

Wolverhampton **Local Plan**

Housing Topic Paper

Examination in
Public

July 2025



Contents

- 1. Introduction**
- 2. National Policy and WLP Local Housing Need**
- 3. WLP Housing Land Availability Assessment**
 - **Occupied Employment Land**
 - **Density Uplift**
 - **WMCA Black Country Brownfield Land Study**
 - **Wolverhampton SHLAA 2024 and WLP Site Assessment Results**
 - **Total Housing Supply 2024-42**
 - **Housing Supply update as of June 2025**
- 4. Determining the WLP Housing Requirement and Policy Approach**
 - **Housing Growth Options**
 - **Spatial Strategy**
 - **Housing Site Allocations**
 - **Policy HOU1 Housing Requirement**
- 5. The WLP Housing Shortfall and Duty to Cooperate**
 - **Regional Housing Work**
 - **WLP Issues and Preferred Options (Regulation 18)**
 - **WLP Regulation 19**
 - **Implications of Not Addressing the Housing Shortfall**
- 6. Approach to Addressing Affordable Housing Needs**

1. Introduction

- 1.1 A key element of a new Local Plan is to allocate sites for housing, including affordable housing, where a need has been demonstrated.
- 1.2 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 topic paper on meeting housing needs. The Inspectors noted that the Plan as submitted will not meet the area's identified housing needs, generating a shortfall. They requested a succinct summary of WCC's current position (as of June 2025), which:
- provides a justification for the chosen requirement figures and relevant policies;
 - confirms whether any impacts arising from not meeting the area's full identified needs have been appropriately assessed;
 - directs to the relevant evidence;
 - clarifies how any shortfalls will be addressed;
 - sets out the Council's approach to meeting the area's affordable housing needs, including the impact of viability on delivery.
- 1.3 There is a separate Topic Paper addressing Gypsy and Traveller and travelling showpeople accommodation needs [Examination Document (ED) WCC3]. The need for such accommodation is assumed to form part of overall housing need, and the anticipated future supply of such accommodation forms part of overall housing supply.

2. National Policy and WLP Local Housing Need

- 2.1 The WLP Regulation 19 Main Document [Submission Document (SD) CD1] was prepared under the December 2023 National Planning Policy Framework (NPPF). The associated Planning Practice Guidance (PPG) on Housing and economic needs assessment details the "standard method" for calculating local housing need (LHN).
- 2.2 The December 2024 NPPF, and associated updates to PPG, set out a new methodology to calculate LHN. However, Annex 1: Implementation sets out transitional arrangements for Local Plans that were submitted for examination on or before 12 March 2025, to which the December 2023 NPPF policies apply. As the WLP was submitted on 7 March 2025, the standard method set out in the December 2023 NPPF LHN methodology and previous version of the PPG ([Housing and economic needs assessment](#)) has been used to calculate the LHN for the WLP, using a base date of end March 2024 for household projection purposes.

- 2.3 The starting point for the standard method is the 2014-based household projections. For Wolverhampton, the average annual household growth for the period 2024-34 is 710.5 ([Live tables on household projections - GOV.UK](#)). The September 2023 median workplace-based affordability ratio for Wolverhampton of 6.29 was the most recent available information when the WLP was submitted on 7 March 2025 ([House price to workplace-based earnings ratio - Office for National Statistics](#)). The % uplift to be applied to the 710.5 figure is therefore $(6.29 - 4 / 4) \times 0.25 = 0.143$. Therefore, the formula to be applied is: $1.143 \times 710.5 = 812.19$. Wolverhampton is one of the cities and urban centres to which the cities and urban centres 35% uplift applies, as set out in PPG para 033. Applying this uplift produces a final annual LHN for Wolverhampton of 1,096 net homes.
- 2.4 Section 4 of the Wolverhampton Housing Market Assessment 2024 [SD H03] and section 3 of the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) 2024 [SD H04], confirm that 1,096 net homes is the LHN that should be used for the WLP process. This equates to **19,728 net homes over the WLP Plan period of 2024-42**. In accordance with para 008 of PPG on Housing and economic needs assessment, this need figure “may be relied upon for plan making for a period of 2 years from the time that the plan is submitted...”.

3. WLP Housing Land Availability Assessment

- 3.1 Para 001 of PPG on Housing and economic needs assessment explains the difference between housing need and the housing requirement for a Local Plan: “Housing need is an unconstrained assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.” PPG on Housing and economic land availability assessment explains how the assessment part of this process should take place, taking account of constraints such as the Green Belt.
- 3.2 Wolverhampton is a densely developed urban area, with small areas of green belt on the fringes. Most of the land within Wolverhampton is in existing established use or has been identified for various uses, leaving a very limited amount of surplus land. The shortage of supply of suitable land and sites for development is a major barrier to delivering housing in Wolverhampton now and in the future.
- 3.3 As set out in para’s 4.6 - 4.16 of the Spatial Strategy Topic Paper [ED WCC1], WCC has chosen not to review the Wolverhampton Green Belt to address any housing shortfalls arising from the WLP, in accordance with para’s 145 and 11 of the NPPF and no green belt sites have been considered for housing development throughout the WLP preparation process. Therefore, whilst the

SHLAA reports list details of green belt sites submitted through various “call for sites” exercises, these sites have been assessed as “not currently suitable for housing”, and no green belt sites have been taken through the WLP Site Assessment process.

- 3.4 The SHLAA 2024 and the WLP Site Assessment Report Nov 2024 [SD SI1], together provide the housing land availability assessment for the WLP Regulation 19. The boundaries and summary details (as per the Brownfield Register) for SHLAA 2024 sites which are suitable for housing can be viewed at: [Wolverhampton Housing Sites with Brownfield Register](#). The previous SHLAA 2022 ([Housing Site Information | City Of Wolverhampton Council](#)) and the WLP Site Assessment Report Feb 2024 [SD SI2] provided the assessment for the WLP Issues and Preferred Options Report (I&PO).
- 3.5 However, the approach to maximising housing supply in the urban area set out in the Wolverhampton SHLAAs extends back to the preparation of the BCP, as set out in the Black Country Urban Capacity Review [SD H06], and originated through preparation of the Black Country Core Strategy (BCCS) [SD DP1]. In particular, the BCCS aimed to increase housing densities, set ambitious housing targets for the four Strategic Centres and sought to identify broad locations in Regeneration Corridors where surplus employment land was likely to come forward for housing.

Occupied Employment Land

- 3.6 The BCCS identified poor quality, surplus occupied employment land as a major potential source of housing land supply across the Black Country, based on an assessment of sites previously coming forward for housing, and the economic and employment land evidence base at the time. However, as AAPs were prepared for Wolverhampton to allocate sites, detailed evidence collection and site owner engagement took place for significant areas of occupied employment land within the Regeneration Corridors, and it became clear that there was less potential for release of employment land for housing than had been anticipated.
- 3.7 Evidence prepared to support the Black Country Plan (BCP) indicated that 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].
- 3.8 The Black Country Economic Development Needs Assessment (EDNA) 2024 [SD EC1] assessed vacant land to see if it was suitable for employment land, and the Black Country Employment Area Review (BEAR) [SD EC9] provided an assessment of all the employment areas. These assessments were based on engagement with occupiers and landowners to establish their up-to-date positions regarding intentions for their current employment sites and future

business needs. This work provided the key evidence to inform what position the BCP should adopt on the protection and retention of existing employment areas, and which existing housing allocations on occupied employment land should be removed and which retained.

- 3.9 The overall effect of the EDNA, BEAR and landowner engagement work was to recommend that 1,152 homes (undiscounted) that are currently allocated in the AAPs on occupied employment land should no longer be allocated for housing.

Density Uplift

- 3.10 The BCCS housing density policy aimed to drive up densities in sustainable locations, based on accessibility by sustainable modes of transport to key residential services. The Draft BCP carried forward the approach to accessibility, whilst further driving up densities, from moderate: 35-45 dwellings per hectare (dph); high: 45-60 dph; very high: 60+ dph - to moderate: 40+ dph; high: 45+ dph; and very high: 100+ dph. This was based on an analysis of increasing densities over time on completed and permitted sites across the Black Country, and the potential to generate further housing capacity through density uplift, as detailed in the Urban Capacity Review (pages 22-25). The approach also responded to recommendations in the Greater Birmingham and Black Country Housing Market Area Strategic Growth Study 2018 ([Greater Birmingham and Black Country Housing Market Area Strategic Growth Study | Sandwell Council](#)).
- 3.11 This trend has intensified in Wolverhampton in recent years, with an average net density of 80 dwellings per hectare for commitments sites.

WMCA Black Country Brownfield Land Study

- 3.12 The Brownfield Land Study 2022 [SD H07] was commissioned by the West Midlands Combined Authority (WMCA) to provide an independent and objective assessment of brownfield land capacity for housing in the BCP area. It tested whether urban housing land supply had been maximised and whether additional brownfield land / sites could be identified.
- 3.13 The Study concluded that the sites selected for housing in the Draft BCP were appropriate, and that those sites that were assessed and not selected for housing represented the correct approach. It acknowledged the barriers that Wolverhampton faces in unlocking sites in the context of unwilling landowners / occupiers, the low viability that is prevalent across the City, and insufficient external funding. It recommended that work continued to be undertaken to determine if there was potential for additional housing capacity within centres.
- 3.14 Subsequently, the Black Country Authorities (BCAs) continued working together developing an approach to determine the potential housing capacity of centres (as set out in para's 3.33-3.34 below).

Wolverhampton SHLAA 2024 and WLP Site Assessment Results

- 3.15 The SHLAA 2024 assesses various potential sources of housing supply under a number of categories. These categories are detailed below, including a description of how each source has been taken into account in the WLP Regulation 19 in terms of the overall housing requirement and individual site allocations.
- 3.16 The SHLAA 2024 applies varying non-implementation discount rates, as appropriate, to the total supply from each of these sources, as detailed in the SHLAA 2024 para's 5.39 – 5.42. Discounts are not applied to individual sites. These discounts are balanced rates that take account of the likely availability of external funding to address constraints, as set out in the WLP Viability Assessment [SD IN3]. The discount rates were agreed with the other BCAs through the BCP process and, taken together, provide sufficient flexibility in the housing land supply to ensure that housing delivery levels are maintained. They represent a broad continuation of the discount rates used for the BCCS.

1. Commitments Sites - Permissions

- 3.17 These are sites with outline and full planning permission as of April 2024 (large sites updated as of summer 2024), of which sites of 50+ homes not yet under construction are proposed for allocation in the WLP Regulation 19 to ensure they are retained for housing use. The total supply from sites with planning permission but not yet under construction has been discounted by 5% in accordance with historic lapse rates as set out in the SHLAA 2024 (para 5.41 p.19).

