

Schedule of Proposed Main Modifications to the Wolverhampton Local Plan

Last updated: 18/09/26

Proposed text changes are denoted by additions being underlined and deletions being ~~struck through~~

Main Modification Reference Number	Page	Para / Policy / Table / Figure	Proposed Change	Soundness Reason for Proposed Modification
MM001	8	Para 1.5	“The WLP sets out <u>all</u> strategic policies for Wolverhampton. The WLP also makes all <u>and</u> housing and employment allocations for the whole of Wolverhampton, except for <u>the area covered by</u> Wolverhampton City Centre <u>as shown on figure 2 of this Plan. ...</u> ”	To clarify the scope of the WLP with relation to Wolverhampton City Centre in particular. (Ref: Council’s response to MIQ 17 b)
MM002	8	Para 1.5	“The WLP <u>strategic policies</u> sits alongside non-strategic policies for Wolverhampton provided in the saved parts of the Wolverhampton Unitary Development Plan (2006 <u>UDP</u>), and Area Actions Plans for Bilston Corridor, Stafford Road Corridor and Wolverhampton City Centre; <u>and also UDP Part 1 policies which function as strategic policies</u> . The policies in these Development Plan Documents, (together with national policies and policies in the Neighbourhood Plans for Tettenhall and Heathfield Park) provide the set of rules against which planning applications in Wolverhampton are assessed. A future review of the Wolverhampton City Centre Area Action Plan will provide up-to-date development allocations for Wolverhampton City Centre. ”	To clarify the scope of the WLP with respect to strategic policies, and the relationship with other retained policies covering Wolverhampton. To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan. (Ref: Council’s response to MIQ 17 b) and 18 a)
MM003	10	Para 1.17	“To facilitate this, the WLP has the same scope as the BCP – covering all strategic policies for Wolverhampton;	To clarify the scope of the WLP with relation to Wolverhampton City Centre in particular.

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			and also providing all housing and employment allocations for the City, with the exception of sites within housing allocations within the area covered by Wolverhampton City Centre, as defined in Figure 2. Instead, the WLP sets out a deliverable housing target for the city centre based on up-to-date evidence. This gap will be filled by a review of the Wolverhampton City Centre AAP to The update of allocations within the City Centre (in the saved parts of the Wolverhampton City Centre AAP, with updated information in the SHLAA) will be delivered through preparation of the new Wolverhampton Plan during 2026-29 to provide up-to-date site allocations for the city centre area.	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan. (Ref: Council’s response to MIQ 17 b and 18 a)
MM004	48	Para 3.10	“... Although this plan does not make development <u>housing</u> allocations within Wolverhampton City Centre, it sets out a deliverable development <u>development housing</u> targets for the city centre, based on up-to-date evidence, which will be met through a review of the Wolverhampton City Centre Area Action Plan <u>reviewed as part of the preparation of the new Wolverhampton Plan during 2026-29.</u>”	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council’s response to MIQ 18 a)
MM005	51	Para 3.20	“...This will be achieved, in particular, through: Policy CSP1 which sets out the critical role of Wolverhampton City Centre as the key driver to deliver the overall spatial strategy; Policy CEN2 which sets out the role of the city centre in the Wolverhampton hierarchy of	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system.

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			centres; more detailed policies to be developed through the Wolverhampton City Centre AAP review; and a range of city centre regeneration projects being promoted by the Council and partners.	(Ref: Council's response to MIQ 18 a)
MM006	56	Delivery section	“ Review of Wolverhampton City Centre Area Action Plan”	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council's response to MIQ 18 a)
MM007	62	Para 4.10	“...The detailed spatial aspects of implementation and delivery for Wolverhampton City Centre will be set out as part of a review of the Wolverhampton City Centre Area Action Plan <u>the preparation of the new Wolverhampton Plan.</u>	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council's response to MIQ 18 a)
MM008	89	Policy HOU1 Point 2	“... Additional housing supply will also be secured on windfall sites throughout the urban area and through the update of allocations in the Wolverhampton City Centre Area Action Plan, where appropriate.”	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (ref: Council's response to MIQ 18 a)
MM009	93	Para 6.11	“... Existing allocations will be reviewed and new allocations may be made in line with housing targets when the Wolverhampton City Centre Area Action Plan	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new

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			is reviewed prepared immediately following adoption of the WLP during 2026-29.”	Wolverhampton Plan under the new planning system. (Ref: Council’s response to MIQ 18 a)
MM010	94	Delivery section	“ Review of Wolverhampton City Centre Area Action Plan	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council’s response to MIQ 18 a)
MM011	137	Para 8.3	“Whilst the WLP does not allocate housing sites within Wolverhampton City Centre ... b) bringing forward guidance, policies and allocations in future Development Plan Documents (particularly the Wolverhampton City Centre Area Action Plan review) to facilitate the consolidation, diversification, enhancement, protection and regeneration of Wolverhampton’s centres.”	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council’s response to MIQ 18 a)
MM012	146	Para 8.14	“The approach set out in Policy CEN1 supports more detailed policies in Development Plan Documents and Neighbourhood Plans, and other future Development Plan Documents (particularly the Wolverhampton City Centre AAP review), which may adjust centre boundaries, designate new local centres, or remove existing local centres from the hierarchy.”	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council’s response to MIQ 18 a)
MM013	147	Para 8.15	“... This policy will inform the development of more detailed guidance, policies and allocations in future	To update the position on the Wolverhampton City Centre AAP review – that this will now be

