

Wolverhampton Local Plan Site Assessment Report: Issues and Preferred Options (Regulation 18)

February 2024

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1. Introduction

- 1.1 The WLP will be both a strategic plan and a local plan¹, in that it will seek to allocate the majority of housing and employment development sites necessary to meet housing and employment land need over the Plan period. The Plan will allocate all sites which can accommodate at least 10 homes or 0.4 ha of employment land, with the exception of sites located within Wolverhampton City Centre. The Wolverhampton Local Plan (WLP) Issues and Preferred Options Report identifies a current need for 21,720 homes and 116 ha of employment development land over the Plan period.
- 1.2 The majority of housing and employment development will be delivered on sites in the urban area which are already committed. These comprise: sites under construction and with planning permission; allocations carried forward from adopted Area Action Plans and the Wolverhampton Unitary Development Plan (where still suitable and deliverable); and other suitable sites in the urban area which have been identified in the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) 2023 and the Wolverhampton Employment Land Supply Paper (2024). However, there is a shortfall in the amount of housing and employment land available to meet future needs, as set out in the WLP Issues and Preferred Options Report (2024).
- 1.3 Therefore, there has been a need to review current allocations and other identified sites and then to assess any potential new development sites according to a standard methodology and select those sites which are suitable to consult on as potential new allocations in the WLP through the Issues and Preferred Options consultation.
- 1.4 The site assessment approach which has been applied reflects the City of Wolverhampton Council decision not to review the Wolverhampton Green Belt, as explained below. Therefore, the site assessment methodology only applies to the urban area – that part of the Wolverhampton local authority area which is not designated as green belt.
- 1.5 At the heart of the National Planning Policy Framework (NPPF) is a **presumption in favour of sustainable development** which is detailed in paragraph 11. For plan-making purposes, this means that: “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷.” Footnote 7 clarifies that the policies referred to include land designated as green belt.
- 1.6 In December 2023 there was a key change to national planning policy as set out in paragraph 145 of the NPPF (underlined): “Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where

¹ As defined in the National Planning Policy Framework

exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”

- 1.7 This change means that local authorities preparing a Local Plan, which do not have enough suitable land to meet their housing needs, can now choose whether or not to review the green belt to release land for more housing.
- 1.8 Wolverhampton is a densely developed and constrained urban area with a small amount of green belt land, forming only 11% of the total land area. Much of this green belt land provides important services for the urban area, such as public open space, education and sports facilities, or is of significant value for wildlife, historic character or landscape character.
- 1.9 Therefore, City of Wolverhampton Council has chosen not to review the green belt to address the housing and / or employment development land shortfalls arising from the WLP. This means that none of the spatial options being consulted on involve release of green belt land for development, and no green belt sites will be considered for development or assessed as reasonable alternatives throughout the WLP preparation process.
- 1.10 Therefore this site assessment report considers only potential development sites within the urban area of Wolverhampton, that is all of Wolverhampton excluding that part which is designated as green belt.

2. Site Assessment and Selection Methodology

2.1 This report explains the methodology and the process which was applied by City of Wolverhampton Council to assess and select the most appropriate sites in the urban area for allocation for housing and employment development in the WLP. In accordance with the existing Black Country Core Strategy (2011) spatial strategy and national guidance, the urban area of Wolverhampton was explored for potential development sites and housing density policy tested and adjusted where necessary to maximise housing capacity on these sites, as set out in the Wolverhampton SHLAA (2023). The methodology for assessment and selection of sites within the urban area is set out in Diagram 1.