2. Commitments Sites - Allocations in Adopted Plans

- 3.18 These are 19 sites allocated in adopted Plans which are still considered developable (suitable and available) up to 2042. The 17 allocations now considered **not** developable for housing up to 2042 in light of evidence prepared to support the BCP review / WLP are detailed in the SHLAA 2024 (para's 6.15-6.18 p.25 and Table 4 of Appendix 3). The majority of these sites were those designated on occupied employment land.
- 3.19 As set out in Diagram 1 of the Site Assessment Report, as part of the parallel processes of preparing the SHLAA reports and the WLP, all of these sites were subject to a review. This review involved adjustment of capacity and delivery details in line with the most up-to-date evidence, and the application of a density uplift in line with emerging WLP Policy HOU2 – Housing Density, Type and Accessibility, as set out in the SHLAA 2024 (para's 9.1-9.4 p.36-37). The density uplift has only been applied for those sites where Policy HOU2 is likely to apply i.e. they have capacity for 10+ homes and are likely to gain planning permission after anticipated adoption of the WLP in 2026/27.

- 3.20 The nine developable allocation sites which are **not** located within Wolverhampton City Centre (as this is not within the WLP scope) are proposed for allocation in the WLP Regulation 19.
- 3.21 The total housing supply from allocations on occupied employment land has been discounted by 15% to take account of the multiple delivery constraints that typically affect such sites and that are likely to reduce delivery on a minority of sites. Delivery constraints include poor ground conditions and the need for large scale master-planning, land assembly, business relocations and residential service access improvements.
- 3.22 The total housing supply from allocations on other land in the urban area has been discounted by 10% to allow for non-implementation, as some of these sites are also likely to be affected by delivery constraints such as poor ground conditions.

3. Council-owned Sites

- 3.23 These are six sites which are not yet commitments, where the Council has decided to pursue housing / mixed use development or disposal for housing / mixed use over a set timeframe, or large scale housing renewal. Of these, sites of 10 homes or more are proposed for allocation in the WLP Regulation 19.
- 3.24 For the past 15 years WCC has carried out an on-going land review and proactive search for housing sites, led by the Housing Development Team. The review has included a thorough assessment of surplus property; under-used garage sites; and low quality / value open spaces. The review has resulted in a significant increase in housing completions in recent years, although the supply of new sites is now reduced, as generally only difficult and expensive sites to develop remain.
- 3.25 Parts of Wolverhampton have been identified as needing some form of housing market intervention over the Plan period. Selective renewal of the existing housing stock and the surrounding residential environment will help to create more sustainable communities and support regeneration. The likely amount of housing demolitions for known Wolverhampton housing renewal sites (H7 - New Park Village and H24 – Tarrans) has been estimated for the purposes of the WLP, as set out in WLP Regulation 19 Table 4. These sites are anticipated to replace existing homes at rates of almost one for one. WCC is also considering further housing renewal to replace outdated non-traditional (concrete construction) properties across the city and will increase the number of replacement homes where suitable land is available. For housing renewal sites, housing demolition losses are also included, alongside likely housing rebuild capacity.
- 3.26 Density uplift does not apply to any of these sites, as they are either too small or have a detailed design agreed. The total supply from those sites which are not housing renewal sites has been discounted by 10% to allow for non-implementation, as some of these sites are also affected by delivery

constraints such as poor ground conditions. Housing renewal sites have not been discounted as they are funded and WCC is committed to complete them.

4. Other Potential Housing Sites

- 3.27 These are six privately-owned sites of 10 homes or more which are not yet commitments, but which are suitable and deliverable for housing use under adopted Local Plan policies and are also proposed for allocation in the WLP Regulation 19. The total supply from these sites has been discounted by 10% to allow for non-implementation, as some sites are affected by delivery constraints such as poor ground conditions. These sites have not been subject to a separate density uplift, as their housing capacity estimate is already based on WLP Policy HOU2.

5. Call for Sites Currently Unsuitable for Housing

- 3.28 As part of the review of the Black Country Core Strategy (BCCS), in 2017 an Issues and Options and Call for Sites consultation was published for eight weeks. The Call for Sites request then remained open until 2019. At the time, a total of 361 sites were submitted for consideration across the Black Country, predominately for residential and employment uses. A further Call for Sites exercise was undertaken in 2020 for a period of 6 weeks. A further 56 sites were received, in addition to those submitted in the earlier Call for Sites ([Call for Sites | Black Country Plan](#)).
- 3.29 The Wolverhampton call for sites exercise has been continually open through the Wolverhampton SHLAA process since 2009, with a relaunch in 2023 following the commencement of WLP preparation, requesting site submissions for housing (and employment) use. Details of all the call for sites submitted for housing use through these exercises (excluding withdrawn sites) are provided in the SHLAA 2024 [SD HO4] and on the BCP “call for sites” map [SD PC17].
- 3.30 These are sites submitted through the Call for Sites which are currently unsuitable for housing, but which would be suitable for housing following adoption of the WLP. There is only one site which falls within this category – WLP Site Ref H14 Lane Street / Highfields Road, Bradley. This site has been subject to site assessment, as set out in the WLP Site Assessment Report Nov 2024 (pages 25-29), and selected for allocation in the WLP Regulation 19.
- 3.31 As the site is occupied employment land, capacity has been discounted by 15% to take account of the multiple delivery constraints that typically affect such sites and that are likely to reduce delivery on a minority of sites. Delivery constraints include poor ground conditions and the need for large-scale master-planning, land assembly, business relocations and residential service access improvements.

- 3.32 One other site submitted through the Call for Sites (Sites at Sutherland Avenue / Cooper Street) was subject to site assessment and not selected (pages 30-33), as it is surrounded by unregulated employment uses which are important to protect for employment in line with WLP evidence and policies.

6. Small Windfall Sites

- 3.33 Para's 7.24-7.30 of the SHLAA 2024 explain that there is sufficient evidence, from past trends and an analysis of vacant and derelict sites with potential for housing, to support a small site windfall allowance for years 1-10 of the SHLAA, justified by genuine local circumstances. The BCCS Inspectors' Report supported the inclusion of a small windfall site allowance of just under 6%, or 418 homes per year across the Black Country, in the BCCS housing land supply calculations. Para 54 of the Report states that: "In a largely built up area, such as the BC, we accept that such an allowance is appropriate and locally justified..."
- 3.34 Site allocations across the Black Country are now typically 10 homes or more, which is also the key definition of a major development. The NPPF sets a threshold of less than 10 homes to define deliverability. It was also important, in the context of the BCP, to standardize approaches to housing supply across the sub-region. Therefore, for a number of years, a common definition for small windfall sites has been applied across the Black Country of 9 homes / 0.25 ha or less.
- 3.35 SHLAA 2024 Table 11 illustrates the stable supply of smaller windfall sites for housing in Wolverhampton over the past 15 years, even during the housing market dip of 2007-12. It would be difficult to imagine this supply of sites reducing substantially over time, as Wolverhampton is a large, urbanised area with a constant supply of small redundant buildings and sites generated through an on-going process of recycling of land and premises. Therefore, the SHLAA 2024 includes a small windfall site allowance which applies the average historic completion rate for the past 15 years to the period 2029-42. A small demolition site allowance is also applied. These allowances cover the whole of Wolverhampton, including Wolverhampton City Centre and Tier-2 and Tier-3 Centres.

7. Broad Locations - Wolverhampton City Centre and Other Centres

- 3.36 Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. Broad locations can be areas, such as a town centre, where site surveys have not been able to identify specific sites, but where it has been considered that there is housing potential.
- 3.37 The Wolverhampton City Centre AAP (2016) [SD DP2] set out detailed housing allocations and other sources of housing capacity to help meet the BCCS housing target. The planning status and deliverability commentary for each of the ten remaining housing allocations is set out in the SHLAA 2024 Appendix 3 Table 1 (p.47-50). Given the complex and evolving nature of

development opportunities in the City Centre, there have been a number of changes to these site allocations over the past ten years. The availability of external funding and direct involvement of WCC and other public bodies has also driven an acceleration of development activity in recent years, as highlighted by the progress made during 2024-25, which is detailed in Table 3 and para 3.43 below. A number of flexible allocations with potential for housing as part of mixed use development have since either been brought forward for housing or lost to other uses (SHLAA 2024 para's 7.17-7.18).

- 3.38 The WLP does not make or review allocations within Wolverhampton City Centre. However, additional housing capacity, over and above existing supply and the continuation of small windfalls, is expected to come forward on surplus vacant floorspace as a result of structural changes predicted to take place within Wolverhampton City Centre over the Plan period, as set out in WLP Regulation 19 Table 4 and detailed in the SHLAA 2024 (para's 7.15-7.16). The main factors driving these structural changes are changes to shopping patterns, changes to permitted development rights and changes to work patterns arising from Covid impacts. The estimate of additional housing capacity arising from structural changes is informed by the approach in the Black Country Centres Study [SD CE1b section 5; CE2 para's 2.38-45, CE3 para's 2.54-8 and CE3a p.13]. These allowances are over and above the small windfall site allowance for the whole City detailed above i.e. beyond historic trends.
- 3.39 A structural change allowance for surplus vacant floorspace has also been included in the housing supply for the two Tier-2 Centres and twenty-eight Tier-3 Centres (as defined in WLP Policy CEN1), as set out in the SHLAA 2024 (p.31 para's 7.20-7.22). These allowances are also over and above the small windfall site allowance for the whole City. The rate of change in these Centres is predicted to be far lower than for Wolverhampton City Centre, because they have historically delivered very low completion rates, and proved more resilient to structural changes and therefore have lower vacancy rates.

Total Housing Supply 2024-42

- 3.40 The SHLAA 2024 found that, taking into account suitable and deliverable sites in the urban area, windfall and broad location allowances - including a 4,676 home estimate of housing capacity in Wolverhampton City Centre (as set out in p.30 para's 7.19-7.20) - the total housing supply for Wolverhampton over the Plan period was 9,203 homes. Furthermore, uplifting housing densities in line with WLP Policy HOU2 would generate 66 homes, and allocating one site in the WLP which is currently unsuitable for housing would add 61 homes to housing land supply.
- 3.41 Therefore, the total housing land supply for the WLP Regulation 19 Plan period is 9,330 net homes. When compared against LHN of 19,728 homes (para 2.4 above) this creates a significant shortfall of 10,398 homes over the Plan period 2024-42.