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			Development Plan Documents, especially through the Wolverhampton City Centre Area Action Plan review.	rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council's response to MIQ 18 a)
MM014	151	Para 8.23	"... The housing target for Wolverhampton City Centre will be delivered through the future review of the Wolverhampton City Centre Area Action Plan reviewed <u>through preparation of the new Wolverhampton Plan during 2026-29.</u> "	To update the position on the Wolverhampton City Centre AAP review – that this will now be rolled into preparation of the new Wolverhampton Plan under the new planning system. (Ref: Council's response to MIQ 18 a)
MM015	60	Delivery section	" Preparation of Supplementary Planning Documents , development briefs and masterplans for specific sites and areas, as appropriate	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council's response to MIQ 19)
MM016	79	Para 5.22	"The council's current Hot Food Takeaway Supplementary Planning Document 2018, which restricts hot food takeaways within 400m of secondary schools, will be reviewed and updated as part of a Healthy Places Supplementary Planning Document. "	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council's response to MIQ 19)
MM017	86	Para 5.44	"It is the Council's intention to issue more detailed guidance on the methodology used for calculating developer contributions in the form of a Supplementary Planning Document <u>to be developed in partnership with the ICB. Applicants should consult the ICB in advance of the submission of a planning application where a significant amount of housing is to be provided.</u> "	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council's response to MIQ 19)

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MM018	87	Delivery section	“ Through the planning application process and preparation of a Supplementary Planning Document <u>detailed guidance on the methodology used for calculating developer contributions.</u>”	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)
MM019	144	Para 8.9	“ The Wolverhampton Hot Food Takeaway SPD (which will be reviewed and updated as part of a Healthy Places SPD);”	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)
MM020	169	Delivery section	“ Delivery of this policy will be through the planning application process and via Planning Obligations or other legal and funding mechanisms. Detail will be set out in appropriate Supplementary Planning Documents <u>and guidance.</u>”	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)
MM021	173	Policy TRAN5 – Creating Coherent Networks for Cycling and for Walking	“6. The number of cycle parking spaces required in new developments and in public realm schemes will be determined by local standards set out in <u>guidance</u> Supplementary Planning Documents.”	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)

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MM022	230	Para 10.127	“A Black Country Air Quality Supplementary Planning Document (SPD) was adopted in 2016, building on work undertaken for the West Midlands Low Emissions Towns and Cities Programme, including the West Midlands Good Practice Air Quality Planning Guidance (2014). The SPD will need to be revisited during the Plan period to take into account changes in national legislation, regulations and targets and regional developments regarding air quality.”	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)
MM023	244	Para 10.153	“... This will reduce carbon emissions from new development, improve design quality and create a high quality environment which will maximise economic competitiveness and housing choice. Implementation of the Policy will be supported by an Energy and Sustainable Design Supplementary Planning Document (which will replace the existing Renewable and Low Carbon Energy Supplementary Planning Document), to be prepared in the context of anticipated changes to Building Regulations to meet Future Homes and Buildings Standards.”	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)
MM024	247	Para 10.155	“... It is particularly important that the energy infrastructure provided to serve larger developments is carefully considered and designed to minimise carbon emissions, in consultation with energy providers and the Local Planning Authority. Further detail will be	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)

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			provided in an Energy and Sustainable Design Supplementary Planning Document.”	
MM025	252	Delivery section	“ Preparation of Energy and Sustainable Design Supplementary Planning Document”	To reflect that, under the new planning system, new SPDs cannot now be prepared. (Ref: Council’s response to MIQ 19)
MM026	44	Para 3.3	“...To accommodate this future growth, locations that are both sustainable and deliverable have been identified for development, at levels and in locations that do not breach the environmental capacity and <u>strategic infrastructure limits</u> of the area.”	To strengthen the supporting text for Policy CSP1 regarding the sufficiency of strategic infrastructure to support growth. (Ref: Council’s response to MIQ 27)
MM027	44	Para 3.4	“The spatial strategy is based on a number of considerations, including: a) National planning policy; b) The Plan’s Vision, objectives and aims; c) Environmental constraints; d) The availability and viability of land for development; <u>e) Existing infrastructure and planned improvements.</u> ”	To strengthen the supporting text for Policy CSP1 regarding the sufficiency of strategic infrastructure to support growth, subject to planned improvements by service providers. (Ref: Council’s response to MIQ 27)
MM028	44	Para 3.5	“... By promoting the right type and amount of development in the most sustainable locations, the Strategy therefore plays a crucial role in delivering an inclusive Wolverhampton that supports communities to achieve their goals. <u>The Wolverhampton Infrastructure Delivery Plan demonstrates the sufficiency of strategic infrastructure to support growth, subject to planned improvements by service providers and national initiatives to address projected increased electricity demands in particular.</u> ”	To strengthen the supporting text for Policies CSP1 and DEL1 – Infrastructure Provision regarding the sufficiency of infrastructure to support growth, subject to planned improvements by service providers and national initiatives to address projected increased electricity demands, by reference to the supporting evidence provided in the IDP (Ref: Council’s response to MIQ 27)

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MM029	56	Evidence section	“ • <u>Wolverhampton Infrastructure Delivery Plan</u>”	To strengthen the supporting text for Policy CSP1 by reference to the supporting evidence provided in the IDP, to demonstrate the sufficiency of existing and planned infrastructure to support growth. (Ref: Council’s response to MIQ 27)
MM030	64	Para 4.19	“The scale of growth proposed in the WLP will could have significant impacts on the local environment and the capacity of a range of infrastructure and facilities. <u>The Wolverhampton Infrastructure Delivery Plan demonstrates the sufficiency of strategic infrastructure to support growth, subject to planned improvements by service providers and national initiatives to address projected increased electricity demands in particular.</u> It is important that the appropriate investment takes place to ensure, future development is sustainable. ...”	To strengthen the supporting text for Policy DEL1 – Infrastructure Provision regarding the sufficiency of infrastructure to support growth by reference to the supporting evidence provided in the IDP, subject to planned improvements by service providers and national initiatives to address projected increased electricity demands. (Ref: Council’s response to MIQ 27)
MM031	45	Para 3.9	“...This growth will be supported by transport investment, focused on enhancing the rail and rapid transit network and the key road corridors and investment in walking and cycling, <u>focusing on the priorities for development of the transport network set out in Policy TRAN1.</u>	To strengthen the supporting text for Policy CSP1 by linking to the priorities for development of the transport network set out under Policy TRAN1 (Ref: Council’s response to MIQ 27)
MM032	41	Policy CSP1 – Spatial Strategy	“... c) Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs <u>requirements.</u>”	To reflect the distinction between objectively assessed needs and development requirements i.e. the amount of development the WLP is planning for

