

Sustainability Appraisal of the Wolverhampton Local Plan

Regulation 18: Issues and Preferred Options

January 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Wolverhampton Local Plan

Including:
Strategic Environmental Assessment,
Health Impact Assessment and
Equality Impact Assessment

Regulation 18: Issues and Preferred Options

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sustainability effects of the Wolverhampton Local Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms & abbreviations

A&E	Accident and Emergency
AAP	Area Action Plan
AHHLV	Areas of High Historic Landscape Value
AHHTV	Areas of High Historic Townscape Value
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
APA	Archaeological Priority Area
AQMA	Air Quality Management Area
BCCS	Black Country Core Strategy
BCP	Black Country Plan
BMV	Best and most versatile
BNG	Biodiversity Net Gain
CA	Conservation Area
CfS	Call for Sites
CWC	City of Wolverhampton Council
DBEIS	Department for Business, Energy and Industrial Strategy
DEFRA	Department for Environment, Food and Rural Affairs
DLHHV	Designed Landscapes of High Historic Value
DLUHC	Department for Levelling Up, Housing and Communities
DtC	Duty to Cooperate
EDNA	Economic Development Needs Assessment
EqIA	Equality Impact Assessment
EU	European Union
FEMA	Functional Economic Market Area
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
GTAA	Gypsy and Traveller Accommodation Assessment
HEAD	Historic Environment Area Designation
HIA	Health Impact Assessment
HLC	Historic Landscape Characterisation
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LNR	Local Nature Reserve
LTP	Local Transport Plan
MHCLG	Ministry of Housing, Communities and Local Government
NHS	National Health Service
NNR	National Nature Reserve
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PM₁₀	Particulate Matter (10 micrometres)
PPP	Policies Plans and Programmes

PRoW	Public Rights of Way
RIGS	Regionally Important Geological Site
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
WLP	Wolverhampton Local Plan
ZOI	Zone of Influence

Executive summary

About this report

- E1 Lepus Consulting is conducting an appraisal process for City of Wolverhampton Council (CWC) to help them prepare the Wolverhampton Local Plan (WLP). The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages to facilitate iteration between the Plan makers (CWC) and the appraisal team (Lepus Consulting). The process seeks to provide high level environmental protection and the different stages of plan making are mostly accompanied by consultation with statutory bodies, other stakeholders and the public.
- E2 SA is the process of informing and influencing the preparation of a Development Plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the Local Plan.
- E3 This report is being published following consultation with the statutory consultees on the SA Scoping Report, prepared in November 2022, which identified the scope and level of detail to be included in the SA process going forward.
- E4 This Regulation 18 SA Report has been prepared to assess the options (or 'reasonable alternatives') as presented in the 'WLP Issues and Preferred Options Consultation (Regulation 18) February 2024' document¹. This includes options for:
- Housing growth;
 - Gypsy and Traveller growth;
 - Employment growth;
 - Spatial strategy;
 - Policy areas; and
 - Development sites.
- E5 The assessment of reasonable alternatives is an important requirement of the SEA Regulations.

Summary findings

- E6 Findings from the assessments are presented in a single-line matrix format. The high-level matrix is not a conclusive tool or model. Its main function is to identify at a strategic level whether or not the assessment requires a more detailed examination or whether satisfactory conclusions may be drawn from the high-level assessment without the need for further (time consuming) detailed analysis of a particular policy.
- E7 As required by the SEA Regulations, cumulative, indirect and synergistic effects are also identified and evaluated during the assessment, where relevant.

¹ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

Housing growth options

- E8 Three options for housing growth have been identified by CWC, which include overall housing quanta, and broad direction of growth i.e. the proportion of the housing to be met within Wolverhampton's urban area and met through exporting through the Duty to Cooperate (DtC). In light of the government's changes to national planning policy, CWC have taken the decision to not review the Green Belt and as such distribution of growth within the Green Belt is not considered to be a reasonable alternative.
- **Option H1** – Carry forward existing housing allocations which focus housing growth in the urban area (c.9,722 homes)
 - **Option H2** – As for Option H1, with increased density in accessible locations and structural change in Centres (c.10,307 homes)
 - **Option H3** – As for Option H2, with export of remaining housing need to neighbouring authorities (c.21,720 homes)
- E9 Environmental assessment needs to have details of size, nature and location of the proposals in order for impacts to be understood in relation to the environmental baseline. The housing options have only 'nature', in this case housing. The size and location details are not present, beyond the broad direction towards the existing urban area, which means that any attempt to evaluate impacts is necessarily high level with restricted diagnostic conclusions.
- E10 A larger quantum of housing growth would generally have more potential to lead to adverse effects, particularly on environmentally focused SA Objectives. Options H1 and H2 propose significantly smaller housing numbers at 9,722 and 10,307 respectively, compared to Option H3 which proposes 21,720 homes. Development proposed under Options H1 and H2 would be located wholly within Wolverhampton's urban area. Options H1 and H2 perform similarly based on the high-level scoring system, however, as Option H1 provides a lower housing supply than Option H2, it has potential to perform slightly better against environmental SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste). Despite this, Options H1 and H2 would both lead to a significant shortfall against the identified housing need; therefore, minor negative impacts have been identified against SA Objective 11 (equality) and minor positive impacts against SA Objective 10 (housing) due to the likely reduced scope for delivering varied and high-quality homes to meet the needs of the population.
- E11 On the contrary, Option H3 recorded a major positive impact against SA Objective 10 and a minor positive impact against SA Objective 11, where the proposed development would meet the identified housing need of 21,720. However, major negative impacts were identified for Option H3 for SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste) due to the larger quantum of growth proposed under this option having potential to lead to more adverse effects than Options H1 or H2. Approximately half of the growth proposed under Option H3 (11,413 homes) will be exported to neighboring authorities, which has resulted in uncertainty in the expected impacts for the proposed housing growth since the location would be determined through other authorities' local plans.