Housing Supply update as of June 2025

- 3.42 Housing supply figures are provided for annual periods, beginning each April. The WLP Regulation 19 housing supply figures use a base date of end March 2024 for housing monitoring purposes, which is also the start date for the WLP as submitted. It is now possible to provide a partial update of housing supply figures as of June 2025, for identified sites, including the annual housing monitoring update for the April 2024-March 2025 monitoring year and with deliverability information for major sites updated as of June 2025.
- 3.43 During the 2024-25 monitoring year, there were 492 gross housing completions and 30 demolitions, resulting in 462 net completions. 54 homes were lost to supply through expiry of planning permission or loss to other uses on 24 sites. 260 homes entered the housing supply through planning permission on 39 new sites during 2024-25, of which 44 homes formed part of the 492 gross completions. One Council-owned site with capacity for 12 homes entered the housing supply, and now has a planning application under consideration.
- 3.44 Table 2 below sets out changes which have taken place since WLP Regulation 19 stage, in November 2024, for all of the proposed WLP Regulation 19 housing site allocations. Notable changes are the significant loss of housing capacity (216 homes) on site H8, and that site H13 (38 homes) is no longer suitable or deliverable for housing. It should also be noted that 8 of the 25 sites now have extant planning permissions in place, of which 4 are under construction – including 388 homes on H3 and H4. Of the remaining sites, progress has been made since November 2024 on bringing forward sites H8, H9, H15, H16 and H21 totalling 470 homes. The changes on these sites give rise to a total change in housing capacity (without discount) of -279 homes, and +51 homes within the WLP 5 year supply period.
- 3.45 Similarly, Table 3 sets out changes which have taken place for all existing housing allocation sites and sites of 50+ homes in Wolverhampton City Centre. Notable changes are the significant gain of housing capacity (141 homes) on part of the former City Centre West site, following grant of permission for the Smithgate development, the emergence of a new site with capacity for 75 homes, and the bringing forward of significant capacity into the WLP 5 year supply on the Smithgate development and Crane Foundry – both driven by WCC involvement. It should also be noted that 10 of the 19 sites now have planning permission, of which 5 are under construction. Of the remaining sites, significant progress has been made since November 2024 on bringing forward three sites totalling 1,284 homes. The changes on these sites give rise to a total change in housing capacity (without discount) of +221 homes, and +920 homes within the WLP 5 year supply period.

Table 2 WLP Regulation 19 Housing Site Allocations – Change between November 2024 and June 2025

WLP Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): WLP Reg 19 / June 2025; part in WLP 5 year supply (2024-32)
H1	Bluebird Industrial Estate and site to rear, Park Lane	No change	Stafford Road Corridor AAP allocation for 130 homes. Following adoption of WLP, site would be suitable for 40 dph.	130 / 130 2024-32: 0 / 0
H2	Former G & P Batteries Site, Grove Street, Heath Town	Changed phasing from 2029-32 to 2030-32	Heathfield Park Neighbourhood Plan allocation. Outline application approved Feb 2021 for 56 no 2 bed flats. Owner looking to sell to developer. Appropriate under WLP Policy HOU2 for current high density.	56 / 56 2024-32: 0 / 0
H3	East of Qualcast Road, Canalside South	Full permission granted and under construction. Minor change in capacity from 152 to 153.	Part of Bilston Corridor AAP allocation H1. Site acquired by WCC in 2020 to be brought forward in conjunction with West of Qualcast Road (WCC-owned) and fmr Crane Foundry (CRT-owned). Preferred development partner selected (Wavensmere) to deliver 380 houses and 140 flats (on Crane Foundry site). £20m loan secured through WMCA March 2024. 20% affordable housing to be delivered. Full permission granted Sept 2024. Phase 1 (East of Qualcast Road) due to be completed early 2027.	152 / 153 2024-32: 152 / 153
H4	West of Qualcast Road, Canalside South	Full permission granted and under construction. Minor change in capacity from 228 to 235.	Part of Bilston Corridor AAP allocation H1. Site acquired by WCC in 2020 to be brought forward in conjunction with East of Qualcast Road (WCC-owned) and fmr Crane Foundry (CRT-owned). Preferred development partner selected (Wavensmere) to deliver 380 houses and 140 flats (on Crane Foundry site). £20m loan secured through WMCA March 2024. 20% affordable housing to be delivered. Full permission granted Sept 2024.	228 / 235 2024-32: 228 / 235
H5	West of Colliery Road, Horseley Fields	No change	Part of Bilston Corridor AAP allocation H1 for 147 homes. Following adoption of WLP, 75% of 2.94 ha site would be suitable for 45 dph. Remaining 25% suitable for other commercial uses.	90 / 90 2024-32: 0 / 0

WLP Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): WLP Reg 19 / June 2025; part in WLP 5 year supply (2024-32)
H6	Heath Town Estate Masterplan - Chervil Rise	Reduction in capacity from 54 to 37 homes.	Part of Heath Town Masterplan site granted outline permission in 2017. Reserved matters permitted 2021. Demolition during 2021/22. Part of site now allocated for an energy centre, therefore capacity will reduce and a new planning application will be prepared. To be delivered through WCC Housing Development Framework.	54 / 37 2024-32: 54 / 37
H7	New Park Village Housing Renewal (Ellerton Walk)	Full permission granted.	Council housing renewal scheme to replace low quality housing stock. 205 demolitions - 101 in 2025/26 and 104 in 2027/28. Phase 1 (105) social rent for existing tenants; Phase 2 (83) affordable rent for new tenants.	188 (-17 net) / 188 (-17 net) 2024-32: 188 / 188
H8	Dobbs Street, Blakenhall	WMCA state site not viable for 266 flats, but viable for 50 houses. Demolition planned for summer 2025 and outline application for 50 houses due to be submitted. Capacity reduced from 266 to 50 homes. All now phased for 2024-32.	Fmr banqueting suite and industrial units acquired in 2020 by WMCA who originally planned to progress the site for high density residential. Following feasibility work this is no longer viable.	266 / 50 2024-32: 0 / 50
H9	Dudley Road / Bell Place, Blakenhall	Permission for removal of basement car park from design of extant permission approved Feb 2025.	Wolverhampton City Centre AAP allocation for 25 homes covering car parks. Southern part of allocation not now developable therefore not included in WLP site allocation. Full permission granted March 2021 for 100 flats and offices on remaining northern car park - implemented in 2023 therefore extant. Permission for removal of basement car park from design approved Feb 2025.	100 / 100 2024-32: 100 / 100
H10	Royal Hospital Development Area, All Saints	Part completed (50 homes) / part full planning permission (93 homes)	Part of Royal Hospital Development Area which was allocated in the Wolverhampton City Centre AAP for min 100 homes. Permission granted for 93 homes on Dixon House and Cleveland Club site in autumn 2024.	143 / 143 2024-32: 143 / 143
H11	Delta Trading Estate, Bilston Road	No change	Bilston Corridor AAP allocation. Following adoption of WLP, site would be suitable for 40 dph subject to access improvements. This would result in an increase in capacity of 10 homes.	80 / 80 2024-32: 0 / 0

WLP Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): WLP Reg 19 / June 2025; part in WLP 5 year supply (2024-32)
H12	Land at Hall Street / The Orchard, Bilston Town Centre	No change	Cleared / vacant area in majority WCC ownership, with potential to assemble for development.	21 / 21 2024-32: 0 / 0
H13	Former Pipe Hall, The Orchard, Bilston Town Centre	No longer suitable or deliverable for housing Loss of capacity for 38 homes.	Listed building purchased by WMCA in 2020 for residential development and suitable for conversion and new build to create up to 38 flats. Now considered not viable for housing and programmed for non-residential use.	38 / 0 2024-32: 38 / 0
H14	Lane Street / Highfields Road, Bradley	No change	Occupied employment land not currently suitable for housing as protected employment land. Site submitted through BCP call for sites and subject to site assessment through the WLP process. 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.	72 / 72 2024-32: 0 / 0
H15	Greenway Road, Bradley	Full planning application submitted for one third of site, including majority of land owners. Implementation of this permission would effectively reduce the potential for density uplift from 40 to 27 homes, changing capacity from 180 to 167 homes and bringing forward 51 homes during 2024-32.	Bilston Corridor AAP allocation. Following adoption of WLP, site would be suitable for 45 dph subject to access improvements. This would result in an increase in capacity of 40 homes. As of June 2025, planning application under consideration for 51 affordable rent on Land at Hatton Street part (1.22 ha).	180 / 167 2024-32: 0 / 51
H16	Former Loxdale Primary School, Chapel Street, Bradley	Brownfield Land Release Fund secured in late 2024 to support remediation. Site clearance and remediation will be carried out during 2025-2026 to enable sale of the land to development partners.	WCC owned surplus site. Mine shafts require remediation. Brownfield Land Release Fund secured in late 2024 to support remediation. Site clearance and remediation will be carried out during 2025/26 to enable sale of the land to development partners for delivery of energy efficient homes by modern methods of construction.	100 / 100 2024-32: 100 / 100
H17	South of Oxford Street, Stag Industrial Estate, Bilston	No change	Bilston Corridor AAP mixed use allocation on occupied employment land.	20 / 20 2024-32: 0 / 0
H18	Land at Railway Drive, Bilston	No change	Outline permission granted Sept 2020. Owner looking to sell to a developer. Appropriate under	47 / 47 2024-32: 47 / 47

WLP Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): WLP Reg 19 / June 2025; part in WLP 5 year supply (2024-32)
			emerging WLP Policy HOU2 for current high density.	
H19	Former Bilston College, 40 and adjoining land, Mount Pleasant, Bilston Town Centre	No change	Permission implemented 2016 therefore extends in perpetuity. Demolition works carried out to facilitate redevelopment. Site purchased in 2023.	64 / 64 2024-32: 64 / 64
H20	Fmr Rookery Lodge, Woodcross Lane	No change	Permission granted 2012 for care village including self-contained accommodation. Not brought forward due to viability / mineshafts. Owner keen to progress, subject to external funding bid.	16 / 16 2024-32: 0 / 0
H21	Former Stowheath Centres, Stowheath Lane	Brownfield Land Release Fund secured in late 2024 to support remediation. Site clearance and remediation will be carried out during 2025-2026 to enable sale of the land to development partners. Demolition notice issued May 2025.	WCC owned surplus site. Mine shafts require remediation. Brownfield Land Release Fund secured in late 2024 to support remediation. Site clearance and remediation will be carried out during 2025/26 to enable sale of the land to development partners for delivery of energy efficient homes by modern methods of construction. Demolition notice issued May 2025.	53 / 53 2024-32: 53 / 53
H22	Fmr Probert Court / Health Centre, Probert Road	No change	Discussion underway with owners regarding residential scheme, subject to relocation of GP surgery programmed for 2025. Appropriate under emerging WLP Policy HOU2 for a density of 40 dph.	35 / 35 2024-32: 35 / 35
H23	Fmr Gym, Craddock Street WV6 0QJ	No change	Part of housing allocation in Wolverhampton UDP. Not included in SHLAA previously as in active use as a gym with no prospect of delivery. Building fire-damaged in 2020/21, providing potential to bring forward for housing and allowing allocation to be carried forward in emerging Wolverhampton Local Plan. Non-conforming and out-of-centre commercial site in a residential area. Redevelopment for housing would contribute to housing supply and provide an opportunity to improve character and appearance of this relatively deprived area. Site has high levels of accessibility to residential services, however the surrounding suburban context limits density to 40 dph in line with emerging WLP Policy HOU2.	48 / 48 2024-32: 48 / 48