Wolverhampton City Centre

2.2 The site assessment and selection process does not apply to the area covered by Wolverhampton City Centre (WCC), as shown on the map below. Instead, broad targets for housing, retail and office floorspace have been provided for WCC, based on evidence (a Tier 1 approach). This approach is robust because WCC is covered by a recently adopted detailed Area Action Plan (a Tier 2 approach) and an up-to-date SHLAA report, which sets out detailed evidence and assumptions regarding likely development rates within the City Centre. This additional detailed work, which covers likely windfall rates and the effects of structural change, including potential new allocations, supports the WLP. Therefore, there is sufficient certainty regarding the amount of housing likely to be brought forward in WCC over the WLP Plan period. A Wolverhampton City Centre Supplementary Plan will be prepared under the new Local Plan system which will commence in 2025, to allocate any additional sites required.

Committed Sites

2.3 The following sites are defined as Committed Sites:

- Sites with planning permission;
- Existing Local Plan employment and housing allocations which are not yet built out;
- Other sites identified in the Wolverhampton SHLAA (2023) which are considered suitable and developable for housing use under the current adopted Local Plan for Wolverhampton;
- Other sites identified in the Wolverhampton Employment Land Supply Paper (2024) which are considered suitable and developable for employment use under the current adopted Local Plan for Wolverhampton.

Committed sites have not been subject to a detailed site assessment. This is appropriate because the allocations have been tested at examination in recent years, and all sites have up-to-date information on suitability and deliverability. Effectively, all of these sites have been subject to a “light touch” assessment process, as evidenced in the Wolverhampton SHLAA (2023) and the Wolverhampton Employment Land Supply Paper (2024). This light touch approach has taken into account any changes in evidence or

circumstances, including land-owner views. Housing density assumptions have also been reviewed and density uplifts applied to housing sites where appropriate, where the site is considered unlikely to have planning permission when the WLP is due to be adopted. The Sustainability Appraisal results have also been taken into account, where appropriate.

Site Assessments

- 2.4 During 2017-21 and during 2023, “call for sites” exercises took place seeking the submission of potentially suitable development sites, either for the Black Country as a whole or Wolverhampton specifically. All of the sites in the urban area submitted through the “call for sites” exercises have been subject to a site assessment, except for:
1. Committed sites (see para 2.3);
 2. Sites with a gateway constraint (as set out in Diagram 1)