E12 Overall, whilst Option H1 can be identified as the best performing within several SA Objectives, the three options would deliver a similar level of growth within Wolverhampton itself and as such there is very little separating the options in terms of effects within the Plan area. Options H2 and H3 both seek to deliver the same amount of increased growth in accessible locations and maximise opportunities for sustainable urban growth within Wolverhampton. In order to meet the identified housing needs, it will be necessary to export a proportion of growth to neighbouring authorities as set out in Option H3; however, this is likely to increase potential for adverse effects when compared to pursuing a lower quantum of growth.

Gypsy and Traveller growth options

E13 Two options for Gypsy and Traveller growth have been identified by CWC: Option G1 and G2. Both options include provision of 12 Gypsy and Traveller pitches at the carried forward 'Former Bushbury Reservoir, Showell Road' site, and regularising two pitches on the currently unauthorised site located on Wolverhampton Road in Heath Town. Option G2 also considers the potential to export growth through DtC.

- **Option G1** – Make use of existing sites to deliver new Gypsy and Traveller pitches up to 2032 (2 pitches regularised on currently unauthorised site and 12 pitches on existing allocated site) (14 pitches)
- **Option G2** – As for Option G1, with 19 pitches exported through DtC (33 pitches)

E14 As both proposed options for Gypsy and Traveller growth relate to the same two sites within Wolverhampton itself, Options G1 and G2 perform similarly overall. However, across several objectives the two options do perform slightly differently as Option G1 does not meet the identified Gypsy and Traveller need whereas Option G2 does, through exporting a proportion of growth to neighbouring authorities.

E15 Both options would give rise to potential adverse effects in terms of the local landscape character (SA Objective 2), biodiversity (SA Objective 3), climate change mitigation (SA Objective 5), natural resources (SA Objective 6), pollution (SA Objective 7), and waste (SA Objective 8). Negative impacts could also be expected in regard to the surface water flood risk (SA Objective 4) present on the existing allocated site, without intervention.

E16 There is some uncertainty regarding the effects of the proposed development on climate change mitigation (SA Objective 4) owing to uncertainty in the scale and nature of development involved, and in terms of equality (SA Objective 11) which is difficult to determine without further site-specific information.

E17 Overall, the proposed introduction of a total of 14 pitches under Option G1, and 33 pitches under Option G2, means that Option G2 would be likely to have a major positive impact against SA Objective 10 (housing) in comparison to Option G1 which is identified as having a minor positive impact. Option G2 would be the favourable option of the two as it would meet the identified 5-year supply of Gypsy and Traveller pitches for Wolverhampton; however, this option is reliant upon exporting 19 pitches to neighbouring authorities. The exported growth of small-scale Gypsy and Traveller pitches would be unlikely to cause

significant adverse effects, although uncertainty remains on the likely effects of exported pitches.

Employment growth options

- E18 Three options for employment growth have been identified by CWC: Option E1 – E3. These options include distributions of employment land across existing allocations taking into account the 47.4ha baseline supply figure, proposed new sites, and potential to export growth through the DtC.
- **Option E1** – Carry forward existing employment allocations on existing land supply in urban area, including completions since 2020 (c.47.4ha)
 - **Option E2** – As for Option E1, with new employment allocations in locations suitable for employment use with good transport access (c.62.7ha)
 - **Option E3** – As for Option E2, with export of remaining employment land need to neighbouring authorities (c.116ha)
- E19 As Options E1 and E2 have a similar urban focus and both fail to meet the employment land need for Wolverhampton, resulting in 47.4ha and 62.7ha of employment land respectively, the overall identified impacts against the SA Objectives are similar.
- E20 All three options would locate new development in central areas of Wolverhampton where there is generally good access via existing transport infrastructure, however Option E3 is the only option that would satisfy Wolverhampton’s identified employment need (although reliant on DtC to achieve this). As a result, a major positive impact has been identified for Option E3 under SA Objective 14 (economy), and there may be greater potential than the other options to achieve positive impacts on equality (SA Objective 11) due to the employment need being met, although the overall effect is uncertain.
- E21 On the other hand, Options E1 and E2 could potentially lead to minor negative impacts on pollution (SA Objective 7), in comparison to a major negative impact identified for Option E3, given that less development would take place in total under Options E1 and E2. However, all options would also give rise to potential adverse effects in terms of increasing threats and pressures to local biodiversity assets (SA Objective 3), including the canal network, as well as potentially locating some employment sites in proximity to areas of flood risk (SA Objective 5).
- E22 The options are unlikely to significantly affect natural resources (SA Objective 6), owing to a large proportion of development being located within existing urban areas with potential for efficient use of land including brownfield development, although there is some uncertainty in the location of exported growth under Option E3. There is unlikely to be a significant effect from any employment option on housing provision (SA Objective 10).
- E23 The effects of the proposed development under any option on climate change mitigation (SA Objective 4) and waste (SA Objective 8) are uncertain, owing to the unknown scale and nature of employment development involved. Furthermore, without knowledge of the specific site proposals and the nature of the employment land to be delivered, it is difficult to determine overall effects on landscape and townscape character (SA Objective 2) and cultural heritage (SA Objective 1) as the growth could give rise to positive or negative effects depending on these factors.