WLP Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): WLP Reg 19 / June 2025; part in WLP 5 year supply (2024-32)
			Subsequent applications for change of use to employment withdrawn. On-going discussions with site owner to bring forward site.	
H24a	Tarrans Housing Renewal (Portobello - Arnhem Road)	51 of 138 homes now have full planning permission and are under construction. Demolitions increased from 126 to 129, changing net capacity from 12 to 9.	Council housing renewal scheme to replace low quality housing stock. Planning application due to be submitted 2025. 12 demolitions (due in 2026/27 and 2027/28).	15 (3 net) / 15 (3 net) 2024-32: 15 (3 net) / 15 (3 net)
H24b	Tarrans Housing Renewal (Portobello - Alamein Road)		Council housing renewal scheme to replace low quality housing stock. Planning application due to be submitted 2025. 9 demolitions (3 remaining in 2026/27).	12 (0 net) / 12 (0 net) 2024-32: 12 (0 net) / 12 (0 net)
H24c	Tarrans Housing Renewal (Wood End - Orchard Road)		Council housing renewal scheme to replace low quality housing stock. Planning application under consideration in June 2025. 12 demolitions (remaining 9 in 2026/27).	12 (0 net) / 12 (0 net) 2024-32: 12 (0 net) / 12 (0 net)
H24d	Tarrans Housing Renewal (Lincoln Green)		Council housing renewal scheme to replace low quality housing stock. 93 demolitions (14 in 2025/26; remaining 59 in 2026-28). First phase of 51 bungalows gained full permission in Dec 2024 and are under construction.	99 (9 net) / 99 (6 net) 2024-32: 99 (9 net) / 99 (6 net)
GT1	Fmr Bushbury Reservoir, Showell Road	Changed status to full planning permission following confirmation that infilling of former pool represented implementation of 2013 planning permission. Propose to retain as WLP allocation, given importance as only allocated gypsy and traveller pitch site and recent refusal of permission for general purpose housing on site.	Site allocated for gypsy and traveller pitches in Stafford Road AAP. Full permission granted in 2013 for 12 pitches. Former fishing pool subsequently filled, implementing this permission. Planning permission refused for general purpose housing in 2020.	12 pitches / 12 pitches 2024-32: 12 / 12
Total Change (without discount)				-279 homes 2024-32: +51 homes

Table 3 Wolverhampton City Centre AAP Housing Site Allocations and Sites of 50+ homes – Change between November 2024 and June 2025

SHLAA Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): SHLAA 2024 / June 2025; part in WLP 5 year supply (2024-32)
39560	Former Network House, School Street	Site formed part of 3678 City Centre West site in 2022-2024 SHLAAs and was separated off following permission for majority of site under Smithfield proposal in 2024/25. Additional capacity for 113 homes.	Wolverhampton City Centre AAP allocation. Permission granted 2019 for demolition and re-build for 113 flats.	0 / 113 2024-32: 0 / 0
44710	Premier House, 68-78 Darlington St	Site formed part of 3678 City Centre West site in 2022-2024 SHLAAs and was separated off following permission for majority of site under Smithfield proposal in 2024/25. Additional capacity for 28 homes.	Call for sites submitted through WLP Issues and Preferred Options. Site formed part of 3678 City Centre West site in 2022-2024 SHLAAs and was separated off following permission for majority of site under Smithfield proposal in 2024/25.	0 / 28 2024-32: 0 / 0
28840	Land at Grimstone St / Culwell St, Canalside Quarter	Currently used as a distribution depot by Carlsberg / Marstons Brewery (main site is on Chapel Ash) who have recently announced they will be closing their entire operation in autumn 2025.	Wolverhampton City Centre AAP allocation. Feasibility study indicates capacity. Potentially part of Brewers Yard scheme.	285 / 285 2024-32: 0 / 0
27350	St Marks Road (adj Sainsbury's)	No change	Wolverhampton City Centre AAP allocation. Site cleared and available. Permission granted for supported living accommodation on western third of site in Feb 2024 - removed from this site in 2023/24. Following adoption of WLP, site would be suitable for 100 dph as located within City Centre, resulting in an increase in capacity of 26 homes.	24 / 24 2024-32: 24 / 24
36810	Cambridge Street Open Space, Canalside Quarter	No change	WCC owned surplus open space allocated in Wolverhampton City Centre AAP. Following adoption of WLP the moderate density character of adjoining residential area limits density to existing 88 dph.	43 / 43 2024-32: 43 / 43
36800	Stafford Street / Cannock Road, Canalside Quarter	No change	Wolverhampton City Centre AAP allocation. Part in WCC ownership.	210 / 210 2024-32: 210 / 210
36830	Mill Street Depot, Canalside Quarter	No change	Wolverhampton City Centre AAP allocation. Grade II Listed Building. Former railway offices.	35 / 35 2024-32: 35 / 35
44640	Old Steam Mill and Sack	No change	Part of Wolverhampton City Centre AAP allocation with identified potential for mixed use including	153 / 153 2024-32: 0 / 0

SHLAA Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): SHLAA 2024 / June 2025; part in WLP 5 year supply (2024-32)
	Works, Corn Mill		residential. The Council is working with development partner Ion to bring forward the site. Call for sites submitted through WLP Issues and Preferred Options.	
44620	St George's Parade	Design competition recently completed. WCC is now working with development partner Capital&Centric to bring the scheme forward.	Wolverhampton City Centre AAP allocation (flexible use). Former Sainsbury's store including converted church (Grade II Listed Building).	400 / 400 2024-32: 400 / 400
36820	Culwell Street Depot and adjoining land, Canalside Quarter	Demolition and rebuild work on new depot (site of wholesale market, Hickman Avenue) due to commence 2025/26 - outline planning approval secured, new application submitted May 2025.	Wolverhampton City Centre AAP allocation. WWC owned Culwell Street Depot, subject to relocation of existing depot to Hickman Avenue. Outline permission for 599 homes in 2023. Feasibility study indicates potential additional capacity subject to extending existing allocation to incorporate adjoining industrial units. Part of Brewer's Yard scheme.	599 / 599 2024-32: 599 / 599
36780	Smithgate (majority of previous City Centre West site)	Hybrid permission granted late 2024 for mixed use including 1070 homes, of which 331 with full planning permission (to be delivered 2026-30), with no affordable housing. Council working with development partner ECF (Homes England, Legal & General, Muse) to bring forward mixed use development. Majority of site now phased for 2024-32.	Wolverhampton City Centre AAP allocations.	1070 / 1070 2024-32: 0 / 770
38610	Land corner of Stafford St and Bone Mill Lane	No change	879 bed student accommodation. Full permission granted in 2017. Site cleared and development commenced 2020. Covid-19 halted works. Developer plans to complete for student intake autumn 2026.	352 / 352 2024-32: 352 / 352
44030	Westbury House Westbury Street	No change	Full permission granted May 2022	68 / 68 2024-32: 68 / 68
32660	Horseley Fields / Edward Vaughan Stamping Works / Union Mill, Canalside Quarter	Remediation of majority of site completed and material start on site so permission extant. Build-to-rent properties.	Allocated in Wolverhampton City Centre AAP. Site WCC and CRT owned. Full permission in Nov 2021. Land deal completed with developer Placefirst in Oct 2023.	366 / 366 2024-32: 366 / 366

SHLAA Site Ref	Site Name	Change between WLP Reg 19 (Nov 2024) and June 2025	SHLAA Deliverability Commentary (updated as of June 2025)	Indicative no. of homes (remaining capacity): SHLAA 2024 / June 2025; part in WLP 5 year supply (2024-32)
32690	Former Eye Infirmary, Chapel Ash	Material start on site so permission extant. Development stalled as of June 2025 due to viability issues.	Allocation in City Centre AAP. Vacant locally listed buildings for conversion to apartments, and mixed use new build. Permission granted Oct 2022. Application to vary condition approved Mar 2023.	75 / 75 2024-32: 75 / 75
42550	Fmr Beatties, Darlington Street	Permission to vary conditions Sept 2024. Material start on site so permission extant. Development stalled as of June 2025.	Mixed use scheme with commercial and residential. Full permission Nov 2022 (previous permission for 306 flats).	400 / 400 2024-32: 400 / 400
32650	Crane foundry, Canalside South	Full permission granted Sept 2024 for slightly increased capacity. Phase 1 (East of Qualcast Road) due to be completed early 2027.	Wolverhampton City Centre AAP allocation CC-4I. Site acquired by WCC in 2020 to be brought forward in conjunction with WCC-owned East and West of Qualcast Road (WLP H3 & H4). Preferred development partner selected (Wavensmere) to deliver 380 houses and 140 flats (on Crane Foundry site). £20m loan secured through WMCA March 2024. 20% affordable housing to be delivered.	140 / 145 2024-32: 70 / 145
40610	Land West Of 1A Cleveland Street	Under construction	Mixed use new build scheme on cleared site in City Centre, with retail at ground floor and student flats above. Conditions discharged March 2022.	63 / 63 2024-32: 63 / 63
NEW SITE 44780	Waterloo Court 31 Waterloo Road	Full planning permission March 2025 Additional capacity for 75 homes		0 / 75 2024-32: 0 / 75
Total Change (without discount)				+ 221 homes 2024-32: +920 homes

- 3.46 In order to update the WLP housing supply to end March 2025 it is necessary to remove one year of windfall allowances (for 2029/30), to roll forward the approach of not having windfalls in the first 5 years, and to update the windfall allowances for the year 2024-25, using the method set out in para's 7.25 – 7.30 of the 2024 SHLAA i.e. using average small site windfall completions for the past 10 years (2015-25). This produces an average of 142 homes per annum. Therefore the net small windfall allowance for the period 2030-42 would be 1,704 homes.
- 3.47 Given that the allowances made in the SHLAA 2024 for structural change in Centres (as set out in para's 3.36 – 3.37 above) are modest and based on 2023/4 vacant floorspace data which has not yet been updated, it is not appropriate to change these capacity estimates.
- 3.48 The uplift to housing densities in line with WLP Policy HOU2 would generate a reduced 53 homes (see site H15 information in Table 2), and allocating one site in the WLP which is currently unsuitable for housing (H14) would add 61 homes to housing land supply following discount.