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		Part 1)		(Ref: Council's response to MIQ 32)
MM033	42	Policy CSP1 – Spatial Strategy Part 3)	3) Table 3 shows how the housing and employment land targets for Wolverhampton will be met. Those development needs that cannot be accommodated within the Wolverhampton administrative area will be exported to sustainable locations in neighbouring local authority areas through the Duty to Cooperate	To address the need for Local Plan policies to relate to the development and use of land within its area. (Ref: Council's response to MIQ 34 a)
	44	Para 3.3	“... at levels and in locations that do not breach the environmental capacity of the area. <u>Those unmet development needs that cannot be accommodated within the Wolverhampton administrative area will be exported to sustainable locations in neighbouring local authority areas through co-operation with neighbouring authorities.</u> ”	To amend the phrase “Duty to Co-operate” to “effective co-operation with neighbouring authorities and relevant bodies” throughout the WLP in light of the removal of the formal Duty to Co-operate as a legal requirement. (Ref: Council's response to MIQ 34 b)
MM034	11	Para 1.22 – 1.23	“The Localism Act (2011) introduced a requirement on all local authorities to co-operate with neighbouring local authorities and other bodies with a regulatory or strategic interest in Local Plan issues. The duty requires ongoing, constructive, and effective engagement on areas of plan-making, which may have strategic cross-boundary implications. The NPPF (para 25) requires local authorities to engage in effective cooperation with neighbouring authorities and relevant bodies on planning issues throughout the Plan process. The WLP	To amend the phrase “Duty to Co-operate” to “effective co-operation with neighbouring authorities and relevant bodies” throughout the WLP in light of the removal of the formal Duty to Co-operate as a legal requirement. (Ref: Council's response to MIQ 34 b)

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			Duty to Co operate Statement demonstrates how the City of Wolverhampton Council has fulfilled this duty <u>requirement</u> through the WLP preparation process, and how the bodies referred to in the Act have helped to shape the WLP. Statements of Common Ground have been agreed with relevant authorities and bodies on key Duty to Co-operate <u>co-operation</u> issues. These build on Duty to Cooperate engagement at a Black Country level associated with the preparation of the BCP as well as direct Wolverhampton engagement with neighbouring local plans, both during that time and in the period following the end of work on the BCP. The outcomes from this work, how it has shaped the emerging WLP, and the approach to addressing the Duty to Cooperate <u>effective co-operation</u> for the WLP is detailed in paragraphs 1.110 - 1.115 below.	
MM035	36-7	Paras 1.110-1.115	Heading: “Duty to Cooperate <u>Effective Co-operation with Neighbouring Authorities and Relevant Bodies</u>” “... The current position on Duty to Cooperate <u>matters effective co-operation with neighbouring authorities and relevant bodies</u> relating to the Wolverhampton Local Plan ...	To amend the phrase “Duty to Co-operate” to “effective co-operation with neighbouring authorities and relevant bodies” throughout the WLP in light of the removal of the formal Duty to Co-operate as a legal requirement. (Ref: Council’s response to MIQ 34 b)

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MM036	108	6.50	“... Duty to Cooperate Requests to neighbouring authorities to provide pitches to help address this unmet need have also been unsuccessful.”	In light of the removal of the formal Duty to Co-operate as a legal requirement. (Ref: Council’s response to MIQ 34 b)
MM037	122	7.17	“The work to export unmet employment land need through the Duty to Cooperate process <u>effective cooperation with neighbouring authorities</u> is ongoing, as evidenced by relevant Statements of Common Ground. ...”	To amend the phrase “Duty to Co-operate” to “effective co-operation with neighbouring authorities and relevant bodies” throughout the WLP in light of the removal of the formal Duty to Co-operate as a legal requirement. (Ref: Council’s response to MIQ 34 b)
MM038	259	11.21	“...It is recognised that ongoing <u>effective cooperation with neighbouring authorities</u> collaboration with relevant local authorities under Duty to Cooperate will be required to ensure waste capacity requirements that cannot be delivered within the city are met in other areas, ...”	To amend the phrase “Duty to Co-operate” to “effective co-operation with neighbouring authorities and relevant bodies” throughout the WLP in light of the removal of the formal Duty to Co-operate as a legal requirement. (Ref: Council’s response to MIQ 34 b)
MM039	275	Delivery	“ Through continued liaison with Minerals Planning Authorities via the Local Aggregates Assessment and the Aggregates Working Party under the Duty to Cooperate”	In light of the removal of the formal Duty to Co-operate as a legal requirement. (Ref: Council’s response to MIQ 34 b)
MM040	41	Policy CSP1 – Spatial Strategy Part 2)	“c) Protecting and enhancing the quality of existing towns and the Neighbourhoods Areas and re-balancing the housing stock by delivering homes supported by jobs and local services;	For clarity, to amend text throughout the WLP to refer to “the Neighbourhoods Area” (Ref: Council’s response to MIQ 36 a)
MM041	43	Policy CSP1 –	“ The Neighbourhoods Areas and Green Belt 7) The Neighbourhoods Areas will provide: ...	For clarity, to amend text throughout the WLP to refer to “the Neighbourhoods Area”