E24 Overall, whilst Option E1 would deliver the smallest quantum of employment growth and could therefore give rise to the least adverse effects against several SA Objectives, there is very little separating any of the three options in terms of growth within Wolverhampton itself. Given that Option E3 would meet Wolverhampton's employment needs within the Functional Economic Market Area (FEMA), and is likely to provide a greater range of local employment opportunities, this option could be identified as the best performing of the three; however, CWC would have little control as to the location of exported growth and there may be increased potential for adverse effects on some receptors.

Spatial options

E25 Seven options for the spatial strategy have been identified by CWC: Option A – G. These options incorporate elements of the housing and employment growth options, but provide more detail regarding options for the broad spatial distribution of growth in Wolverhampton as well as some more thematic approaches for consideration. It should be noted that none of these options alone could deliver the required growth within the Plan area.

- **Option A** – 'Business as usual'
- **Option B** – Employment-led
- **Option C** – Market-led
- **Option D** – Garden village / health promotion
- **Option E** – Minimise climate change impacts
- **Option F** - Infrastructure and regeneration-led
- **Option G** – Balanced and sustainable growth

E26 It is difficult to determine an overall best performing spatial option, as the performance of each option varies depending on the SA Objective in question. Generally, options which perform better against meeting development needs would also put the most pressure on environmental resources and social facilities.

E27 Options A and B performed joint best against SA Objectives 3 (biodiversity), 5 (climate change adaptation) and 6 (natural resources) due to the protection of previously undeveloped land. Option B also performed best against SA Objective 13 (economy) as it proposes an employment-led strategy.

E28 Option D performed best against SA Objectives 7 (pollution) and 12 (health) owing to the focus on 'Garden Village' principles including the protection of existing open spaces and integration of new open spaces within new developments.

E29 Option E performed best against SA Objectives 4 (climate change mitigation), 9 (transport and accessibility) and 14 (education), as this option would direct new development towards areas with the best sustainable transport access.

E30 Option F performed best against SA Objectives 1 (cultural heritage) and 2 (landscape) due to its focus on urban regeneration, and SA Objective 8 (waste) due to its emphasis on concentrating development where infrastructure provision is best.

E31 Option G performed best against SA Objectives 10 (housing) and 11 (equality), because the balanced approach would meet identified housing and employment needs, and aims

to direct new development towards accessible areas, whilst also supporting urban regeneration.

E32 The worst performing option could be identified as Option C, as the option was not identified to perform best against any SA Objectives.

E33 Overall, Option B performs the best (or joint best) against the most SA Objectives; however, this strategy would lead to a housing shortfall. Option G is the only option that would satisfy both the identified housing and employment needs, whilst also attempting to strike a balance between retaining valuable environmental assets and prioritising development in more accessible locations which facilitate sustainable transport.

Policy areas

E34 The WLP Issues and Preferred Options Consultation document presents a suite of 56 proposed policy areas for inclusion in the emerging WLP, many of which are derived from the ceased Black Country Plan (BCP).

E35 The proposed policies to be included within the WLP are anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the WLP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes.

E36 For the majority of policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the more 'thematic' policies.

E37 A greater range of potential sustainability effects are identified for policies that have potential to introduce new development such as the housing and economy policies, or set out the broad direction for growth, such as the spatial strategy policies. As such, minor negative or uncertain impacts have been identified for some SA Objectives as a result of policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, or introduction of new development into areas where there may be sensitive receptors.

E38 Opportunities for enhancement may also be secured through policies in the WLP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in the SA process (see recommendations in **Chapter 10**).

Development sites

E39 A total of 48 sites have been identified by CWC as reasonable alternatives to be assessed as part of the SA, informed by the Call for Sites process and other studies undertaken as part of the evidence base for the WLP, and previously for the ceased BCP. This includes 'carried forward' housing and employment sites, which have previously been previously allocated in the adopted Development Plans. The 48 reasonable alternative sites include:

- 22 sites proposed for residential use;

- 25 sites proposed for employment use; and
- One site proposed for Gypsy and Traveller use.

E40 The SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA framework, based on the methodology and baseline information as discussed within **Chapter 2** and **3** of this report. The assessment of the 48 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in **Appendix C**.

E41 Positive impacts were identified for many of the reasonable alternative sites in terms of access to social infrastructure, due to their location in areas where accessibility modelling data indicates good sustainable access to local shops, healthcare, schools, transport and employment opportunities. Identified positive impacts also included the impact of reasonable alternative sites on the provision of housing and employment floorspace, contributing to the identified needs. The majority of reasonable alternative sites are located in Flood Zone 1 away from fluvial flood risk, and many sites comprise previously developed land leading to positive effects in terms of encouraging an efficient use of natural resources.

E42 Identified negative impacts included the potential for small-scale loss of soil resources at some sites, impacts on local biodiversity designations, changes to local views, possible alteration of the character or setting of cultural heritage assets, and increased pollution and waste associated with large scale development. The entirety of Wolverhampton is designated as an AQMA, and several sites are located in close proximity to main roads, and as such the proposed development could potentially expose site end users to higher levels of transport-associated air pollution. Identified negative impacts also included the location of reasonable alternative sites in regard to surface water flood risk, where a large proportion of sites are located on areas of vulnerable to surface water flooding.

Next steps

E43 This Regulation 18 Issues and Preferred Options SA Report will be subject to consultation with statutory consultees, stakeholders and the general public.