Total Housing Supply 2024-42 Updated as of June 2025

- 3.49 Table 4 below sets out the calculation used and the updated total supply 2024-42 of 9,502 homes (following adoption of the WLP), taking into account changes in housing supply up to end March with deliverability information for major sites updated as of June 2025. This is 172 homes above the WLP Regulation 19 housing land supply figure of 9,330 homes (see para 3.39 above).

Table 4 Total Housing Supply 2024-42 Updated as of June 2025

Elements of Housing Supply	Net Homes
Net Completions 2024-25	462
Estimated demolitions 2025-2042 (housing renewal and small demolition windfalls of 3 per annum)	-385
Commitments Sites (with 5%, 10% or 15% discount as appropriate)	6,455
Council sites (with 10% discount)	150
Other Potential Housing Sites (with 10% discount)	187
Small windfall site allowance (2030-42)	1,704
Structural change in Centres (2029-42)	353
Density uplift (following discount)	53
New WLP site H15 (following discount)	61
Total	9,502

4. Determining the WLP Housing Requirement and Policy Approach

Housing Growth Options

- 4.1 The I&PO identified and consulted on options for the WLP – including housing and employment growth options and spatial options. Given the amount of work undertaken recently on the BCP, it was possible to select and consult on preferred options for the WLP.
- 4.2 The I&PO (para's 5.10 – 5.22) sets out the three housing growth options considered (using 2022 need and supply figures) and an assessment of the advantages, disadvantages and limitations for each option. Option H3 was the preferred option. The housing need and supply figures for these options were updated as of 2024 for WLP Regulation 19 stage, for the purposes of the Sustainability Appraisal (SA) [SD CD3], as set out in the extract below:

Table N.5.1: Housing growth options identified by CWC

Option	Description of housing growth option	CWC assessment of option
Option H1	Carry forward existing housing allocations which focus housing growth in urban area: c.8,850 homes on existing supply in urban area	- 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: - c.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	- 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: - c.8,850 homes on existing supply in urban area 61 homes on one new allocation (following discount) - c.419 homes from density uplift and structural change in Centres - c.10,398 homes exported through Duty to Cooperate	- 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

- 4.3 Given the significant amount of existing housing supply identified in the SHLAA 2024 on committed and allocated sites and the limited potential to allocate new sites and uplift densities, there were limited housing growth options available for the WLP to consider within the Wolverhampton City boundary – with a difference of 480 homes between Option H1 and Options H2 & H3. The SA (Figure N.5.2 on page N17) concluded that there was no clear best performing option. **Through the SA process, any impacts arising from not meeting the area's full identified needs have been appropriately assessed.**

- 4.4 The WLP Consultation Statement Publication Plan (Regulation 19) [SD CD9] provides a summary of responses to the I&PO consultation. 35.6% of respondents agreed with the Preferred Housing Growth Option (H3) and the proposed apportionment approach to housing contributions from neighbouring authorities for the WLP and 55.6% disagreed. The detail of responses made on the Preferred Housing Growth Option are provided on pages 48-56, and summarised below:
- support protection of green belt;
 - not clear how 35% cities and urban centres uplift will be met;
 - 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 Housing Growth Option is over-reliant on complex, constrained, brownfield and high density city centre sites.
- 4.5 In terms of how these issues have been addressed in the WLP Regulation 19, the WCC response is summarised as follows:
- Regarding the need for a green belt review, WCC has chosen not to review the green belt in accordance with NPPF para's 11 and 145.
 - Housing Growth Options are clear how the 35% cities and urban centres uplift will be met within Wolverhampton, as required by NPPF and PPG.
 - The WLP Reg 19 preferred housing growth option / spatial strategy / housing supply position strikes the right balance between seeking to maximise housing delivery on suitable and developable sites, including through allocation of poor quality employment land and high densities assumptions (particularly in the City Centre), and taking a cautious approach which takes account of ground condition issues and other viability constraints affecting some brownfield sites. Likewise, robust windfall assumptions and discount rates based largely on historic rates are balanced with reasonable assumptions regarding likely structural change, particularly in centres, over the Plan period, based on a robust analysis of more recent, strong national trends. It is typical for major housing development in Wolverhampton to take a number of years, and sometimes decades, to come forward for development. However, the majority of site allocations are ultimately developed, therefore it is reasonable to carry forward WLP housing allocations from previous Development Plan Documents. The Council is working proactively with partners to bring forward these sites, and has an excellent track record of delivery, including through direct ownership and securing external funding.

Spatial Strategy

- 4.6 The process for determining the WLP Spatial Strategy is set out in the separate Spatial Strategy Topic Paper [ED WCC1]. The preferred housing and employment growth options consulted on 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
- 4.7 The WLP spatial strategy of balanced and sustainable growth aims to 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 of the strategy are to increase housing density in the most accessible locations, and to provide more housing

in Wolverhampton City Centre. The strategy focuses development in the Growth Network, composed of three Core Regeneration Areas and the City Centre, and represents an evolution of the spatial strategy in the UDP, BCCS and Draft BCP. The strategy is to a large extent driven by the location of available development sites across the City.

Housing Site Allocations

- 4.8 Most of the sites in the urban area which were proposed for allocation for housing 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 SHLAA process for over ten years. Since consultation on the Draft BCP, the SHLAA process had generated four new sites suitable for housing, which were highlighted in I&PO Table 4 (para 5.42). Four sites (predominantly greenfield) were now not suitable for housing, as set out in I&PO Table 5. The I&PO consultation promoted and encouraged the submission of any further sites through the “call for sites” process.
- 4.9 The main issues relating to housing site allocations raised by I&PO representations, and how these have been addressed in the WLP Regulation 19 are set out on pages 118-130 of SD CD9, are summarised below (excluding those relating to the omission of green belt sites). This includes updates to reflect WLP Regulation 19 consultation responses, as appropriate:
- The WLP Site Assessment and site allocation selection process should take full account of the evidence base, including ecological information, nature conservation designations and Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) findings. Sites with negative impacts on SINCs or SLINCs should not be allocated unless suitable mitigation measures can be secured

Response:

The WLP Site Assessment methodology and individual site assessment reports provide a balanced consideration of the evidence base for each site, including ecological information, nature conservation designations and the SA and HRA findings. The SA concludes that, for those sites with potential impacts on SINCs and SLINCs, mitigation measures set out in WLP site policies will significantly reduce impacts on nature conservation / biodiversity. The WLP has achieved a balance between addressing high development pressures and the need to maximise efficient use of land in the urban area, and the need to protect areas of biodiversity value, promote nature recovery and meet national biodiversity net gain requirements. *[WLP Reg 19: Recent ecological surveys have been carried out for the majority of site allocations where nature conservation value was considered likely to be an issue. WLP Table 12 sets out clearly which site allocations are affected by a SLINC designation and/ or currently considered to be subject to BNG, and outlines that mitigation will be required. It is not appropriate to carry out a detailed LSA for each allocation because the nature and value of habitats can change over time, and there are limited financial and time resources.]*

- Historic England requirement for provision of further information on the historic environment context and potential heritage impacts of development for WLP site allocations

Response: The potential heritage impact of all site allocations has been assessed, including consideration of all heritage assets within 500m of the site, as summarised in the WLP Site Assessment Report and WLP Table 12 of Section 13. Where potential negative heritage impacts have been identified, a Heritage Impact Statement (HIS) is required, as detailed in this table, and should be submitted with any planning application to enable full consideration of these impacts and any proposed measures to avoid or mitigate harm. This approach is proportionate as it is more appropriate to require a HIS at planning application stage, when the detailed design of the development, which could affect heritage impact, will be known. *[WLP Reg 19: A Heritage Impact Assessments report has been published to evidence that heritage impacts were fully taken into account to evidence WLP site allocations.]*

- Concerns over deliverability of housing at H1 Bluebird Industrial Estate and site to rear, Park Lane

Response: This is an existing Stafford Road Corridor AAP allocation and has been subject to recent interest in housing development. It is important for the WLP to identify limited amounts of surplus employment land which is suitable for housing and has a realistic prospect of delivery over the 15 year Plan period. Much of the housing supply on large sites which has come forward in the Black Country authorities in past decades has been on surplus employment land.

- Site policy for H5 West of Colliery Road should reflect proximity of the BOC site and noise context

Response: Site H5 is over 300m from the BOC site and separated from it by an active railway line, a disused railway corridor and the A454, which produces significant noise. WLP and other retained Development Plan policies deal sufficiently with noise impacts relating to planning applications and the protection of employment uses. *[WLP Reg 19: Windfall housing would be effectively controlled through the Health and Safety Executive buffer zone around the BOC site which restricts such development.]*

- E17 Former MEB Site, Major Street / Dixon Street should be allocated for housing rather than employment use

Response: WCC remains of the view that this site is suitable for employment uses particularly given the findings of the BC EDNA (2024) and the widening gap between employment land need and supply in Wolverhampton and the wider Black Country. The challenges in delivering the site are recognised, however the WLP is a long term plan and future grant funding programmes may provide opportunities to address the viability gap. The SHLAA 2024 concludes that the site is not suitable for housing due to the proximity of operational heavy industry which would significantly constrain capacity, combined with prohibitive remediation costs.

- Former St Luke's School site should be allocated for housing

Response: During 2022/23, the existing Wolverhampton City Centre AAP housing allocation at this site became unsuitable for housing because of highways access constraints and the need to retain the site for education use, as detailed in the SHLAA 2024.

- Site allocations located in proximity to Dudley should take account of potential cross-boundary issues, particularly education provision.

Response: WCC has engaged closely with Dudley MBC throughout the WLP preparation process, and there is on-going co-operation regarding school place provision. No cross-boundary issues have been highlighted regarding these sites, in terms of character impacts or infrastructure provision.