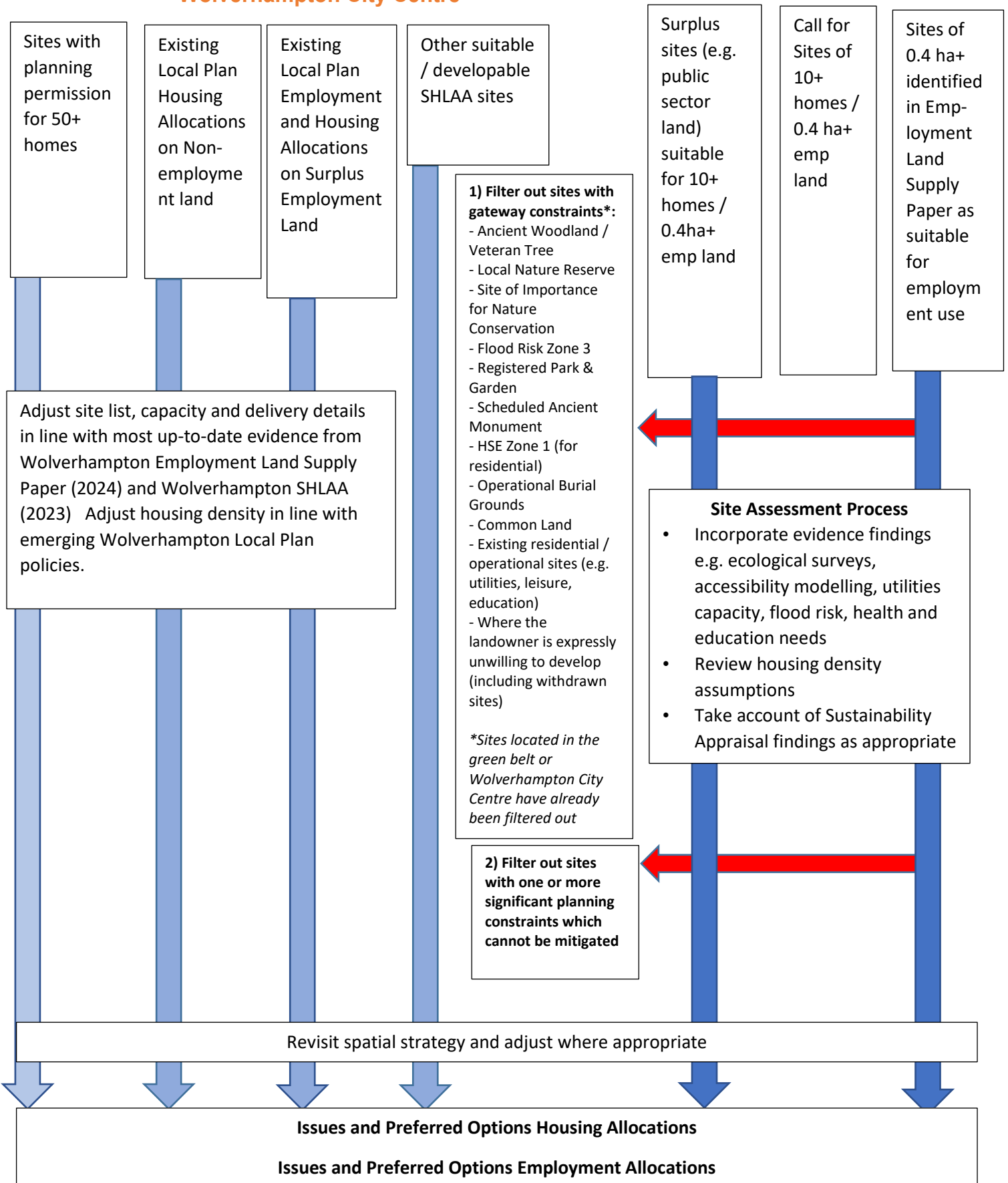
Employment Sites

- 2.5 A site size threshold of 0.4 ha has been applied for employment use in most cases, as set out in Diagram 1. While small sites can provide a constant supply of developable land, in overall terms, they make a limited contribution to the delivery of overall development needs. The availability of such sites can also be difficult to predict and so the Plan adopts assumptions over the yield of such sites over the Plan period based on historic trends. Policies EMP2, EMP3 and EMP4 support the delivery of sites within existing employment areas within which the vast majority of sites of less than 0.4ha are expected to come forward.

Housing Sites

- 2.6 In a large urban area with a significant supply of smaller housing sites coming forward each year, it is considered impractical and unnecessary to allocate all of these smaller sites in the WLP. Therefore, a threshold of 10 homes has generally been used for sites without planning permission and a threshold of 50 homes for sites with planning permission, as set out in Diagram 1. Large housing sites with planning permission have been allocated to ensure that these significant sites are not lost from housing supply to other uses.
- 2.7 It should be noted that, although smaller sites may not be allocated in the WLP, they will be included in the housing land supply figures used in the WLP, subject to appropriate discounts to allow for non-implementation. The housing land supply will also include windfall allowances for certain types of sites within the urban area. Further information is provided in the Wolverhampton SHLAA (2023).

Diagram 1 Site Assessment and Selection Methodology: Urban Area excluding Wolverhampton City Centre



3. Site Assessment Process and Presentation of Results

- 3.1 Appendix 1 provides a summary table (Table 1) and location map to allow for identification of the sites which have been assessed. Table 2 of Appendix 1 provides a list of sites which were submitted through “call for sites” exercises but which have not been subject to a Site Assessment for reasons set out above. These sites have not been subject to Sustainability Appraisal as they are not considered “reasonable alternatives”. For each site assessed, a unique site assessment reference has been allocated e.g. SA-0001-WOL and a Site Assessment Form has been completed and a site plan provided, as set out in Appendix 2. The forms are listed separately: by end use (housing or employment use); and by sites selected and sites not selected.

