

WOLVERHAMPTON LOCAL PLAN STAGE 1 EXAMINATION HEARINGS

AGENDA – DAY 3

Thursday 24 September 2026 at 9.45 am

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

MATTER 6 – Employment Needs, Requirement and Supply

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 session will run until around 1pm, with a mid-morning break. The afternoon session is reserved in the event that any sessions earlier in the week overrun. If it is necessary to hold a session in the afternoon, this will commence at 2pm.

Matter 6: Employment Needs, Requirement and Supply

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

Issue

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

Discussion Points

1. Taking into account the Council's reasoning within the Employment Land Topic Paper (2025), is the approach of basing employment land needs on historical

completions and development trends justified and supported by up-to-date and robust evidence?

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

The overall supply of employment land

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

8. The Council relies heavily on sites allocated in adopted Plans to meet the overall need. What evidence is there to show that these sites will come forward now when they have failed to do so since these Plans were adopted?
9. How does the employment land supply identified in the Wolverhampton Employment Land Supply Update (2025) relate to the requirement set out in Policy EMP1?

10. Policy EMP1 states that it will 'deliver a portfolio of sites of various sizes and quality to reach a range of business needs'. It is unclear what sizes and quality of sites are needed and how the Plan proposes to deliver these. Is it through the site allocations or through other means? Can the Council please clarify?
11. What contribution if any, are Strategic Employment Areas and Local Employment Areas intended to make to the employment land requirement?
12. How will the supply and delivery of employment land from neighbouring authorities to meet the identified unmet needs of Wolverhampton be undertaken?