4.10 The housing site allocation process for the WLP Regulation 19 involved drawing together various strands of evidence - the SHLAA 2024; the WLP Site Assessment Report Nov 2024; the Strategic Flood Risk Assessment Level 2 [SD EN14]; the views of WCC Highways Officers and the results of the Black Country Transport Modelling [SD TR1, TR1a-e, TR2]; the Wolverhampton Open Space Strategy and Action Plan 2024 [SD EN12]; Heritage Impact Assessments [SD EN19]; wastewater advice from Severn Trent and the Environment Agency [SD EN7 and EN8]; the WLP Habitat Regulations Assessment relating to Cannock Chase SAC impacts [SD CD22] and Local Site Assessment Reports [SD EN17a-x]. The potential impacts of the new national Biodiversity Net Gain policy on each site allocation was also taken into account. The results are presented in WLP Table 12 of Section 13, which sets out site policies with specific policy requirements for each site allocation. Any impacts of WLP evidence on housing capacity have been fed back into the SHLAA 2024.

4.11 The WLP Regulation 19 consultation brought up some new issues relating to housing site allocations, as set out on pages 117-129 of the WLP Regulation 22 Consultation Statement [SD CD8a]:

- H1 Bluebird Industrial Estate and site to rear, Park Lane should not be allocated or should have protections to enable development of large cold store on adjoining land

Response: There are limited housing development opportunities in Wolverhampton, in the context of a significant level of housing need which the WLP must address. Site H1 is an existing housing allocation in the Stafford Road Corridor AAP, with recent developer interest. Therefore, the site has been reinstated into the SHLAA 2024 as deliverable for housing over the Plan period. There is an area of car parking between the CCL site and H1, providing some degree of separation. It is understood that the main impact of the proposed cold store would be visual. Any area of housing on H1 would be further away from the proposed building than existing housing.

- Allocation of H13 Former Pipe Hall, The Orchard, Bilston Town Centre for 38 homes is unjustified (WMCA, the land owner)

Response: It is still the view of the Council that site H13 Former Pipe Hall has the potential to accommodate 38 homes, taking into account heritage constraints and the potential future availability of external funding to mitigate viability issues. Therefore, there is currently insufficient evidence to recommend making any change to the WLP regarding housing allocation H13. Notwithstanding this, any planning application for alternative uses will be considered on its own merits.

- Non-allocation of Wednesfield Police Station site for housing (Police Commissioner for the West Midlands, the land owner)

Response: The Wednesfield Police Station is a previously developed site which will be incorporated into the next update to the 2024 SHLAA. It is not necessary for the site to be allocated for housing in the WLP, nor for the housing capacity to be added to WLP housing supply figures, as the site, if suitable, can be developed for housing

under existing adopted local planning policies covering Wolverhampton, is part of windfall supply.

Policy HOU1 Housing Requirement

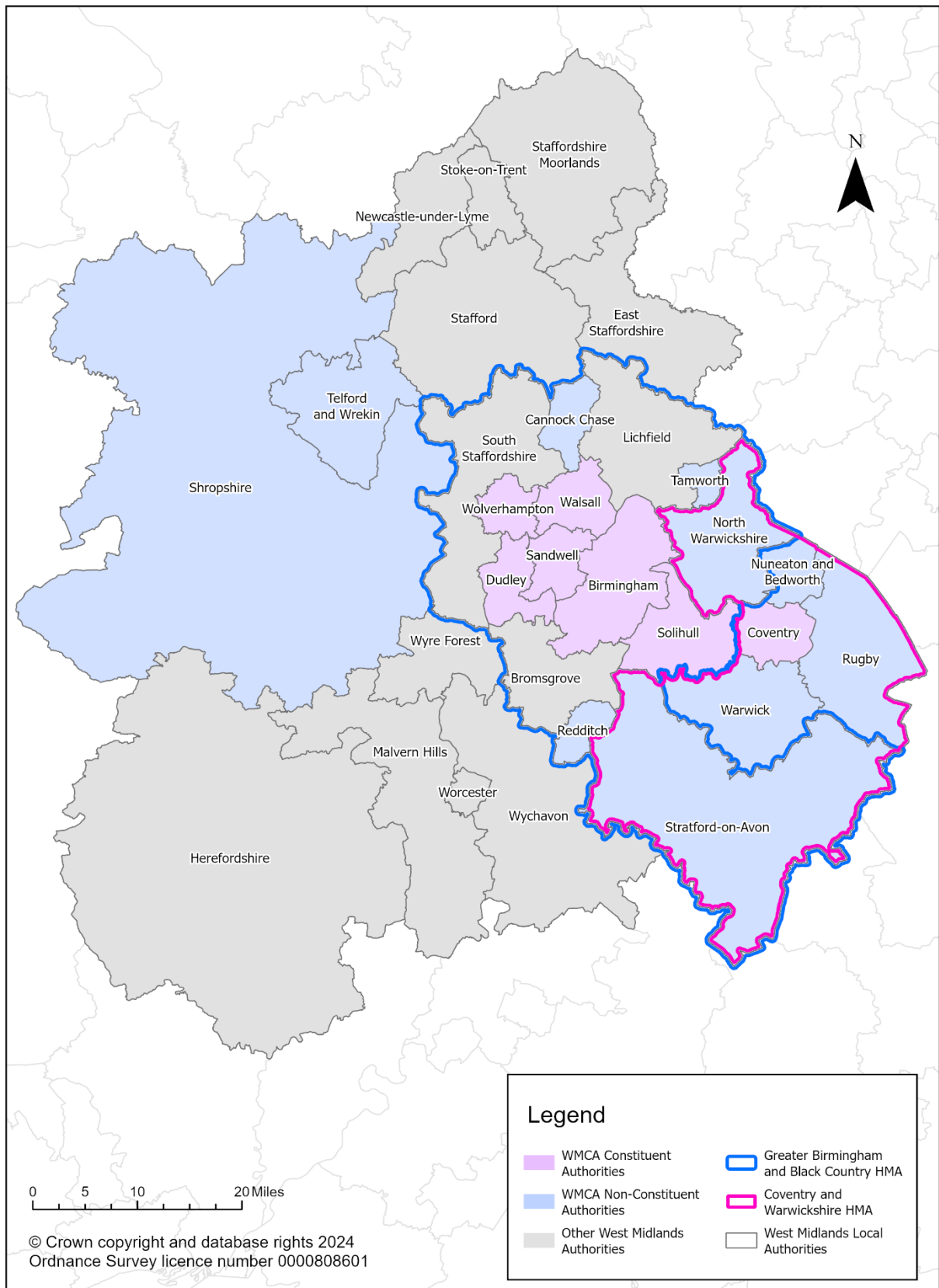
- 4.12 The WLP housing requirement of 9,330 homes by 2042 is set out in WLP Policy HOU1. This is based on the total housing supply 2024-42 set out in para's 3.38-3.39 above and will deliver a 9% increase in housing stock. 97% of supply is on brownfield land and 3% of supply is on greenfield land. A balanced range of sites has been provided, in terms of size, location and market attractiveness, which will help to maximise housing delivery over the Plan period. 38% of identified supply is on sites of under 1 ha, well above the 10% required in the NPPF (paragraph 70).
- 4.13 The Plan period has been divided into three phases, covering five years, ten years, and 15 years from the anticipated year of adoption - 2027. A housing target for each phase is provided in WLP Table 4, which is based on consistent achievement of 518 homes per annum. The WLP housing trajectory set out in WLP Appendix 2 (with further detail provided in the SHLAA 2024) demonstrates a relatively steady supply of housing completions over the Plan period, justifying consistent housing targets.
- 4.14 The WLP housing requirement is positively prepared and justified having regard to identified constraints. As set out above all sources of land have been fully considered, including sites promoted for development by stakeholders and land identified proactively by WCC. The WLP housing requirement is supply led - the extent to which Wolverhampton can meet its LHN, and potentially contribute towards unmet need arising elsewhere, is guided by the availability and suitability of sites following the principles set out in the NPPF 2023.
- 4.15 The WLP will accommodate 47% of current local housing need up to 2042 (19,728 homes) within Wolverhampton. It is not possible to deliver the entirety of the WLP housing need within Wolverhampton. Making the best use of brownfield land does not mean that all such land is available for housing development - land is also required for employment and other land uses.
- 4.16 The potential to deliver of the remainder of Wolverhampton's LHN – 10,398 homes - is being explored with neighbouring local authorities under the Duty to Co-operate (DtC), as set out in section 5 below.

5. The WLP Housing Shortfall and Duty to Cooperate (DtC)

- 5.1 The WLP Regulation 19 generates a housing shortfall of 10,398 homes over the period 2024-42. This section clarifies how the WLP preparation process has sought to address the emerging and final WLP housing shortfall, the relationship between the WLP shortfalls and other housing shortfalls across the wider region, and how the implications of not addressing the WLP housing shortfall have been assessed.

Regional Housing DtC Work

- 5.2 There is a long history of DtC work to address unmet housing need across the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) within which Wolverhampton is located (shown on the map below), and beyond. This work began in 2017, when the Birmingham Development Plan evidenced a 37,900 home shortfall up to 2031, and the GBBC HMA was established. Regular GBBC HMA officer Working Group meetings began in 2018 and form a key part of the DtC process for Local Plans across the region. Minutes of these meetings are available [ED WCC5 Appendix 5], redacted to remove agenda items, and discussions on these, which are commercially sensitive or do not relate specifically to the Local Plan process. For the past four years, WCC has chaired these meetings and employed the WM Strategic Planning Advisor, and has initiated key elements of the group work programme. Other neighbouring authorities (Shropshire, Telford & Wrekin, Coventry, Nuneaton & Bedworth, Warwick, Wyre Forest), WMCA and Transport for West Midlands also take part in these meetings and work. The group was renamed West Midlands Development Needs Group during 2022 to cover strategic employment issues and infrastructure.
- 5.3 The GBBC HMA Group has completed a Strategic Growth Study (2018), regular Housing Position Statements (2018; 2020; 2021; 2023) ([Greater Birmingham and Black Country Housing Market Area Strategic Growth Study | Sandwell Council](#)) and a HMA Statement of Common Ground (SoCG) 2024 [SD CD15b]. A new Housing Growth Study was commissioned in February 2025 to understand the extent of housing shortfall across the GBBC HMA and to develop scenarios designed to address it and is programmed for completion by autumn 2025. The group is now engaged in understanding the implications of the Planning & Infrastructure Bill and the programming and scope of the West Midlands Spatial Development Strategy (SDS). The WMCA Board have recently agreed to initiate work on the SDS in recognition of the pressing DtC issues outlined in this Paper. WCC are a key partner alongside WMCA in this process ([WMCA Board 18 July 2025](#) pp. 47 – 62)