E44 This report represents the latest stage of the SA process. Any comments received on this report during the Regulation 18 consultation will be considered and used to inform subsequent stages of the SA process, where appropriate.

E45 Once CWC have reviewed Regulation 18 consultation comments and have begun preparing the next version of the WLP (Regulation 19 stage), preparation of an Environmental Report will be, also known as a full SA report. The Environmental Report will include all of the legal requirements set out in Schedule 2 of the SEA Regulations.

1 Introduction

1.1 Background

- 1.1.1 The City of Wolverhampton Council (CWC) are in the process of writing the Wolverhampton Local Plan (WLP). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA). The purpose of SA/SEA is to help guide and influence the decision making process for CWC by identifying the likely sustainability effects of reasonable alternatives and various options.
- 1.1.2 The purpose of this SA report is to assess the sustainable development implications of proposals presented in the Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18)² document.
- 1.1.3 A wide range of reasonable alternatives have been identified by CWC through the plan making phase known as 'Issues and Preferred Options'. This includes growth options, spatial options, policy areas and sites. The SA outputs will help CWC to identify sustainable development options and prepare a local plan which is economically, environmentally, and socially sustainable.
- 1.1.4 A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.1.5 This SA/SEA document follows on from the SA Scoping Report prepared in November 2022³, which was consulted on with the statutory bodies (Natural England, Historic England and the Environment Agency) between November and December 2022.

1.2 The City of Wolverhampton

- 1.2.1 The Wolverhampton City administrative area comprises roughly 6,943.6ha, with a population of approximately 264,036 people according to the Office for National Statistics (ONS) population estimate for mid-2021⁴. **Figure 1.1** shows the administrative boundary of Wolverhampton, which comprises the Plan area for the WLP.

² City of Wolverhampton Council (2023) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

³ Lepus Consulting (2022) Sustainability Appraisal of the Wolverhampton Local Plan: Scoping Report, November 2022.

⁴ ONS (2022) Estimates of the population for the UK. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021unroundeddata> [Date accessed: 10/01/24]

- 1.2.2 Wolverhampton City lies within the Black Country, which is a predominantly urban sub-region of the West Midlands. The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton.
- 1.2.3 Wolverhampton is highly urbanised with some small extents of Green Belt land mainly to the north and west, and alongside the Smestow Brook and the Staffordshire and Worcestershire Canal. Although the city contains no major rivers, it does support several watercourses including the River Penk and River Tame which form tributaries of the River Trent, as well as Smestow Brook which is a tributary of the River Stour.
- 1.2.4 Wolverhampton City Centre is the key strategic centre of Wolverhampton, although the administrative area also contains two town centres of Bilston and Wednesfield, in addition to several local centres.
- 1.2.5 The area has a rich industrial heritage, including its extensive canal network, which opened up the mineral wealth of the area for exploitation during the Industrial Revolution. The Black Country area owes its name to black smoke, particularly from iron and coal industries, during a time when the Black Country became one of the most heavily industrialised areas in Britain.
- 1.2.6 Mining ceased in the area in the late 1960s, but manufacturing continues today, although on a much smaller scale. There is a total of 446,000 employee jobs across the Black Country as a whole⁵. In addition to manufacturing, which equate to approximately 13% of employee jobs in the Black Country, the biggest employment sectors include wholesale and retail trade (19.3%) and human health and social work activities (16.4%)⁶.
- 1.2.7 Wolverhampton itself was originally a market town, historically forming part of Staffordshire, but later became a major centre for the Industrial Revolution⁷. Today, Wolverhampton still provides a wide range of employment, leisure, retail and tourism opportunities to serve the Black Country and the wider area. Engineering remains an important aspect of Wolverhampton's economy.
- 1.2.8 Although there are challenges within Wolverhampton, and the wider Black Country, in terms of unemployment and lower earnings compared to other parts of the country, the plan area also supports several further and higher educational facilities. This includes the University of Wolverhampton and the City of Wolverhampton College.

⁵ Nomis (2020) Labour Market Profile – Black Country. Available at:
<https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date accessed: 31/10/22]

⁶ Ibid

⁷ Wolverhampton City Guide. Available at: <http://www.wolverhamptoncity.co.uk/> [Date accessed: 06/12/23]