Sites Assessed for Housing Use

- 3.2 Where sites have been submitted through the call for sites process for housing use, they have been assessed for housing use and supporting residential infrastructure, where appropriate.

Sites Assessed for Employment Use

- 3.3 The basis on which sites have been assessed for employment use is set out in the Wolverhampton Employment Land Supply Paper (2024). In summary, the sites which have been assessed are: those submitted through the call for sites for employment use; sites identified in work associated with the BEAR, including site surveys and landowner engagement; sites with a current or lapsed planning permission for employment use; and sites put forward for consideration for employment development as part of the preparation of Local Plans (excluding existing allocations).
- 3.4 As part of the site assessment process, sites assessed for employment use were market tested to determine their suitability from an occupier and developer perspective.

4. Site Assessment Criteria

4.1 The Site Assessment criteria have been applied using a traffic-light system of assessment, based on a Red, Amber, Green (RAG) methodology, as set out below.

Sensitivity Score	Description	Possible Mitigation
RED	There is a very substantial negative effect or issue that is unlikely to be capable of acceptable mitigation.	No mitigation possible in order to make the site acceptable or significant mitigation required which could prevent the site being acceptable
AMBER	There is a moderate negative effect or issue which may be able to be adequately addressed but only subject to mitigation.	Likely to require low-medium levels of mitigation in order to make the site acceptable
GREEN	There are no effects or issues of significance that require mitigation.	Negligible or no mitigation required to make the site acceptable

4.2 A summary description of each of the Site Assessment criteria, and how the RAG ratings have been applied for each criteria, is set out below. The criteria have been grouped together under the headings:

- 1) Environment
- 2) Economic
- 3) Social

Information is also provided in the form on: Background / Context; Gateway Constraints; Opportunities; and Sustainability Appraisal conclusions, which have also been RAG rated. A Conclusions section at the end of each form summarises the findings of the Site Assessment and, if selected, recommends an appropriate housing or employment land capacity and mix of uses for the site.

4.3 It should be noted that the order of the criteria in the form does not imply a greater level of importance has been applied to any particular criteria.

1) Environmental

Greenfield / Previously Developed Land

Previously Developed Land is defined in the NPPF as: 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.'

Council records and the site visit provide the basis for the assessment of the status of the land. National Planning Guidance supports the reuse of previously developed (brownfield) land in preference to development of greenfield sites.

The categorisation has been made as follows:

Green	No greenfield or greenfield can be incorporated into non-developable area without reducing capacity
Amber	Minority greenfield
Red	Majority greenfield

Topography

Council records and the site visit provide the basis for the assessment of the status of the land.

The categorisation has been made as follows:

Green	No / negligible constraint on capacity
Amber	Minority not developable / viable to remodel site
Red	Majority not developable / unviable to remodel site

Tree Preservation Orders (TPOs) / Mature Trees of Value

Existing Council records of protected trees and a visual assessment made from the site visit of established trees to identify those worthy of retention.

The categorisation has been made as follows:

Green	No relevant trees / negligible impact on site capacity
Amber	Limited development possible without harm to relevant trees or subject to sufficient mitigation
Red	Capacity significantly limited unless harm is caused to relevant trees, which cannot be wholly mitigated

Biodiversity and Geodiversity

Existing Council records inform the status. Ecological appraisals which informed Local Sites Assessments were carried out for the most sensitive sites and their findings are included in the assessment. Impacts on local sites such as these can sometimes be mitigated by providing environmental enhancements to deliver biodiversity net gain on the site or nearby land.