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		Spatial Strategy Part 7)		(Ref: Council's response to MIQ 36 a)
MM042	149	Policy CEN2 – Wolverhampton's Centres Part C (i)	"i As tier-three centres, Wolverhampton's network of 29 District and Local Centres play a crucial role as a key focus for, and serving the needs of, local communities including Wolverhampton's Growth Network, particularly <u>the Neighbourhoods Areas</u> (Policy CSP1).	For clarity, to amend text throughout the WLP to refer to "the Neighbourhoods Area" (Ref: Council's response to MIQ 36 a)
MM043	152	Para 8.28	"...particularly future development in Wolverhampton's Growth Network and housing development in <u>the Neighbourhoods Areas</u> (Policy CSP1 (7) ..."	For clarity, to amend text throughout the WLP to refer to "the Neighbourhoods Area" (Ref: Council's response to MIQ 36 a)
MM044	54	Para 3.36	"The Neighbourhoods Area <u>(NA)</u> of the City forms the majority of the built-up area of Wolverhampton and is where most residents live. <u>It refers to those parts of Wolverhampton which do not fall within either the Growth Network or the Green Belt and forms a patchwork of mostly residential areas. The NA covers most of the western half of the City, intersected by wedges of green belt. In the eastern half of the City, the NA fills the gaps between the hub of the City Centre and the spokes of the Core Regeneration Areas. The Neighbourhoods Area NA includes Tettenhall and Penn to the west ..."</u>	To express more clearly in the WLP the characteristics of the Neighbourhoods Area. (Ref: Council's response to MIQ 36 a)
MM045	33	Para 1.105	"The preferred growth options and the preferred spatial option which were consulted on at Issues and Preferred	To ensure that the WLP overall housing requirement, and housing targets for various

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			Options stage have been taken forward in this Plan (following amendments to update figures <u>as of 2026</u> including the updated <u>housing and</u> employment land requirement) as detailed below: Table - 2 nd column: “... Around 8,850 <u>8,411</u> homes on existing supply in urban area ... Around 419 <u>337</u> homes from density uplift and structural change in Centres Around 10,398 <u>10,920</u> homes exported through Duty to Cooperate”	elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM046	36	Para 1.111	“As set out above, the Plan sets a housing target <u>requirement</u> for Wolverhampton of 9,330 <u>8,809</u> new homes over the period 2024-42, compared to a local housing need for 19,728 homes, creating a shortfall of 10,398 <u>10,920</u> homes. ...”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. To ensure the term “housing requirement” is used throughout the WLP, so that it is justified and consistent with national policy. (Ref: Council’s responses to MIQ 51 and 53)
MM047	41-43	Policy CSP1 – Spatial Strategy Part 1)	Part 1) “ ... a) Deliver at least 9,330 <u>8,809</u> net new homes and create sustainable mixed communities Part 5)	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore

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			“...c) 4,676 <u>4,230</u> new homes of mixed type and tenure - the majority built at high densities as part of mixed use developments; Part 6) “ ...d) A minimum of 2,038 <u>1,644</u> new homes in sustainable locations well-supported by ...” Part 7) “...b) A minimum of 2,616 <u>2,226</u> new homes through: ...”	justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM048	44	Para 3.3	“...economic recovery and growth, enhanced business productivity and 9,330 <u>8,809</u> new homes within the plan period. ...”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM049	45	Para 3.8	“This Plan supports the delivery of 9,330 <u>8,809</u> new homes and ...”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM050	47	Table 3: Spatial	Replace existing 2 nd column with:	To ensure that the WLP overall housing requirement, and housing targets for various

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		Distribution of Housing and Employment Growth	“Identified Sites: 4,194 <u>3,791</u> Small Site Windfalls: 273 <u>231</u> Structural Change Surplus Floorspace: 209 Total: 4,676 <u>4,230</u>” “Housing Site Allocations: 121 Other sites: 38 Total: 159 <u>121</u>” “Housing Site Allocations: 484 <u>576</u> Other sites: 116 <u>94</u> Wednesfield Town Centre Small Site Windfalls and Structural Change Surplus Floorspace: 19 <u>18</u> Total: 619 <u>688</u>” “Housing Site Allocations: 976 <u>520</u> Other sites: 207 <u>216</u> Bilston Town Centre Small Site Windfalls and Structural Change Surplus Floorspace: 77 <u>99</u> Total: 1,260 <u>835</u>” “6,714 <u>5,753</u> (72% 65%)” “Identified Sites: 913 <u>792</u> Small Site Windfalls: 1,703 <u>1,434</u> Total: 2,616 <u>2,226</u> (28% 26%)” “7,979 <u>7,979</u>” <u>Net completions 2024-26: 830 (9%)</u> 9,330 <u>8,809</u> (100%)”	elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM051	48	Para 3.14	“... Plan period to meet a consistent housing target <u>requirement</u> of 518 <u>489</u> homes per annum (Policy HOU1).”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. To ensure the term “housing requirement” is used throughout the

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				WLP, so that it is justified and consistent with national policy. (Ref: Council's responses to MIQ 51 and MIQ 53)
MM052	89	Policy HOU1 – Delivering Sustainable Housing Growth	“1. Sufficient land will be provided to deliver the <u>housing requirement of 489 net homes per annum, totalling at least 9,330 8,809</u> net new homes over the Plan period 2024 – 2042. ...”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council's responses to MIQ 51 and MIQ 54 a)
MM053	91	Table 4: Wolverhampton Housing Land Supply	“Table 4: Wolverhampton Housing Land Supply and Indicative Phasing 2024-42” Remove columns 4, 5 and 6 Amend row “Total Net Homes <u>2026-42</u>” and add a row below this: “<u>Completions 2024-26 (Net); 830</u>” Amend row: “Phased Housing Targets <u>Total Net Homes 2024-42; 7,979</u>” 1st column: “Current Supply as of April 2024 <u>2026</u>” 2nd column: “Sites with Other Commitment (as set out in 2024 <u>2026</u> SHLAA)**” 3rd column: “371 1714 ; 3,150 2,509 ; 7 170; 2,184 1,060; 680 414; 942 256; 273 231; 1,755 1,507; 209; 44; 100; -331 -187; -54 -48; 9,330 8,809; 518 489”	To remove unnecessary phasing of the housing requirement (Ref: Council's response to MIQ 54 a) To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council's response to MIQ 51)

