unexpected wider impacts and that routing is generally sensible and proportionate.
- 5.9 Therefore, within the confines of the WLP development programme and the need for refreshed modelling, the modelling could only consider wider neighbouring local authority impacts for areas that are within the fully modelled area (FMA) of PRISM i.e. the BCAs only. It was not possible to update the PRISM model to move Staffordshire into the FMA within the available time and budget. However, all major corridors leading towards Staffordshire within Wolverhampton (including Stafford Road) were included as part of the assessment.
- 5.10 Following the WLP Regulation 18 response from Staffordshire County Council [SD CD15 p.22], a separate Transport Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC), Staffordshire County Council, National Highways (NH) and WCC was completed in October 2024 [SD CD15e] to support the South Staffordshire Local Plan, and these bodies did not subsequently make any response to the WLP Regulation 19 consultation regarding highways impacts / transport modelling. The general

SoCG between WCC and SSDC [SD CD15 Appendix 6] also states: "**Cross boundary transport impacts:** SSDC and CWC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. All parties have worked closely together to agree the scope, content and indicative mitigation measures relating to the strategic transport assessments undertaken on SSDC's proposed strategic housing and employment site allocations. As these sites progress the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate."

- 5.11 NH submitted a response to Sandwell Local Plan [SD TR1c] which raised various issues regarding the Black Country Local Plan Transport Modelling, and a response which addresses the issues was then published [SD TR1d]. NH have since confirmed that they have no fundamental concerns with the modelling work, as set out in the letter from Sandwell Council to NH dated 21/03/25 to support the Sandwell Local Plan ([Sandwell to NH letter 210325](#)).
- 5.12 At WLP Regulation 18 stage, Worcestershire County Council raised concerns over the potential cumulative transport impact of WLP development on the network in Worcestershire and unknown implications of DtC exports, particularly as the County Council had not been involved in the BCA transport modelling and the PRISM model does not extend to northern-most extents of Worcestershire's highway network. They requested more information on / involvement in transport evidence and infrastructure strategy and asked for consideration to be given to planning adequate transport infrastructure, including any necessary capacity improvements in Worcestershire to provide for cross-boundary movements. These issues were dealt with through subsequent email correspondence and a meeting on 6 January 2025 (as set out in the Duty to Cooperate Topic Paper [Examination Document WCC5]).

Site Assessment Report and WLP Site Allocation Process

- 5.13 The Site Assessment process for both the BCP and WLP included two specific transport-related criteria: Highway Access and Transportation, and Impact on Wider Road Network (linked to the Black Country Local Plan Transport Modelling), as set out in SD SI1 pp.18-19. Proposed development sites were rated green, amber or red depending on the level of access constraint; likely highway safety impacts; and acceptability of wider road network impacts taking into account mitigation. The process also provided a specific rating for access time by walking or public transport to key residential services (relating directly to WLP Policy HOU2: Housing Density, Type and Accessibility), and for connections to the local cycle route network. These criteria were designed to channel development into the most accessible locations and / or deliver appropriate mitigation measures to maximise sustainable transport access.

- 5.14 The site allocation process for the WLP Regulation 19 involved drawing together various strands of evidence relating to transport impacts, including the Site Assessment results, the SHLAA 2024 deliverability commentary for each major site, results of the Black Country Transport Modelling and the views of WCC Highways Officers. The results are presented in WLP Regulation 19 Table 12 of Section 13, which sets out site policies with specific policy requirements for each site allocation.

6. How Potential Air Quality Impacts on Protected Sites have been assessed

- 6.1 This section provides an explanation of how any potential air quality related impacts on protected sites, resulting from the proposed spatial strategy and the location of site allocations, have been assessed, including in relation to neighbouring authorities. For further detail, please refer to the Statement of Common Ground for the Air Quality Partner Authorities and Natural England Position at December 2024 [SD CD15a]; the WLP Submission Habitats Regulations Assessment March 2025 [SD CD21]; and the WLP Duty to Cooperate Statement Submission March 2025 [SD CD15 pp.33-34].
- 6.2 The Cannock Chase Special Area of Conservation (SAC) Partnership is a partnership between organisations who have legal responsibilities in relation to the Cannock Chase SAC ([Cannock Chase SAC Contributions System | City Of Wolverhampton Council](#)). The purpose of the partnership is to ensure that the ecological integrity of the SAC is maintained and all legal obligations in relation to the SAC are met. The Partnership is funded by mitigation contributions collected by seven local authorities from new housing development within 15km of Cannock Chase. These contributions fund both the Partnership and a series of works which mitigate the increase in recreational activity arising from new development.
- 6.3 The interest features of a number of European Sites within and close to the Partnership area are recognised as being sensitive to increased air pollution. Any new development could increase air pollution on European Sites, either directly, through emissions from the development during its operational life (e.g. industrial units, livestock housing units, energy generation) or indirectly, through a significant increase in the scale of vehicular movements on roads within 200m of a European site in the construction and /or operational phases.
- 6.4 Since being made aware of this potential issue in 2019, the Partnership has undertaken a number of actions to ascertain the likely impact of nitrogen oxides (NOx) emissions and their contribution to nutrient nitrogen deposition on the SAC designation to 2050. In May 2020, the Partnership proposed a strategic solution to the nitrogen issue; 'A road map to mitigation scheme' and commissioned evidence in the form of an air quality assessment to determine the likely scale of air pollution from vehicle movements on six European Sites over a 20-year period (2020 to 2040). Data on NOx concentrations at appropriate locations has been collected monthly since October 2020 using diffusion tubes, with ammonia monitoring commencing on the same basis in 2021. Monthly monitoring of both pollutants continues to-date.
- 6.5 Natural England (NE) reviewed the data collected (alongside modelling predictions on the Air Pollution Information System) and were content that the NOx concentrations shown at the air quality collection points were below the threshold for concern. However, monitored ammonia concentrations were

higher than modelling predictions and modelling predictions indicated that all six sites were receiving nitrogen deposition inputs above their critical loads.