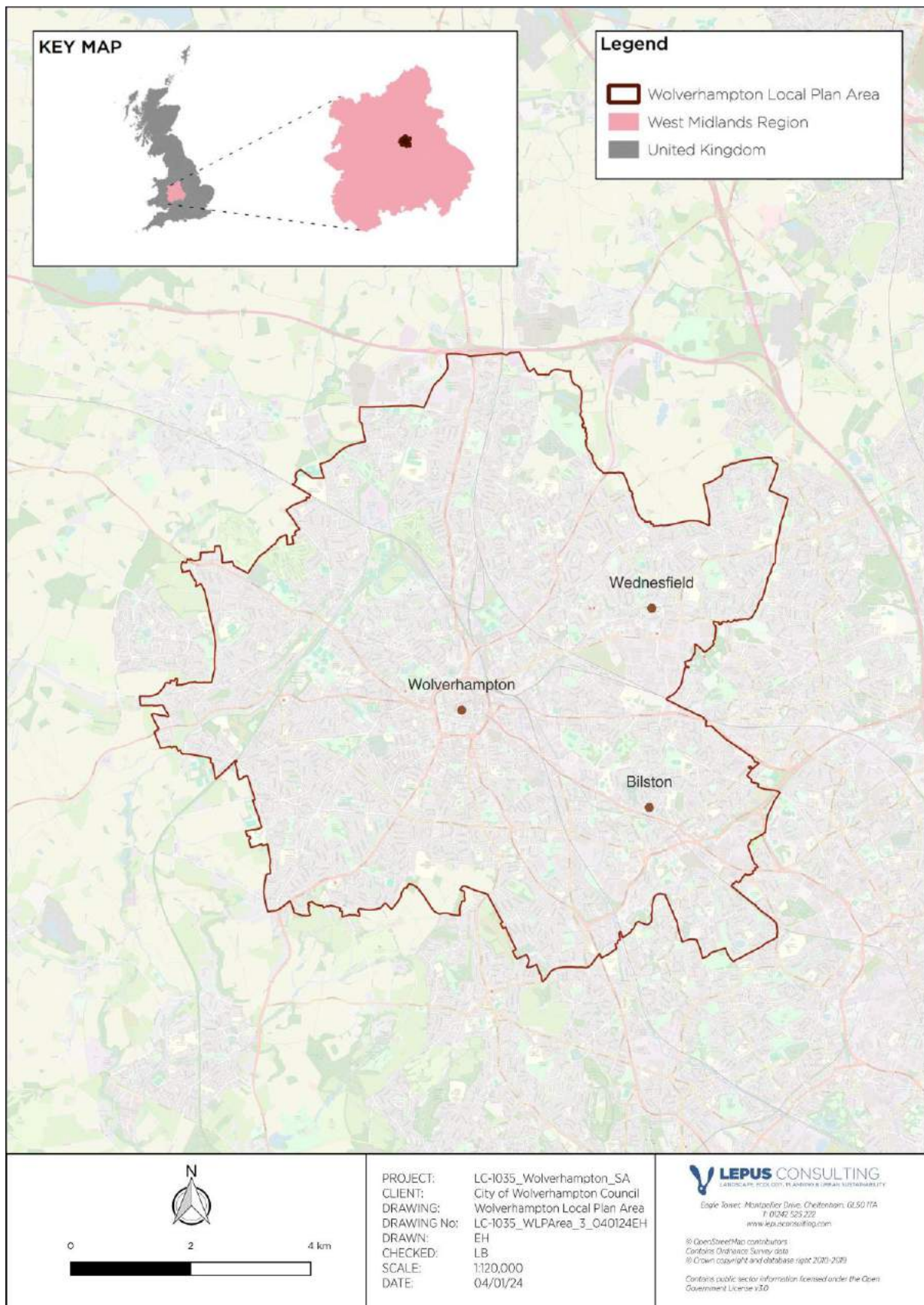


Figure 1.1: Wolverhampton administrative boundary

1.3 The Wolverhampton Local Plan

- 1.3.1 The Wolverhampton Local Plan (WLP) is being prepared by CWC, following the ending of work on the Black Country Plan (BCP) in autumn 2022. The WLP will carry forward relevant information and evidence prepared as part of the Draft BCP, with specific changes in response to planning issues raised during consultation and new evidence and information for the City of Wolverhampton.
- 1.3.2 The BCP itself began as a review of the adopted Black Country Core Strategy (BCCS), produced by the four Black Country Authorities of Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council.
- 1.3.3 The BCCS was adopted in 2011 and covers the period up to 2026. The BCCS currently provides the strategic framework for the three Area Action Plans (AAPs) in Wolverhampton, which set out local policies and site allocations for the parts of Wolverhampton where regeneration and growth is concentrated.
- 1.3.4 The purpose of the BCP was to review and update the adopted BCCS, and to set out planning policies and land allocations to support the growth and regeneration of the Black Country up to 2039.
- 1.3.5 Following the decision to end work on the BCP, in October 2022, Wolverhampton adopted a new Local Development Scheme (LDS) setting out the timetable for the immediate preparation of a new development plan for Wolverhampton called the Wolverhampton Local Plan (WLP). The WLP is an evolution of the Regulation 18 Draft Black Country Plan (2021), specific to Wolverhampton. Work on the WLP was paused when the government consulted on changes to the National Planning Policy Framework (NPPF) in December 2022. Following publication of a revised NPPF⁸ in December 2023, a new LDS has been produced which programmes Issues and Preferred Options consultation for spring 2024 and submission by June 2025, under the current local planning system. The LDS also anticipates production of a Wolverhampton City Centre Supplementary Plan AAP under the new local plan system, to provide any additional housing allocations required for the City Centre area.
- 1.3.6 The WLP will provide a vision, strategic goals and priorities for land use and development within Wolverhampton, as well as a spatial policy framework to define guidelines for growth and change whilst striving to protect the environment.
- 1.3.7 Once adopted, the WLP will provide a strategy for delivering development across the Plan area, and allocation of sites to help meet these needs. The WLP will provide certainty and transparency to residents, businesses and developers about how Wolverhampton City is expected to grow up to 2042.

⁸ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/23]

1.4 Duty to Cooperate

- 1.4.1 The Duty to Cooperate (DtC) was created in the Localism Act 2011⁹ and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 1.4.2 A DtC Statement will be prepared, which will demonstrate how CWC has fulfilled this duty through the plan-making process. It is intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key DtC issues at the Publication stage.

1.5 Integrated approach to SA and SEA

- 1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.5.2 The European Union Directive 2001/42/EC¹⁰ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.
- 1.5.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004¹¹ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Local Plan to be subject to SEA throughout its preparation.