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MM054	92	Para 6.4	“The WLP identifies sufficient land to provide 9,330 <u>8,809</u> additional homes by 2042. This will deliver a 9% increase in housing stock and will accommodate 47% <u>45%</u> of current local housing need up to 2042 (19,728 homes) within Wolverhampton. 97% <u>98%</u> of supply is on brownfield land and 3% <u>2%</u> of supply is on greenfield land. The Housing Key Diagram illustrates the distribution of larger housing sites across Wolverhampton. 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% <u>36%</u> of identified supply is on sites of under 1 ha, well above the 10% required in the NPPF (paragraph 70).”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM055	92	Para 6.5	“a) 2024 <u>2026</u> Strategic Housing Land Availability Assessment (SHLAA) ...”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM056	93	Para 6.11	“... as set out in Table 4 and detailed in the SHLAA (2024) <u>(2026)</u>.”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore

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				justified, positively prepared and consistent with national policy. (Ref: Council's response to MIQ 51)
MM057	89	Policy HOU1 – Delivering Sustainable Housing Growth	“... 3. The minimum housing target over the period 2024-42 and for each of the Plan phases: 2024-32, 2032-37 and 2037-42 is set out in Table 4. ...”	To remove unnecessary phasing of the housing requirement (Ref: Council's response to MIQ 54 a)
MM058	93	Para 6.15	“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 Table 4. These targets are based on the The WLP housing trajectory is set out in Appendix 2, with further detail provided in the 2024 SHLAA. The trajectory demonstrates a relatively steady supply of housing completions over the Plan period, justifying a consistent housing targets requirement throughout the Plan period. As set out in the NPPF (para 76), the City of Wolverhampton Council is seeking to confirm through the WLP the existence of a 5 year housing land supply from the year of adoption (2027). For this purpose, there will be no a 20% buffer applied to housing supply, in line with the most recent Housing Delivery Test results (2022 2025).	To remove unnecessary phasing of the housing requirement (Ref: Council's response to MIQ 54 a) To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. To ensure the term “housing requirement” is used throughout the WLP, so that it is justified and consistent with national policy. (Ref: Council's responses to MIQ 51 and 53)

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MM059	115	Monitoring	3 rd column: “ Phased Housing Targets Requirement set out in Table 4”	To remove unnecessary phasing of the housing requirement. To ensure the term “housing requirement” is used throughout the WLP, so that it is justified and consistent with national policy. (Ref: Council’s responses to MIQ 54 a and 53)
MM060	147	Policy CEN2 – Wolverhampton’s Centres Part 2	“... ii Residential provision will be maximised, to facilitate regeneration and strengthen communities, with a target of 4,676 4,230 new homes for the city centre by 2042, including projects at the Canalside, City Centre West <u>Smithgate</u> and St George’s. ...”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s response to MIQ 51)
MM061	309	Appendix 2: Wolverhampton Local Plan Housing Trajectory	Replace existing trajectory information with that provided in the Housing Topic Paper [ED WCC 2a]	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council’s responses to MIQ 51 and 57)
MM062	22	Evidence Table	“Wolverhampton Strategic Housing Land Availability Assessment (SHLAA); 2024 / <u>2025 / 2026</u> ”	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy.

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				(Ref: Council's response to MIQ 51)
MM063	49	Para 3.16	"... Wolverhampton SHLAA (2024)..."	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council's response to MIQ 51)
MM064	92	Para 6.5	"... Wolverhampton SHLAA (2024)..."	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council's response to MIQ 51)
MM065	93	Para 6.11	"... and detailed in the SHLAA (2024)..."	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council's response to MIQ 51)
MM066	151	Para 8.23	"... Wolverhampton SHLAA (2024), ..."	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and

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				therefore justified, positively prepared and consistent with national policy. (Ref: Council's response to MIQ 51)
MM067	250	Para 10.170	"... in the SHLAA (2024), ..."	To ensure that the WLP overall housing requirement, and housing targets for various elements of housing supply, are in line with 2026 housing land supply, and therefore justified, positively prepared and consistent with national policy. (Ref: Council's response to MIQ 51)
MM068	35	Para 1.111	"... housing target requirement ..."	To ensure the term "housing requirement" is used throughout the WLP, so that it is justified and consistent with national policy. (Ref: Council's response to MIQ 53)
MM069	41	Policy CSP1 – Spatial Strategy	"1) ... to meet strategic planning targets requirements ..." "...3) Table 3 shows how the housing and employment land targets requirements ..."	To ensure the term "housing requirement" is used throughout the WLP, so that it is justified and consistent with national policy. (Ref: Council's response to MIQ 53)
MM070	P.41	CSP1(1(b))	b) Deliver the development of at least 34.9942.9 ha of employment land.	To reflect updated land supply information
MM071	P.42	CSP1(6(b))	c) The principal locations for new industrial and logistics development - providing a minimum of 34.68 42.9 ha of developable employment land to meet growth needs;	To reflect updated land supply information

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MM072	P.45	Para 3.8	This Plan supports the delivery of 9,330 new homes and 34.99 42.9 ha of employment land by 2042	To reflect updated land supply information
MM073	P.47	Table 3	Stafford Road Core Regeneration Area Employment Development Allocations = 5.93 13.17ha (18.8 33%) Wednesfield Core Regeneration Area Employment Development Allocations = 7.95ha (25 20%) Bilston Core Regeneration Area Employment Development Allocations = 16.75 18.36ha (53 47%) Total Growth Network Employment Allocations = 30.63 39.5ha	To reflect updated land supply information
MM74	P.118	Figure 6	Delete sites E1, E18 and E24 from the map	To reflect updated land supply information
MM075	P.120	Policy EMP1(1)	Sufficient land will be provided to deliver at least 34.68 42.9 ha of employment development over the Plan period 2024-42	To reflect updated land supply information
MM076	P.120	Policy EMP1(1(a))	a) development of the Employment Development Sites allocated in this Plan, comprising 30.63 39.5 ha of land; and	To reflect updated land supply information
MM077	P.121	Para 7.13	To contribute towards meeting the evidenced need for 149 ha of employment development	To reflect updated land supply information

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			land in Wolverhampton over the period 2020-42, there have been 31.3922.6 ha of completions during 2020-24, reducing the residual need to 117.6426.4 ha. There are 3.073.4 ha of planning permissions for employment development which are not allocated in this Plan, and there are 30.6339.5 ha of Employment Development Sites allocated in this Plan (as set out in Table 12 of Section 13). To ensure that Employment Development Sites make an effective contribution towards meeting needs, they will be safeguarded for industrial employment uses within Use Classes E(g) (ii), E(g) (iii), B2 and B8, with consideration given to restricting development to these suitable uses through the application of appropriate planning conditions.	
MM078	P.136	Policy EMP1 monitoring indicator	34.6839.5 ha by 2042	To reflect updated land supply information
MM079	P.283	Site E2 (Rear of IMI Marstons, Wobaston Road)	Delete whole row	To reflect site being completed and no longer within the supply.