- 5.4 Throughout the BCP preparation process it was clear that a significant housing shortfall would arise, and this was confirmed in the Draft BCP (2021), which, taking into account green belt releases, evidenced a shortfall of 28,239 homes over the period 2020-39. Therefore, the need to address the BCP shortfall was also incorporated into the GBBC HMA DtC work in 2021. Regular Black Country Planning Leads (BCPL) meetings, which began in 2016, form a key part of the on-going DtC process between the BCAs and continued when work on the BCP ceased [ED WCC5 Appendix 5k].
- 5.5 Throughout the BCP and WLP preparation processes, Wolverhampton has evidenced a significant local shortfall against LHN for Local Plan preparation purposes. Therefore, when requested to contribute to housing shortfalls from neighbouring Local Plans (Birmingham, Sandwell, Dudley) WCC has responded that this is not possible ([South Staffordshire Stafford and Birmingham Local Plan Consultation Responses 14 December 2022; Response to Dudley Sandwell and Telford Wrekin Local Plan Consultations 17 January 2024](#)).
- 5.6 Since 2017, a number of emerging Local Plans across the region have made housing offers to help address the GBBC HMA and Black Country housing shortfalls, part of which could be attributable to Wolverhampton. The changing position of these offers is set out in Table 1 below, beginning with the most recent position before end of work on the BCP – established through Association of Black Country Authorities (ABCA) DtC correspondence in April 2022 - and ending with the current position as of July 2025. The GBBC HMA SoCG sets out the housing offer position as of November 2024. The current position of WCC regarding these offers is also presented. For Telford & Wrekin, this position is presented as a range, reflecting the difference between the GBBC HMA SoCG figure based on the Telford & Wrekin Regulation 18 Plan, and the WCC response to the Regulation 19 Plan, which is based on WCC's understanding of updated housing figures.
- 5.7 Since October 2022, for the majority of these Local Plans, WCC has responded to consultations at each stage of Plan preparation, requesting an appropriate housing offer to the emerging WLP. For Cannock Chase and Lichfield Local Plans, WCC relied upon consultation responses from the other BCAs, in line with an approach agreed at BCPL meetings.

Table 1 Evolution of Housing Offers Attributable to Wolverhampton

Local Authority	Offer Position April 2022	Offer Position Feb 2024 (WLP Reg 18)	Offer Position Nov 2024 (WLP Reg 19 / GBBC HMA SoCG)	Offer Position July 2025	Most recent WCC Position
Cannock Chase	500 to GBBC HMA but majority BCA given proximity (Preferred Options March 2021)	500 to Birmingham & BCAs (Reg 19 Feb 2024) Walsall MBC response relied upon (7 March 2024)	500 to Birmingham & BCAs of which 63 for WLP (Submission Nov 2024)	500 to Birmingham & BCAs of which 63 for WLP (Submission Nov 2024)	Support estimated 63 for WLP (Table 2 of GBBC HMA SoCG)
Lichfield	2,665 to GBBC HMA but majority (2,000) to BC given proximity (Reg 19 July 2021)	No offer (Plan withdrawn Oct 2023)	Considering if able to offer to GBBC HMA (Issues and Options Nov 2024) Walsall MBC response relied upon (28 November 2024)	Recent increase in LHN means unlikely to be able to make offer to WLP (Response to WLP Reg 19 DtC letter, Dec 2024)	Plan in early stage of preparation
Shropshire	1,500 to BCA (Shropshire / BCA SoCG July 2021; Submission September 2021)	1,500 to BCA (Shropshire / BCA SoCG July 2021; Submission Sept 2021)	1,500 to Birmingham & BCAs of which 593 for WLP (Shropshire / BCA SoCG update Oct 2024)	No offer – Shropshire LHN has increased significantly (Shropshire DtC Letter Apr 2025 / Plan withdrawn 17 July 2025)	Plan not yet in preparation
Solihull	2,100 to GBBC HMA but majority Birmingham given geographical proximity (Submission May 2021)	2,100 to GBBC HMA but majority Birmingham given geographical proximity (Examination May 2021)	No offer (Plan withdrawn Oct 2024)	Plan in early stage of preparation	Plan in early stage of preparation
South Staffordshire	4,000 to GBBC HMA but majority BCA	4,000 to GBBC HMA but majority BCA	640 to Birmingham & BCAs of which 234 for	640 to Birmingham & BCAs of which 234 for	Support estimated 234 for WLP (Table

	given proximity (Preferred Options Nov 2021)	given migration flows (Preferred Options Nov 2021)	WLP (Reg 19 Apr 2024; South Staffs / WCC SoCG July 2024)	WLP (Submission Dec 2024; South Staffs / WCC SoCG July 2024)	2 of GBBC HMA SoCG)
Stafford	Contribution being sought from up to 2,000 surplus (Issues & Options July 2018)	2,000 to GBBC HMA but majority BCA given migration flows (Preferred Options Oct 2022)	2,000 to GBBC HMA but majority BCA given migration flows (Preferred Options Oct 2022)	No offer (Decision to start Plan under new system Mar 2025)	Plan in early stage of preparation
Telford & Wrekin	Contribution being sought from 3,700 surplus (Issues & Options)	1,600 to BCA (Reg 18 Nov 2023)	1,600 to BCA of which 703 for WLP (Reg 18 Nov 2023)	1,600 to BCA of which 703 for WLP (Reg 18 Nov 2023)	Support estimated 703- 1,077 for WLP (Response to Dudley Sandwell and Telford Wrekin Local Plan Consultations 17 January 2024)
Total housing offer for WLP (following adoption of BCA apportionment approach)			1,593 + part of 2,000 (Stafford)	1,000	1,000-1,374

WLP Issues and Preferred Options (Regulation 18)

- 5.8 The I&PO (para's 5.18 – 5.22) highlighted the likely WLP housing shortfall of around 11,413 homes and the considerable DtC work to date to secure contributions to address the WLP and wider Black Country shortfalls. The I&PO DtC Statement [SD PC6] stated that: "Wolverhampton has evidenced a shortfall in its housing supply" and that unmet housing need was a DtC strategic matter which would continue to be one of the principal cross-boundary issues affecting the preparation of the WLP (para 2.38). Neighbouring authorities and other authorities in the GBBC HMA were specified as DtC Prescribed Bodies for housing.
- 5.9 The housing offers made by neighbouring authorities to address shortfalls were to the Black Country or the GBBC HMA as a whole. To provide certainty for the WLP, it was critical that a specific portion of these potential contributions was secured for Wolverhampton. Therefore, the I&PO proposed and sought views on an evidence-based apportionment approach. The approach uses historic net migration data available since 2003, which provides a sound evidence basis for apportionment, as this clearly demonstrates the strength of long term household flows between authorities. The approach originated in 2022 following discussions between WCC and Birmingham, referenced in BCA, South Staffordshire and Birmingham DtC meeting notes of 31/10/22 [ED WCC5 Appendix 5c] and was subsequently agreed for use by the BCAs at BCPL on 6 June 2024 [ED WCC5 Appendix 5k], and then by all signatories to the GBBC HMA SoCG in November 2024.
- 5.10 There were a number of responses to the I&PO consultation from DtC Prescribed Bodies relating to the housing shortfall, as summarised on pages 40-41 of the WLP Regulation 19 Consultation Statement [SD CD9]. Pages 32, 33 and 47 set out how these main issues have been addressed in the WLP Regulation 19, as summarised below. As referenced in para 4.4, 35.6% of respondents agreed with the Preferred Housing Growth Option (H3) and the proposed apportionment approach to housing contributions from neighbouring authorities for the WLP and 55.6% disagreed. Dudley MBC acknowledged the apportionment approach, whereas Walsall MBC stated that there was not yet a formal agreement.
- Given the scale of the WLP and GBBCHMA housing shortfall, and the shortfall in employment development land, the WLP should include a green belt review
Response: Regarding the need for a green belt review, WCC has chosen not to review the green belt in accordance with NPPF para's 11 and 145.
 - The WLP, or SoCG supporting the WLP, should set out the agreed approach for neighbouring authorities to address Wolverhampton's unmet housing needs
Response: Considerable work has taken place over a number of years, beginning with preparation of the BCP in 2016, with other GBBCHMA authorities and beyond, to secure contributions towards likely unmet housing need in Wolverhampton. A GBBC

HMA SoCG will shortly be available to support submission of the WLP and a new Housing Growth Study will soon be commissioned to look at the potential to accommodate wider housing shortfalls across the GBBC HMA and those areas which have a functional relationship to it.

- 5.11 Between the WLP Regulation 18 and WLP Regulation 19 consultations, a number of key DtC activities took place relating to the housing shortfall. In April / May 2024, SSDC consulted on the South Staffordshire Local Plan (SSLP) Regulation 19 and sent WCC a DtC letter requesting that WCC complete a SoCG to demonstrate that the DtC had been met, which was subsequently completed in July 2024 setting out the position in relation to the SSLP and the WLP [Appendix 6 of SD CD15].
- 5.12 WCC responded ([South Staffordshire Local Plan Consultation Response 22 May 2024.pdf](#)) with the following principle for a response: “Note the SSLP housing target of local housing need plus 640 homes to address the GBBC HMA housing shortfall up to 2041. Given detailed evidence provided by the WLP I&PO that Wolverhampton has a very significant housing shortfall up to 2042, and the close geographical, migration and commuting links between Wolverhampton and South Staffordshire, 72.5% (464) of the 640 homes should be specifically allocated to address the Wolverhampton housing shortfall, in line with a net migration apportionment approach which includes all authorities with an evidenced shortfall.”
- 5.13 At a BCPL meeting on 3 June 2024, WCC raised the need for a Greater Birmingham and Black Country Housing Market Area (GBBC HMA) SoCG explaining the position on housing. This SoCG was subsequently developed by the GBBC HMA Group, and by the time the WLP Regulation 19 was published for consultation, had secured officer agreement for the final wording including the apportionment approach and the implications of this for the division of specific contributions (see para 5.9 and Table 1 above).

Wolverhampton Local Plan Regulation 19 – November 2024

- 5.14 The WLP Regulation 19 updated housing need, supply and shortfall figures as of summer 2024, confirmed a 10,398 home shortfall and maintained the I&PO approach to DtC. Policy CSP1 – Spatial Strategy 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”.
- 5.15 Alongside consultation on the WLP Regulation 19, WCC wrote a DtC letter [ED WCC5 Appendix 6] to all local authorities within the GBBC HMA (Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford-on-Avon, Tamworth, Walsall) and other neighbouring local authorities which had a functional relationship with Wolverhampton in terms of housing or

employment land (Shropshire, Telford and Wrekin, Wyre Forest, Stafford). The letter confirmed the latest position with the WLP and its supporting evidence base and set out WCC's Draft SoCG position regarding housing and other issues. The letter requested information to determine whether each authority was able and willing to contribute towards meeting the housing shortfall of 10,398 homes up to 2042. Six local authorities responded to this request.