⁹ Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 01/12/23]

¹⁰ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 01/12/23]

¹¹ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 01/12/23]

1.5.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004¹² and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012¹³. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

1.5.5 Public consultation is an important aspect of the integrated SA/SEA process.

1.6 Health impact assessment

1.6.1 Government guidance states that health is influenced by numerous social, economic, environmental and cultural impacts¹⁴. Therefore, potential direct impacts from developments could be key contributors to negative health impacts. For example, transport developments cause issues with traffic accidents, noise and air pollution. Health Impact Assessments (HIAs) help decision-makers quantify the health risks or benefits associated with a development and propose likely alternatives.

1.6.2 HIAs are not statutory requirements for Local Plans. However, carrying out this assessment helps to ensure the WLP considers all health issues and construct new policies with the aim of increasing positive health impacts and reducing negative impacts.

1.6.3 It should be noted that human health is a topic which features in Schedule 2 of the SEA Regulations: Information for environmental reports. The HIA has been incorporated within SA Objective 12: Health (see **Appendix A** for the full SA Framework).

1.7 Equality impact assessment

1.7.1 The aim of the Equality Act (2010)¹⁵ is to strengthen current laws that prevent discrimination. The act applies to the provision of services and public functions and thus includes the development of local authority policies and plans. Equality Impact Assessment (EqIA) aims to improve the work of councils and ensure plans do not discriminate in the way they provide services and employment and do all they can to promote equality.

¹² Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 01/12/23]

¹³ The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date accessed: 01/12/23]

¹⁴ Department of Health (2010) Health Impact Assessment Tools. Available at: <https://www.gov.uk/government/publications/health-impact-assessment-tools> [Date accessed: 01/12/23]

¹⁵ Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 01/12/23]

- 1.7.2 EqIA is a systematic and evidence-based tool, which enables the WLP to consider the likely impact of work on different groups of people who share a protected characteristic¹⁶, identified in the Equality Act. Completion of EqIAs is a legal requirement under race, disability and gender equality legislation.
- 1.7.3 The EqIA has been incorporated within SA Objective 11: Equality (see **Appendix A** for the full SA Framework).

1.8 Best practice guidance

1.8.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Regulations. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment¹⁷.
- Office of the Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹⁸.
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)¹⁹.
- DLUHC and Ministry of Housing, Communities and Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)²⁰.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans²¹.

¹⁶ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

¹⁷ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 01/12/23]

¹⁸ Office of the Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf [Date accessed: 01/12/23]

¹⁹ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/24]

²⁰ DLUHC & MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 01/12/23]

²¹ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 01/12/23]

1.9 Sustainability appraisal

1.9.1 This document is a component of the SA of the WLP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to PPG on SA²².



Figure 1.2: Sustainability appraisal process

²² DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 01/12/23]

1.10 The SA process so far

1.10.1 **Table 1.1** below presents a timeline of stages of the WLP and SA process so far. To date, this represents Stages A and B of **Figure 1.2**. The Council have gathered information in relation to site availability through numerous 'Call for Sites' processes.

Table 1.1: The WLP and Sustainability process so far

Date	WLP stage	Sustainability Appraisal
November 2022	Plan making commences.	SA Scoping Report This report identifies the scope and level of detail to be included in the SA.
February–April 2024	Issues and Preferred Options (Regulation 18) Consultation The Issues and Preferred Options is the first consultation stage for plan making. It sets out options for the overall levels of growth and spatial strategy as well as site allocations and policy areas, and seeks consultation views on these to help inform the WLP process going forward.	Regulation 18: Issues and Preferred Options SA Report This report assesses the WLP options for housing growth, employment growth, Gypsy and Traveller growth, spatial strategy, development sites and policy areas.

1.11 Scoping report

1.11.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report²³ was produced in November 2022.

1.11.2 The SA scoping report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.11.3 The Scoping report was consulted on between November and December 2022 with the statutory bodies Natural England, Historic England and the Environment Agency. Comments received during the consultation have informed the preparation of this Regulation 18 SA Report. **Table 1.2** summarises the responses received and how these comments have been incorporated into the SA process going forward.

²³ Lepus Consulting (2022) Sustainability Appraisal of the Wolverhampton Local Plan: Scoping Report, November 2022.

Table 1.2: Consultation responses from statutory consultees on SA Scoping Report (November 2022)

Consultee	Summary of Consultation Response	Incorporation into the SA
Natural England	No comments received at this stage, but NE officer indicated that NE expect to input at a later stage of the plan making process.	N/A
Historic England	<p><i>"Chapter 6: Cultural Heritage Baseline Data – We are pleased to see that this baseline presents a comprehensive background into the designated and non-designated heritage assets of the Plan area, and also refers to heritage at risk, although not in any detail.</i></p> <p><i>Key Issues – We consider that although some relevant key sustainability issues in relation to the historic environment have been identified, we suggest that heritage at risk may also be an issue which should be included, as this has been identified elsewhere within the document. Historic England also considers that other sustainability issues should be included here, such as improving the energy efficiency of historic buildings and taking into account their embodied carbon value when considering the retention and re-use, versus their replacement.</i></p> <p><i>Chapter 12: SA Framework Historic England welcomes SA Objective 1: "Cultural Heritage" and also objectives 2: Landscape, and 4 & 5 on Climate Change. However, we note that the report does not set out any appraisal questions or decision-making criteria under these objectives. In relation to the historic environment/cultural heritage we suggest that these decision-making criteria should reflect all of the Key Issues identified under this theme, as well as wider sustainability issues regarding the historic environment, such as:</i></p> <ul style="list-style-type: none"> <i>• "Will it tackle heritage at risk?"</i> <i>• "Will it improve the energy efficiency of historic buildings?"</i> <i>• "Will it re-use/retain historic buildings or fabric?"</i> <p><i>In addition to the above comments, Historic England is concerned that it is not clear from the document as to how impacts will be evaluated, as there is no framework, or mechanism, for assessment included. The document does not therefore set out how policies or site allocations will be assessed or provide detailed information about how potential significant effects will be identified (both positive and negative); for example, using professional judgement and reference to evidence base documents. We strongly recommend that this is included within a revised SA Scoping document."</i></p>	<p>The key issues referred to within the cultural heritage section have been updated to reflect the suggestions made (see Box 2.5).</p> <p>The full SA Framework is set out in Appendix B of the SA Scoping Report (November 2022), and has been updated within Appendix A of this Regulation 18 SA Report.</p> <p>Chapter 3 sets out the methodology used to appraise the options and proposals included within the Issues and Preferred Options (Regulation 18) Consultation.</p>
Environment Agency	No comments received at this stage.	N/A