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		Policies map	Delete site E2 from policies map	
MM080	P.296	Site E18 (Millfields Road, Ettingshall) Policies map	Delete whole row Delete site E18 from policies map	To reflect site being completed and no longer within the supply.
MM081	P.298	Site E24 (Dale St, Bilston) Policies map	Delete whole row Delete site E24 from policies map	To reflect site being completed and no longer within the supply.
MM082	P.34	Employment Growth Options	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access, and explore remaining employment land need to neighbouring authorities: • 24.0133.65 ha on existing employment land supply in urban area • 10.67 ha on new allocations • 82.9383.5 ha exported through Duty to Cooperate	To reflect updated land supply information

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MM083	285	Table 12 Site H2 Former G & P Batteries	3 rd column: "... Subject to biodiversity net gain. <u>Cleared site with full planning permission for 100% affordable housing. Under construction as of August 2026.</u> Heritage Impact: ... 5 th column: "56 <u>31</u> " 7 th column: "2024-32: 56 <u>31</u> (2028-29: 15; 2029-30:16 18; 2030-31: 19; 2031-32: 19)"	To reflect updated housing site information (Ref: Council's response to MIQ 51)
MM084	287	Table 12 Site H6 Heath Town Estate Masterplan – Chervil Rise	2 nd column: "Heath Town Estate Masterplan – Chervil Rise <u>West</u> " 5 th column: "54 <u>37</u> " 7 th column: "2024-32: 54 <u>37</u> (2026-27: 27; 2027 28: 27 37)"	To reflect update housing site information (Ref: Council's response to MIQ 51)
MM085	287	Table 12 Site H7 New Park Village	5 th column: " 188 (-17 net) 186 (-19 net)" 7 th column: "2024-32: 188 186 (2026-27: 93 25; 2027-28: 43; 2028-29: 95-90; 2029-30: 21) (-17-19 net)"	To reflect updated housing site information (Ref: Council's response to MIQ 51)
MM086	289	Table 12 Site H8 Dobbs Street, Blakenhall	3 rd column: " 100% flats. ..." 5 th column: " 266 49 " 7 th column: "2032-37: 266 49 "	To reflect updated housing site information – the site is considered not viable for 266 flats, but viable for 49 homes (Ref: Council's response to MIQ 51)
MM087	289	Table 12 Site H9	7 th column: " 2024-32 2032-37: 100 (2026-27: 50; 2027 28: 50) "	To reflect updated housing site information (Ref: Council's response to MIQ 51)

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		Dudley Road / Bell Place, Blakenhall		
MM088	290	Table 12 Site H10 Royal Hospital Development Area, All Saints	3 rd column: “Cleveland Street part has full planning permission <u>is under construction</u> for 93 homes. 50% flats (of remaining) . Total capacity 295 homes. Any subsequent planning applications would ...HIS required. ”	To reflect update housing site information – the final phase is partially constructed and due to be completed March 2027 and therefore no policy guidance is required for this site in the WLP. (Ref: Council’s response to MIQ 51)
MM089	291	Table 12 Site H13 Former Pipe Hall Policies Map	Delete whole row Delete Site H13 from Policies Map	To reflect updated housing site information – the site is considered not viable for housing and programmed for non-residential use (Ref: Council’s response to MIQ 51)
MM090	292	Table 12 Site H15 Greenway Road, Bradley	3 rd column: “Replaces Bilston Corridor Area Action Plan allocation H6. Occupied employment land. <u>Part (Land at Hatton Street) has full application for 51 homes.</u> Remainder of site s Suitable for a density of 45 dph subject to access improvements (Policy HOU3). ...” 5 th column: “ 180 167” 7 th column: “ 2024-32: 51 2037-42:180 116”	To reflect updated housing site information (Ref: Council’s response to MIQ 51)

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MM091	293	Table 12 Site H16 Former Loxdale Primary School	7 th column: “(2029-30: 33; 2030-31: 33; 2031-32: 34) (<u>2028-29: 100</u>)”	To reflect updated housing site information (Ref: Council’s response to MIQ 51)
MM092	293	Table 12 Site H18 Land at Railway Drive	7 th column: “ 2024-32: 47 (2029-30: 15; 2030-31: 16; 2031-32: 16) <u>2032-37: 47</u> ”	To reflect updated housing site information (Ref: Council’s response to MIQ 51)
MM093	294	Table 12 Site H19 Former Bilston College and adjoining land Policies Map	Delete whole row Delete Site H19 from Policies Map	To reflect updated housing site information – the site is considered not viable for housing and programmed for non-residential use (Ref: Council’s response to MIQ 51)
MM094	299	Table 12 Site H20	2 nd column: “..Woodcross Lane <u>and Land Rear of 45 Rookery Road</u> ” 5 th column: “ 16 <u>38</u> ” 6 th column: “ 0.2572 (G)”	To incorporate adjoining Land at Rear of 45 Rookery Road (SHLAA site 38620) following expiry of planning permission for 22 homes at this site