- 5.16 **Dudley MBC** [SD CD10/R021] responded that they were unable to contribute towards WLP unmet needs and had identified their own shortfall in the Regulation 19 Dudley Local Plan (October 2024). Subsequently a SoCG was completed between WCC and Dudley [SD CD15d].
- 5.17 **South Staffordshire DC** [SD CD10/R023] responded to reiterate the 640 home offer to the GBBC HMA made in their submitted South Staffordshire Local Plan, in line with the SoCG referred to in para 5.11 above.
- 5.18 **Shropshire CC** [SD CD10/R048] responded to reiterate the 1,500 home offer to the BCAs made in their submitted Shropshire Local Plan, in line with their SoCG with the BCAs [SD CD15 Appendix 5]. The intention to withdraw this offer was subsequently set out in a letter to WCC [ED EXAM1] and confirmed through Council approval to withdraw the Shropshire Local Plan on 17 July 2025 ([17 July 2025](#)).
- 5.19 **Lichfield DC** [SD CD10/R027] responded that their adopted local plan provided 1,000 homes to address HMA unmet needs, and that a recent LHN increase of 160% is likely to restrict the ability of their emerging Local Plan to meet their own needs, and assist with WLP unmet needs.
- 5.20 **Walsall MBC** [SD CD10/R025A] responded that their new Plan (to be prepared under the new system) is very unlikely to be able to identify sufficient land to meet their LHN and therefore they will be unable to contribute to the wider GBBC HMA unmet need.
- 5.21 **Stratford-on-Avon DC** (in consultation with Warwick DC) [SD CD10/R030] responded that the South Warwickshire Local Plan covering their area is at Regulation 18 stage and to accommodate LHN within the area will be a very significant challenge, therefore there would be a "more limited expectation" that the District would be able to address unmet need from surrounding areas (including both the GBBC HMA and the Coventry and Warwickshire HMA).
- 5.22 **Birmingham CC** [SD CD10/R016] responded that their emerging Local Plan is unlikely to be able to meet their own LHN, and therefore they are unlikely to be able to make a meaningful contribution to overall unmet housing need in the GBBC HMA (page 3).

- 5.23 Of those authorities which did not respond to the WLP Regulation 19, **Sandwell MBC** has a Local Plan at Examination with a large housing shortfall, which precludes them from assisting Wolverhampton, as set out in Table 1.

Implications of Not Addressing the Housing Shortfall

- 5.24 WCC and the other GBBC HMA authorities remain committed to addressing the housing shortfalls at local and regional level, as set out in this Topic Paper, in accordance with the preferred Housing Growth Option (Option H3), consulted upon at Regulation 18 stage, and set out in Policy CSP1 of the Regulation 19 WLP. As set out in para's 4.1-4.3 above, the potential impacts arising from not meeting the area's full identified needs have been appropriately assessed through the WLP SA process.

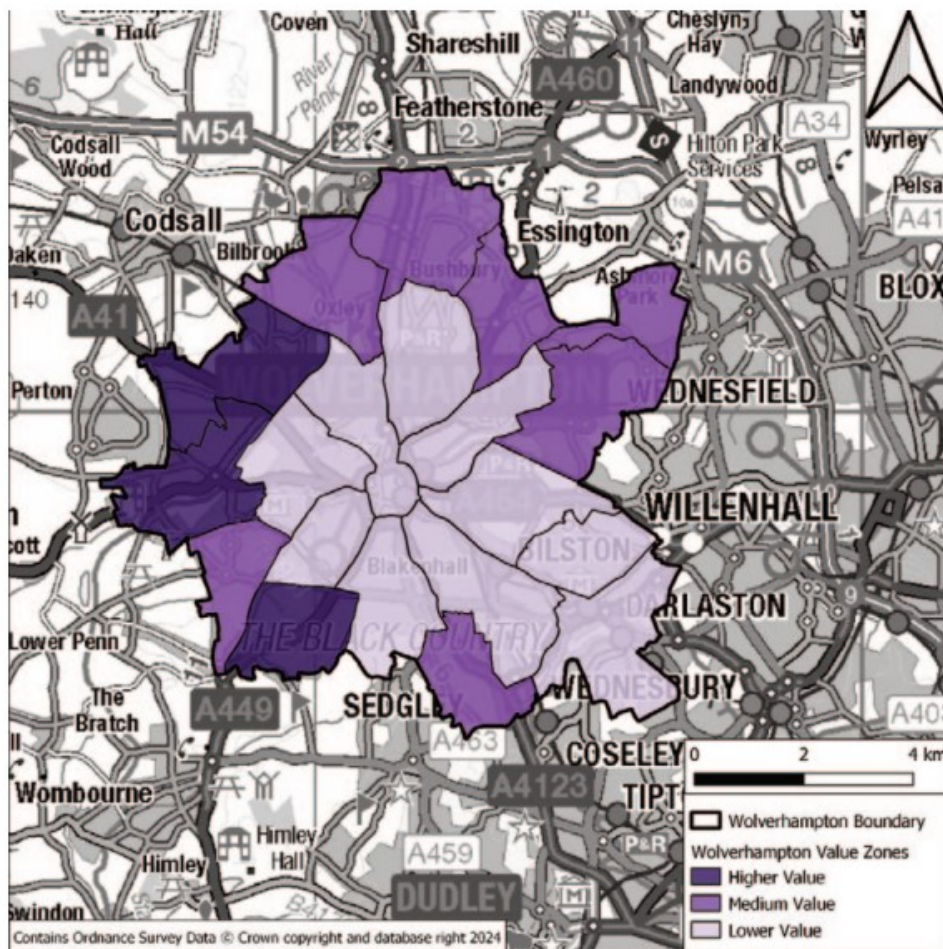
6. Approach to Addressing Affordable Housing Needs

- 6.1 This section sets out the Council's approach to meeting the area's affordable housing needs, including the impact of viability on delivery.
- 6.2 The 2023 NPPF, under which the WLP is being prepared, specifies the following requirements for local authorities for plan making:
- The needs of groups with specific housing requirements are addressed
 - The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including those who require affordable housing
 - Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required
 - Provision of affordable housing should not be sought for residential developments that are not major developments
 - For major development, at least 10% of homes must be available for affordable home ownership, subject to certain exemptions
- 6.3 Additionally, PPG confirms that all households whose needs are not met by the market are effectively in need of affordable housing. NPPF Annex 2 specifies that affordable housing is defined as one or more of the following categories:
- Affordable housing for rent
 - Starter homes
 - Discounted market sales housing
 - Other affordable routes to home ownership
- 6.4 Rising house prices and low average incomes over a long period have made market housing increasingly unaffordable for many Wolverhampton households. Following the requirements and methodology set out in the NPPF and PPG, the Wolverhampton Housing Market Assessment (HMA) 2024 [SD HO3] identifies a requirement for 17.8% of new homes over the Plan period to be made available for affordable or social rent, 9.1% to be shared ownership and 7.9% to be First Homes. To meet this level of need, 34.8% of new homes would have to be affordable – or 180 gross homes per year on average over the Plan period 2024-42. In comparison, there were 119 affordable gross completions in 2023/24 [SD CD14 page 9]
- 6.5 The WLP Regulation 19 sets out the WCC aspiration to provide this level of affordable housing through a range of schemes delivering up to 100% affordable housing, funded through grant and other financial sources, and supported by developer contributions where viable, in accordance with WLP Policy HOU3. However, it is recognised that, in past decades, given viability constraints affecting many housing sites, the majority of affordable housing

provided in Wolverhampton has been funded through subsidy from WCC and grant. These levels of subsidy have been constrained by Government policy and fall outside the scope of the WLP.

- 6.6 The WLP Viability Assessment 2024 [SD IN3] demonstrates that viability on housing sites in Wolverhampton varies according to local housing values, as set out in WLP Figure 5 reproduced below. Therefore, a sliding scale of affordable housing requirements, ranging from 10% to 15%, has been set out in Policy HOU3 which reflects this variation. This is an evolution of the approach set out in the Draft BCP based on the BCP Viability Assessment [SD IN6].

Figure 5: Wolverhampton Housing Value Zones



(Source: Wolverhampton Viability Study 2024)

- 6.7 This approach should ensure that viability appraisals are not required at planning application stage for the majority of sites. However, viability issues can vary significantly from site to site and are often caused by poor ground conditions, the extent of which cannot be accurately assessed until planning application stage. Therefore, to maximise delivery of affordable housing over the Plan period, Policy HOU3 allows for affordable housing to be sought on all eligible sites, assessment of viability on a site by site basis where required, and use of a flexible approach to allow for changing market conditions.

- 6.8 The tenure of affordable housing to be funded by developers through planning obligations is constrained by national planning policy. The WLP has been prepared under the 2023 NPPF, for the purposes of which the part of the Affordable Homes Update Written Ministerial Statement (May 2021) which requires at least 25% of affordable homes secured through developer contributions to be First Homes tenure, was still extant. First Homes is a specific kind of discounted market sale housing to be sold at 30% below current market value, to eligible persons only, at every future sale. National guidance allowed for evidenced local variations in First Homes requirements, however there was no evidence that such variations are required in Wolverhampton.
- 6.9 Para 66 of the NPPF also requires at least 10% of all homes on major developments (of 10 homes or more) to be affordable home ownership tenure, unless this would “significantly prejudice the ability to meet the identified affordable housing needs of specific groups”. However, the most significant proportion of need in Wolverhampton over the Plan period will be for social or affordable rent homes and the Viability Assessment demonstrates that, in the Lower and Medium Value zones where the majority of housing site allocations are located, it is generally not viable to provide more than 10% affordable housing of any tenure. Therefore, it is clear that, for Wolverhampton, application of the 10% requirement set out in para 66 of the NPPF would significantly prejudice meeting the identified affordable housing needs of a specific group – the specific group in question being the majority of households with identified housing need in Wolverhampton.
- 6.10 Therefore, Policy HOU3 states that, following application of any national First Homes requirement (which has now been removed through the 2024 NPPF), rent will be the tenure of affordable housing sought on the majority of sites over the Plan period.
- 6.11 In order to contribute to the objective of achieving mixed and balanced communities in accordance with NPPF para 64, Policy HOU3 sets out the general requirement for a mix of tenures within each major housing development, whilst allowing for circumstances where this objective is better achieved through a 100% affordable housing development to boost affordable housing provision, or a 100% market housing development with off-site provision of the affordable housing requirement.