1.12 Signposting for this report

1.12.1 This Regulation 18 Issues and Preferred Options SA Report sets out an assessment of reasonable alternatives, or 'options', set out in the Issues and Preferred Options document prepared by CWC. These relate to options for growth and the spatial strategy, policy areas and development sites.

1.12.2 The appendices of this report provide essential contextual information to the main body of the report. The contents of this SA Report are listed below:

- **Chapter 1** (this chapter) sets out the purpose, context and introduction to the WLP and the accompanying SA process.
- **Chapter 2** summarises information relating to the environmental baseline, which was identified and set out in full in the SA Scoping Report (2022).
- **Chapter 3** sets out the methodology used to present and assess the findings of the SA process.
- **Chapter 4** presents the assessment of the housing growth options.
- **Chapter 5** presents the assessment of the Gypsy and Traveller growth options.
- **Chapter 6** presents the assessment of the employment growth options.
- **Chapter 7** presents the assessment of the spatial strategy options.
- **Chapter 8** summarises the SA findings in relation to the assessment of proposed policy areas for the WLP.
- **Chapter 9** summarises the SA findings in relation to the assessment of reasonable alternative development sites, and presents selection and rejection information.
- **Chapter 10** sets out the conclusions of this Regulation 18 SA, and outlines the next steps.
- **Appendix A** presents the SA Framework.
- **Appendix B** presents the assessment of the proposed policy areas for the WLP.
- **Appendix C** sets out the assessment of the reasonable alternative development sites, presented by receptor within each SA Objective.

2 Environmental baseline

2.1 Overview

2.1.1 This chapter summarises key baseline information relating to each SEA topic and sets out how these are considered within the SA Framework, against which all options have been assessed. Please refer to the SA Scoping Report²⁴ for the full environmental baseline.

2.2 Accessibility and transport

2.2.1 The city centre is the key strategic centre of Wolverhampton, with two town centres (Bilston and Wednesfield) and numerous local centres. The density of the urban area and the number of centres create particularly complex movement patterns and have led to a complicated transport network.

2.2.2 There is good access to the rail network and bus links within the city. The rail network in the wider Black Country area includes four passenger rail lines and the Midland Metro light rail system that operates between Birmingham and Wolverhampton. This service takes approximately 40 minutes from Wolverhampton St Georges to Birmingham Grand Central.

2.2.3 Within the WLP area, there are a few but fragmented PRoW including paths along the canal system. The City of Wolverhampton has a generally well-connected network of cycle routes. Ongoing development and upgrades to the cycling and walking network seek to connect communities and promote active travel as a healthy and sustainable mode of transport.

2.2.4 The transport theme is relevant to a variety of other sustainability themes. For example, improving sustainable transport accessibility and usage would be likely to lead to a reduction in greenhouse gas (GHG) emissions, which would contribute towards climate change mitigation efforts. If residents are encouraged to cycle or walk, they will be likely to realise health benefits. A reduction in congestion would also be likely to provide an economic boost to the local area, whilst improved air quality would benefit human health, as well as habitats or wildlife sites which are sensitive to air pollutants such as atmospheric nitrogen.

2.2.5 In the SA process, accessibility and transport is considered primarily under SA Objective 9: Transport and Accessibility, although there is some degree of overlap with other SA Objectives such as SA Objective 4: Climate Change Mitigation (see **Appendix A**).

²⁴ Lepus Consulting (2022) Sustainability Appraisal of the Wolverhampton Local Plan: Scoping Report, November 2022.

Box 2.1: *Key issues regarding accessibility and transport identified during Scoping*

- ⇒ The City of Wolverhampton is well serviced by a range of transport modes.
- ⇒ Growth in travel and car use is likely to increase pressure on the road network within the WLP. Road junctions, especially along the motorway network, suffer with congestion issues.
- ⇒ Reliance on personal car use is high.
- ⇒ New development in Wolverhampton and the wider Black Country has the potential to impact on the transport infrastructure.
- ⇒ There is a limited number of Public Rights of Way (PRoW) within the WLP area.

2.3 Air quality

- 2.3.1 There is one designated AQMA covering the entire WLP area; 'Wolverhampton AQMA'. This AQMA was declared in 2005, due to exceedances in the national annual mean objectives for NO₂ and PM₁₀²⁵. The principal pollutant affecting air quality in Wolverhampton is nitrogen dioxide (NO₂), mostly sourced from road traffic²⁶. The adjacent authorities of Dudley, Walsall and Sandwell are also wholly designated as AQMAs.
- 2.3.2 As all proposed development in Wolverhampton will be located within an AQMA, this is likely to lead to adverse impacts on health and may reduce the likelihood of the Council achieving air quality targets. It is assumed that new development proposals within the Black Country would also result in an increase in traffic and thus could potentially increase traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.
- 2.3.3 It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*²⁷. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{28 29}. Exposure to road transport associated emissions may have long term health impacts. Air pollution, particularly excessive nitrogen deposition, is known to be harmful to the health and functioning of natural habitats.
- 2.3.4 In the SA process, air quality is considered primarily under SA Objective 7: Pollution (see **Appendix A**).