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		Former Rookery Lodge Policies Map	7 th column: “2032-37: 46-38 <u>See map 1</u> ”	(Ref: Council’s response to MIQ 51)
MM095	293	Table 12 Site H21 Former Stowheath Centres	7 th column: “(2024-32: 53 (2028-29: 53)”	To reflect updated housing site information (Ref: Council’s response to MIQ 51)
MM096	300	Table 12 Site H22 Former Probert Court	3 rd column: “ Subject to relocation of existing GP surgery: ... ” 7 th column: “(2024-32: 35 (2027-28: 35)”	To reflect updated housing site information and provide projected annual housing completions for the 5 year housing land supply period (Ref: Council’s response to MIQ 51)
MM097	300	Table 12 Site H23 Former Gym, Craddock St	3 rd column: “... Plan allocation H4. <u>Cleared site with full planning permission for 100% affordable housing.</u> Heritage Impact: ... ” 5 th column: “ 48 60 ” 7 th column: “2024-32: 48 60 (2028-29: 30; 2029-30: 30)”	To reflect updated housing site information (Ref: Council’s response to MIQ 51)
MM098	107	Para 6.47	“The WLP aims to meet the accommodation needs of gypsies and travellers as defined in the national Planning Policy for Travellers Sites 2015 2024 (PPTS), by	To ensure the WLP accords with the 2024 PPTS definition of gypsy and traveller pitch needs. (Ref: Council’s response to MIQ 71)

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			protecting existing and approving new privately and publicly owned sites and pitches, and by seeking export of unmet need to neighbouring authorities. The GTAA identifies a need for 75 <u>50</u> permanent pitches up to 2032 (including assuming retention of 42 existing authorised pitches), plus 18 <u>22</u> pitches from 2032 to 2042.	
MM099	108	Para 6.52	“The GTAA identifies an additional need for 21 pitches over the Plan period for those families / individuals that do not meet the PPTS definition but do meet the ethnic definition set out in the GTAA and whose needs are not met by bricks and mortar accommodation. This need will also be met within the “broad location” of the urban area, through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies.”	To ensure the WLP accords with the 2024 PPTS definition of gypsy and traveller pitch needs. (Ref: Council’s response to MIQ 71)
MM100	106	Policy HOU5 – Accommodation for Gypsies and Travellers and Travelling	2. Sufficient land will be provided to deliver the <u>requirement for</u> at least 14 additional Gypsy and Traveller permanent pitches by 2032 <u>and 14 pitches in total by 2042</u> . WLP Gypsy and Traveller allocations are detailed in Table 12 of Section 13.”	To ensure the WLP accords with the 2024 PPTS regarding gypsy and traveller pitch requirements. (Ref: Council’s response to MIQ 71)

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		Showpeople		
MM101	107	Para 6.48 – 6.49	“6.48 The evidence supports the following approach towards meeting need up to 2032 <u>2042</u>: ...” “6.49 This approach will deliver 56 <u>14</u> permanent pitches up to 2032, and 14 pitches in total by 2042, as shown in Table 6. This is not sufficient to provide a five-year deliverable supply of pitches from adoption of the WLP in 2027 (as required by the PPTS) the basis of the requirement for 14 pitches for both the period up to 2032 and the period up to 2042, which is set out in Policy HOU5, with a remaining need for 19 pitches up to 2032.”	To ensure the WLP accords with the 2024 PPTS definition of gypsy and traveller pitch needs and regarding gypsy and traveller pitch requirements. (Ref: Council’s response to MIQ 71)
MM102	108	Table 6: Supply of Gypsy and Traveller Pitches	“Table 6: Supply of Gypsy and Traveller Pitches up to 2032 <u>2042</u> “Number of pitches by 2032” Insert new final column: “Number of pitches by 2042: <u>42; 2; 12; 56</u>” Insert new header row between 2nd row and 3rd row: “Supply of new pitches” 5th Row: “Total Pitches: 56 <u>14; 14</u>”	To ensure the WLP accords with the 2024 PPTS regarding gypsy and traveller pitch requirements. (Ref: Council’s responses to MIQ 71, 74 and 75)
MM103	106	Para’s 6.50 – 6.51	“6.50 It is not possible or appropriate to intensify or extend the existing permanent pitch sites, and no further suitable sites have emerged or been identified	To achieve consistency between the preferred growth option (G2) for the WLP set out in the WLP Sustainability Appraisal and the approach

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			within Wolverhampton to address this unmet need. No deliverable site options were put forward through the Black Country Plan and WLP preparation processes, which included three “call for site” opportunities and an assessment of publicly owned land and privately-owned housing sites. Duty to Cooperate requests to neighbouring authorities to provide pitches to help address this unmet need have also been unsuccessful. 6.51 Therefore, remaining needs up to 2032 and beyond will be met within the “broad location” of the urban area, In order to boost the supply of gypsy and traveller permanent pitches over the whole Plan period, Policy HOU5 allows for windfall developments to take place through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies. ... “	to gypsy and traveller pitch provision set out in the WLP under Policy HOU5. (Ref: Council’s responses to MIQ 72 and 77)
MM104	109	Para 6.53	“6.53 There is one existing Travelling Showpeople yard in Wolverhampton, GT5: Phoenix Park Travelling Showpeople Yard - 4 plots, <u>which is protected under Policy HOU5 for this use.</u> It is not possible or appropriate to intensify or extend this site. The GTAA identifies the need for <u>an additional four Travelling Showpeople plots over the Plan period two plots in the period up to 2032 plus two plots from 2032 to 2042.</u> It is not possible to identify and allocate sites to meet this	To ensure the WLP accords with the 2024 PPTS regarding travelling showpeople plot needs and requirements. (Ref: Council’s responses to MIQ 82 and 83)