The categorisation has been made as follows:

Green	No habitat / negligible impact on site capacity
Amber	Limited development possible without harm to habitat of SINC / SLINC value or subject to sufficient mitigation
Red	Capacity significantly limited unless harm is caused to habitat of SINC / SLINC value, which cannot be wholly mitigated

Heritage Assets

Council records identify Listed and Locally Listed buildings, Conservation Areas, Scheduled Ancient Monuments and areas of archaeological importance to determine potential harm and any design or separation requirements for development.

The categorisation has been made as follows:

Green	No assets / negligible impact on site capacity
Amber	Limited development possible without harming asset or subject to sufficient mitigation
Red	Capacity significantly limited unless harm is caused to asset(s) which cannot be wholly mitigated

Visual Amenity and Character of the Area

An assessment of the potential impacts of development on the visual amenity of adjacent land users (including existing residents) and local character. Local and wider impacts are considered and whether those impacts are significant and could be mitigated.

The categorisation has been made as follows:

Green	No significant local character or visual amenity impacts / negligible impact on site capacity
Amber	Limited development possible without harming visual amenity / local character or subject to sufficient mitigation
Red	Capacity significantly limited unless harm is caused to visual amenity / local character which cannot be wholly mitigated

Flood Risk, Drainage and Ground Water

The Black Country Strategic Flood Risk Assessment (2020), latest available flood risk information, known drainage issues and potential to provide sustainable urban drainage (SUDS) mitigation was recorded and considered. This may reduce the developable area.

The categorisation has been made as follows:

Green	No drainage / flood risk issues / negligible impact on site capacity
Amber	Drainage or flood risk issues which can be sufficiently mitigated without significantly reducing capacity
Red	Capacity significantly limited due to drainage issues which cannot be mitigated or does not pass SFRA sequential / exception tests

Ground Contamination

Council records and officer assessment on the status of contamination and likely remediation requirements.

The categorisation has been made as follows:

Green	No known issues / negligible constraint on capacity
Amber	Minority not developable / viable to remediate site
Red	Capacity significantly limited / unviable to remediate site

Ground Stability

Council records to identify past mining constraints and fault lines which could be a constraint or barrier to development.

The categorisation has been made as follows:

Green	No known issues / negligible constraint on capacity
Amber	Minority not developable / viable to remediate site
Red	Capacity significantly limited / unviable to remediate site

Air Quality Impact of Adjoining Uses

Nitrogen Dioxide Area of Exceedance Zone maps were considered and any necessary. Officer assessment of both neighbouring uses, their impact on housing or employment development, and any potential impact from such development on existing neighbouring uses were also incorporated into assessments.

The categorisation has been made as follows:

Green	No known issues / negligible constraint on capacity
Amber	Air quality issues which can be sufficiently mitigated without significantly reducing capacity
Red	Capacity significantly limited due to poor air quality which cannot be wholly mitigated

Noise Impact of Adjoining Uses

Officer assessment of both neighbouring uses, their impact on housing or employment development and any potential impact from such development on existing neighbouring uses were also incorporated into assessments.

The categorisation has been made as follows:

Green	No known issues / negligible constraint on capacity
Amber	Noise issues which can be sufficiently mitigated without significantly reducing capacity
Red	Capacity significantly limited due to unacceptable noise levels which cannot be wholly mitigated

Mineral Extraction and Mineral Resource Areas / Mineral Infrastructure and Brickworks

Assessment of the site mineral constraints based on Council records and the Black Country Minerals Study. It is important to prevent the loss of mineral resources from surface developments. The assessment addresses whether sites are within Mineral Safeguarding Areas (MSA) or in close proximity to any mineral extraction sites. Suitable mitigation is suggested where required.