- 6.6 It was necessary to establish if NO_x emissions would remain under threshold once the proposed allocations in competent authority plans were factored in alongside proposals with consent or allocation in adopted local plans. The area of interest was extended to cover the Partnership authorities plus Dudley and Sandwell, based on the precautionary principle regarding whether the local plans could worsen the impacts of ammonia and nitrogen deposition.
- 6.7 In October 2022, Middlemarch Environmental were commissioned to prepare a brief to provide a detailed step-by-step methodology of how the partners could establish a scientific and robust evidence base to determine the likely air pollution impacts (both alone and in-combination) via increased traffic generation on several European sites as a result of Local Plan proposals coming forward. The brief scoped in European sites relevant to the partner authorities' plans and these sites were taken forward for detailed traffic and air quality modelling. NE confirmed that the brief "has been prepared in full accordance with Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. We are therefore able to support the report's methodology and its conclusions".
- 6.8 In August 2023 Sweco Ltd were commissioned to undertake the traffic and air quality modelling in line with the brief. Following completion of the modelling, Sweco's draft assessment concluded that, of the scoped sites, only four sites were subject to air pollution exceedance: Cannock Chase SAC; Cannock Extension Canal SAC; Fens Pool SAC; and Oakhanger Moss SSSI (Midlands Meres and Mosses Phase 2 Ramsar Site).
- 6.9 At a meeting on 11 September 2024 between the partner authorities, Sweco and NE, the baseline report findings were agreed and all four sites were discussed to understand likely impacts on the qualifying features of the sites and potential mitigation, with a number of actions and commitment to further meetings agreed.
- 6.10 At a meeting on 25 September 2024 it was agreed by NE that two sites could be screened out: (1) Fens Pool SAC - as this site is designated for Great Crested Newts which are not sensitive to air quality, and breeding ponds are located away from the exceedance areas; and (2) Oakhanger Moss - as air pollution exceedance was predominantly caused by national traffic growth outside of the project area due to proximity to the M6.
- 6.11 At a meeting on 14 November 2024, Cannock Chase SAC and Cannock Extension Canal SAC were discussed in detail in relation to understanding whether adverse effects on site integrity were likely to occur or not.

- 6.12 In relation to Cannock Chase SAC, NE confirmed that they had reviewed the extent of the habitats that are reasons for the SAC's designation within the areas of exceedance indicated by modelling: RAP01, RAP02 and RAP03. For RAP01 most of the area is mapped as site fabric, so adverse effects can be ruled out in this area. Some of the area is mapped as heathland, however the area that the exceedance falls within immediately adjoins a road and is predominantly trees. As heathland has a mosaic nature (which includes trees), and because the presence of trees near the road is likely to be buffering the SAC area from air emissions from the road, NE concluded that they would not wish to restore this area to heathland by tree removal. As such, a conclusion of no adverse effects on site integrity can be made for RAP01. For RAP02 the area of exceedance falls entirely within site fabric of the SAC, and therefore adverse effects on site integrity can be ruled out. For RAP03 there is an incredibly small area of qualifying habitat in the exceedance area and NE advised that adverse effects to site integrity can be ruled out because the associated area of qualifying habitat within the area of exceedance is negligible. Therefore, adverse effects to site integrity can be ruled out in relation to Cannock Chase SAC.
- 6.13 Regarding Cannock Extension Canal SAC, the document 'Ecology of the Floating Water Plantain' (Lansdown RV & Wade PM 2003), understood to be the authoritative document on floating water plantain in the UK, states that floating water plantain (which is the qualifying feature of Cannock Extension Canal SAC) is tolerant of a broad range of nutrient conditions. The plant is also the submerged phenotype along the SAC and so direct deposition of nutrients to the plant are not likely to occur, particularly in relation to ammonia and NOx. Floating water plantain can take some time to show responses to effects from additional nutrients, however it is likely that this would have been observed at the SAC given the prolonged presence of the immediately adjacent A5. Based on the apparent high degree of tolerance of floating water plantain to a range of environmental conditions and nutrient levels, as well as its submerged nature at the SAC, NE agreed that a conclusion of 'no adverse effects on site integrity' could be drawn.
- 6.14 A Statement of Common Ground (SoCG) [SD CD15a] to support Local Plans was then drawn up (and agreed on 4 December 2024), which clearly sets out matters of agreement between the partner authorities and NE regarding potential air quality impacts on protected sites, as summarised below:
- Constructive and ongoing engagement has occurred between all parties and the Duty to Cooperate has been met;
 - Supported the brief and the detailed methodology to scope out the European Sites from further assessment;
 - That the transport and air quality modelling undertaken by Sweco has been produced in line with the brief and represents a robust assessment for decision making;

- That the evidence demonstrates air pollution resulting in exceedance of critical loads and / or levels is present at the four European sites set out in para 6.9 above, however adverse effects on site integrity can now be ruled out; and
- That the Sweco study evidencing traffic growth and resultant air quality impacts will need to be kept under review and revisited when future planned growth across the partner authorities' geography becomes more certain.

6.15 The WLP Regulation 19 Habitat Regulations Assessment (HRA) [SD CD22], completed in November 2024, was able to take into account the completion of the majority of the work outlined above. In their WLP Regulation 19 response [SD CD10 R013], NE requested a minor update to the HRA to accurately reflect the reasons for concluding no adverse effect on site integrity as discussed in recent air quality working group meetings and reflected in the final agreed SoCG. This change has been made to the HRA, which was republished for submission [SD CD21].