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			need, as no deliverable site options were put forward through the Black Country Plan and WLP preparation processes, which have included three “call for site” opportunities. Therefore, this need will be met within the “broad location” of the urban area, through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies. ...”	
MM105	106	Policy HOU5	“... WLP Gypsy and Traveller allocations are detailed in Table 12 of Section 13. <u>Sufficient land will be provided to deliver at least four additional travelling showpeople plots over the period 2032-42.</u> ”	To ensure the WLP accords with the 2024 PPTS regarding travelling showpeople plot needs and requirements. (Ref: Council’s responses to MIQ 82 and 83)
MM106	27	Para 1.69	“The WLP has a role in addressing existing health and wellbeing issues in Wolverhampton by providing a built and natural environment that protects health and wellbeing through: supporting the making of healthier choices; <u>access to high quality green spaces;</u> minimising pollution (air, noise, <u>water</u> and other forms); providing healthy homes; <u>blue and green infrastructure;</u> providing a range of employment opportunities ...”	To strengthen alignment with the Natural England Green Infrastructure Framework (2023), the Climate Change Act 2008, and Wolverhampton’s net-zero commitments (Ref: Council’s Response to Birmingham and Black Country Wildlife Trust - CD8a Appendix 2 – R047/1)
MM107	30	Para 1.88	"The WLP will need to create a strategy for the protection and enhancement of the natural environment, <u>including improving ecological connectivity and biodiversity in line with the Local Nature Recovery Strategy,</u> and strengthen the	To support compliance with the Environment Act 2021, which requires local planning authorities to integrate LNRS into their plans.

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			environmental infrastructure network to support sustainable growth.”	(Ref: Council’s Response to Birmingham and Black Country Wildlife Trust - CD8a Appendix 2 – R047/1)
MM108	29	Para 1.80	“Key current and planned transport projects which will improve connectivity within Wolverhampton and with the wider Black Country include A454 City East Gateway, A449 Stafford Road Corridor, A4124 Birmingham New Road, Wolverhampton City Centre public realm and cycling schemes, and electric vehicle charging infrastructure. <u>Local studies are also being undertaken by Network Rail to enhance the West Midlands rail network in line with the West Midlands Strategic Advice (2022).</u> ”	To ensure the potential for rail improvements is referenced. (Ref: Council’s Response to Network Rail - CD8a Appendix 2 – R037/1)
MM109	44	Para 3.7 and 3.15	“... the Plan will protect key environmental assets – the green belt, the network of high quality green and blue spaces, <u>priority habitats and species, biodiversity</u> , and local character and heritage.” “... ‘wedges’ of open land providing valuable open breaks between settlements and access to the wider countryside, including for wildlife, <u>in line with the Local Nature Recovery Strategy priorities and opportunities.</u> ”	To clarify that protection of biodiversity and delivery of the Local Nature Recovery Strategy are key elements of the spatial strategy. (Ref: Council’s Response to Birmingham and Black Country Wildlife Trust - CD8a Appendix 2 – R047/3)
MM110	51	Para 3.19	“..f) Improving the character and quality of both the cultural and civic function of the city centre and the built, <u>historic</u> and natural environment, helping to make	To ensure the strategy for the City Centre references the significance of the historic environment

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			the city centre a sustainable, healthy and attractive place to shop, live, work and visit; ..”	(Ref: Council’s Response to Historic England - CD8a Appendix 2 – R039/2)
MM111	59	Para 3.48	“... Sport England’s Active Design Guidance promotes public health and community activity through building an infrastructure that creates opportunities for all types of physical activity. <u>Applicants are encouraged to use this checklist to self-appraise development proposals</u> , and the Council welcomes its use in designing schemes and housing layouts.”	To clarify that applicants are encouraged to make use of Sport England’s Active Design Guidance (Ref: Council’s Response to Sport England - CD8a Appendix 2 – R007/3)
MM112	60	Policy CSP2 Evidence and Delivery	“Evidence • National Design Guide (MHCLG, 2021) • West Midlands Design Charter (WMCA, 2022) • Black Country Historic Landscape Characterisation Report (Oxford Archaeology, 2019) • Active Design Guidance (Sport England, 2023) • <u>Secured By Design Guidance (UK Policing)</u> • <u>Safer Parking (formerly Park Mark) Guidance (UK Policing)</u> Delivery • Planning application process, legal and funding mechanisms • Preparation of Supplementary Planning Documents, development briefs and masterplans for specific sites and areas, as appropriate • <u>Consultation with West Midlands Police Design Out Crime Officers as appropriate</u>”	To ensure appropriate references are made to Secured By Design and Safer Parking (the new name for Park Mark) to enable effective implementation of Policy CSP2. (Ref: Council’s Response to PCCWM - CD8a Appendix 2 – R042/5)

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MM113	221	Policy ENV10: High Quality Design	"... e) consideration of crime prevention measures and Secured by Design and Park Mark <u>Safer Parking</u> principles, ..."	To ensure appropriate references are made to Safer Parking (the new name for Park Mark) throughout the WLP, and that the definitions of Safer Parking and Secured by Design are clear (Ref: Council's Response to PCCWM - CD8a Appendix 2 – R042/5)
	224	Para 10.101	"Secured by Design and Park Mark <u>Safer Parking</u> provide useful principles ..."	
MM114	62	Para 4.7	"... Assuming that key projects to improve highways, public transport (<u>rail, rapid transit, bus</u>) walking and cycling infrastructure are delivered, as set out in Section 9, it is anticipated that the development of new housing and employment land will not have a significant negative impact on highways infrastructure."	To ensure rail is included in the list of public transport infrastructure relevant to planning for growth (Ref: Council's Response to Network Rail - CD8a Appendix 2 – R037/3)
MM115	64	Para 4.19	"...Impacts on environmental infrastructure can include loss of open space or wildlife habitat on site, <u>or impacts on heritage assets</u> , which must be <u>avoided or mitigated</u> ."	To ensure heritage assets are referenced as infrastructure relevant to Policy DEL1. (Ref: Council's Response to Historic England - CD8a Appendix 2 – R039/3)
MM116	13	Para 1.30	"... A new LTP is being developed <u>and the core strategy as the foundation document</u> which will set out overall aims, vision and approaches to guide the development and delivery of transport policies until the end of 2041. The emerging strategy sets out five motives for change: sustaining economic success; creating a fairer society; supporting local communities and places; becoming more active; and tackling the climate emergency."	To ensure reference to the emerging new West Midlands Local Transport Plan is up-to-date (Ref: Council's Response to Transport for West Midlands - CD8a Appendix 2 – R012/1)