The categorisation has been made as follows:

Green	No mineral extraction or mineral resource / infrastructure constraints
Amber	Site within a Proposed MSA for bedrock sand and gravel, brick clay (Etruria Marl) or fireclay in Walsall; or site is within 250m of an Other Permitted Mineral Infrastructure Site ² or Brickworks
Red	Site is within 250m of a Permitted Mineral Extraction Site and/ or Area of Search or Site is within 250m of a Rail-linked Aggregates Depot

Waste Infrastructure

Black Country Waste Study, Council records and planning history search to identify sites and consider likely impacts. This includes: landfill sites, waste transfer sites, biological treatment of waste sites (composting, anaerobic digestion) and thermal treatment of waste sites (incineration).

The categorisation has been made as follows:

Green	No waste infrastructure constraints
Amber	Site is within 250m of an Other Permitted Waste Site
Red	Site is within 250m of a Proposed Strategic Waste Site

² Other mineral infrastructure sites include secondary/ recycled aggregate production facilities, coating plants (for production of asphalt and roadstone), concrete batching plants, lime/ mortar/ cement works, factories manufacturing concrete products and distribution depots for mineral products.

2) Economic

Employment Development Opportunities

Sites with potential for employment uses were assessed for market attractiveness, drawing on employment evidence from the Black Country Economic Development Needs Assessment (EDNA), Black Country Employment Area Review (BEAR) and Wolverhampton Employment Land Supply Paper.

The categorisation has been made as follows:

Green	Suitable for employment use
Amber	-
Red	Not suitable for employment use

Employment Land

Where existing employment land is being assessed for housing use, the findings of the EDNA and BEAR are referred to where appropriate.

The categorisation has been made as follows:

Green	Surplus to employment needs
Amber	-
Red	Retain for employment

Delivery / Phasing

Site specific findings from the Black Country Viability and Delivery Study (2021) form part of the assessment and any known issues identified through submission details or meetings with developers.

The categorisation has been made as follows:

Green	All capacity deliverable during Plan period
Amber	Part of capacity not deliverable during Plan period
Red	Site not deliverable during Plan period

Viability

Site specific findings from the Black Country Viability and Delivery Study (2021) form part of the assessment, and any known issues identified through submission details or meetings with developers and any issues identified through Council records.

The categorisation has been made as follows:

Green	Viable with Draft Plan obligations
Amber	Marginal viability requiring reduced Draft Plan obligations
Red	Significant capacity limitations / likely to make development unviable without external funding

Availability of Utilities – Electricity, Gas, Water, Sewage Treatment

An assessment based on information provided by submitters and utility providers, the findings of the Utilities Infrastructure Capacity Study (2019) and Water Cycle Study (2020), and the findings of the site visit.

Water utilities companies have a statutory duty to supply water to, and remove waste water from, new development sites and a lack of available capacity does not prevent future development. If capacity is not currently available either existing infrastructure will need to be upgraded or new infrastructure will need to be provided. The infrastructure upgrades required will depend on the amount and location of growth falling within each water catchment area.

The categorisation has been made as follows:

Green	No limitations / negligible impact on development viability
Amber	Some capacity limitation / no significant limits on development viability
Red	Significant capacity limitations / likely to make development unviable

Infrastructure Constraints on / under Site

Such constraints could include electric cables/sub-stations, water/sewage pipes, gas pipes, pylons, culverts and rights of way. Council records and site visit used to determine constraints and provide assessment.

The categorisation has been made as follows:

Green	No limitations / negligible impact on development viability
Amber	Some capacity limitation / no significant limits on development viability
Red	Significant capacity limitations / likely to make development unviable

Highway Access and Transportation

Officer assessment of whether suitable highway access and infrastructure can be achieved for housing or employment uses. Consideration given to safe access for vehicles and pedestrians. Barriers to access could include a reliance on land outside the site assessment boundary without a proven willing landowner.

The categorisation has been made as follows:

Green	No / negligible access constraint
Amber	Access constraints / highway safety impact which can be viably overcome
Red	Access constraints / severe highway safety impact which cannot be viably overcome

Impact on Wider Road Network

Consideration of wider highway constraints such as infrastructure and highway capacity.

The categorisation has been made as follows:

Green	No / negligible impact
Amber	Likely to have unacceptable impacts which can be adequately mitigated
Red	Likely to have unacceptable impacts which cannot be adequately mitigated

3) Social

Access Time by Walking or Public Transport to Key Residential Services

This section uses accessibility mapping and site visit assessments to determine how accessible the site is in relation to primary and secondary schools, health centres, strategic centres, employment areas and food stores, in order to meet the requirements of the proposed WLP housing density and access policy (based on Draft BCP Policy HOU2). Food stores used for the accessibility mapping were above 1000m² - for smaller or well-connected sites a site visit determined whether existing smaller provision was available in closer proximity. Times quoted are walking or public transport distance, except for Primary Schools, which is walking distance only. Please see Appendix 3 of this report for further details on application of the accessibility modelling, which was carried out in 2020 to inform the Draft Black Country Plan.

The categorisation has been made as follows:

	Green	Amber	Red
Primary School	Within 10 mins following any viable mitigation	Within 15 mins following any viable mitigation	Over 15 mins following any viable mitigation
Secondary School	Within 20 mins following any viable mitigation	Within 25 mins following any viable mitigation	Over 25 mins following any viable mitigation
GP / Health Centre / Walk in centre	Within 10 mins following any viable mitigation	Within 15 mins following any viable mitigation	Over 15 mins following any viable mitigation
Strategic Centre/ Employment Area	Within 20 mins following any viable mitigation	Within 30 mins following any viable mitigation	Over 30 mins following any viable mitigation
Centre / Foodstore	Within 10 mins following any viable mitigation	Within 15 mins following any viable mitigation	Over 15 mins following any viable mitigation

Housing Density Location / Character Constraints on Density

The accessibility mapping (as set out above) was used to determine the appropriate housing density for the site, in line with the proposed WLP housing density and access policy. This was then informed by an assessment of local character and any other constraints which were considered could influence appropriate housing density.

Connections to Local Cycle Route Network

Council records to inform an assessment to identify sustainable cycle routes to indicate existing benefits or where improvements could be made.

The categorisation has been made as follows:

Green	Direct connection to site
Amber	Offsite works required to create connection to site
Red	-

Public Open Space

Council records and the most recent local Open Space Assessment / Strategy were used to determine if part or all of the site functions as public open space, whether the open space is surplus against local standards and if suitable mitigation for loss can be achieved.

The categorisation has been made as follows:

Green	Site is not public open space or is public open space which is surplus to local needs with no mitigation necessary
Amber	Site is public open space required to meet local need but part retention / adequate mitigation possible
Red	Site is public open space required to meet local need and not possible to mitigate loss

Loss of Playing Field / Sports Pitches

Council records, site visit and the most recent local Playing Pitch Assessment / Strategy were used to determine if part or all of the site functions as playing field or sports pitch and if suitable mitigation for loss can be achieved.

The categorisation has been made as follows:

Green	Site is not playing field or is playing field which is surplus to local needs with no mitigation necessary
Amber	Site is playing field required to meet local need but part retention / adequate mitigation possible
Red	Site is playing field required to meet local need and not possible to mitigate loss

Other Social

For some sites, or clusters of sites, a shortage of school places has been identified which is likely to need to be addressed through off-site contributions to expand local school place provision. In some cases, the potential need for a new school is identified, which may be provided on site.

4) Other

Opportunities

An assessment of whether development resolves existing issues or whether the site has a favourable relationship with adjoining sites.

Sustainability Appraisal Conclusion

The key findings of the Sustainability Appraisal of the WLP Issues and Preferred Options Report relating to the site.

Conclusion

A summary of the key considerations affecting the site. An explanation of why the site has been selected as suitable for development or the key reasons why the site has not been selected as suitable for development. If the site has been selected as suitable for development, a statement of the appropriate uses for and capacity of the site, given constraints and infrastructure requirements.