Box 2.2: Key issues regarding air quality identified during Scoping

- ⇒ Wolverhampton AQMA covers the whole local authority area and the principal pollutant affecting air quality is nitrogen dioxide (NO₂), mostly sourced from road traffic.
- ⇒ New housing, employment development areas, commercial and domestic sources, transport, and increasing visitor numbers in the area have the potential to lead to adverse impacts on air quality.
- ⇒ Atmospheric pollutants are expected to increase as a result of increasing traffic congestion issues.

²⁵ DEFRA UK Air Information Resource: Wolverhampton City Council. Available at: https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=319 [Date accessed: 29/11/22]

²⁶ Department for Energy Security & Net Zero (2023). UK local authority greenhouse gas emissions estimates 2021. Available at: <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf> [Date accessed: 06/12/23]

²⁷ Department for Transport (2023) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 29/11/23]

²⁸ Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

²⁹ Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

2.4 Biodiversity, flora, fauna and geodiversity

Habitats sites

- 2.4.1 Habitats sites (previously referred to as European sites) provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive, and Special Protection Areas (SPAs) classified under the Birds Directive. Additionally, paragraph 187 of the NPPF requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated Habitats sites.
- 2.4.2 There are two Habitats sites located in proximity to the Plan area; 'Fens Pools' SAC and 'Cannock Extension Canal' SAC. Threats and pressures which could potentially be exacerbated by the development set out in the WLP could include habitat fragmentation and water pollution³⁰. Some threats and pressures to Cannock Extension Canal SAC include water pollution and air pollution³¹. No Zones of Influence (ZOIs) have been identified for these sites at the time of writing.
- 2.4.3 'Cannock Chase' SAC lies some 11.5km to the north east of Wolverhampton, at its closest point. The identified threats and pressures to the qualifying features of Cannock Chase SAC include air pollution (atmospheric nitrogen deposition), hydrological changes, wildfire/arson and public access and disturbance³². A 15km ZOI for Cannock Chase SAC has been identified through analysis of visitor survey data³³, a proportion of which falls within Wolverhampton.
- 2.4.4 A Habitats Regulations Assessment (HRA) is being prepared alongside the development of the WLP to provide an in-depth assessment of the potential threats and pressures to a number of Habitats sites and analysis of potential impact pathways. The outputs of the HRA process will help to inform the SA.

National designations

- 2.4.5 There are no Sites of Special Scientific Interest (SSSIs) within Wolverhampton itself, although some areas in the north of Wolverhampton lie within SSSI Impact Risk Zones (IRZs) which state that "*Strategic solutions for recreational impacts are in place. Please contact your Local Planning Authority as they have the information to advise on specific requirements*".

³⁰ Natural England (2014) Site Improvement Plan: Fens Pools. Available at:
<http://publications.naturalengland.org.uk/file/4872756676001792> [Date accessed: 29/11/23]

³¹ Natural England (2014) Site Improvement Plan: Cannock Extension Canal. Available at:
<http://publications.naturalengland.org.uk/file/6749431462363136> [Date accessed: 29/11/23]

³² Natural England (2014) Site Improvement Plan: Cannock Chase. Available at:
<http://publications.naturalengland.org.uk/publication/4957799888977920> [Date accessed: 29/11/23]

³³ Underhill-Day, J. & Liley, D. (2012) Cannock Chase Visitor Impacts Mitigation Report. Footprint Ecology. Unpublished Report.

- 2.4.6 There are no National Nature Reserves (NNRs) located within the WLP area, the nearest being 'Wren's Nest' NNR approximately 1.5km to the south, in Dudley.

Local designations

- 2.4.7 The WLP area contains an important network of local designations running through the urban area, including Local Nature Reserves (LNR), Sites of Importance for Nature Conservation (SINC) and Sites of Local Importance for Nature Conservation (SLINC) for their geological importance. These also form important wildlife corridors, allowing species to move between habitats.
- 2.4.8 Revised SINC and SLINC boundaries have been confirmed by the Local Sites Partnership, including a proposed new SINC at 'Alexander Metals Open Space', a proposed new SLINC at 'Bushbury Pastures', and an amended boundary for 'Land East of Dale Street / Land South of Citadel Junction' SLINC. The emerging Wyrley & Essington Canal LNR has been approved by the Cabinet on 14th June 2017 but is awaiting formal approval by Natural England.
- 2.4.9 There are 15 Regionally Important Geodiversity Sites (RIGS) within the West Midlands area, but none within the City of Wolverhampton.

Habitats and green infrastructure

- 2.4.10 Priority habitats present in Wolverhampton include: good quality semi-improved grassland; deciduous woodland; coastal and floodplain grazing marsh; traditional orchard (small extents); and lowland meadows (small extents).
- 2.4.11 Ancient woodland is defined as an area that has been wooded continuously since at least 1600AD and includes 'ancient semi-natural woodland' and 'plantations on ancient woodland sites', both of which have equal protection under the NPPF. There are some small areas of ancient woodland located within Wolverhampton.
- 2.4.12 Green Infrastructure (GI) can be described as a network of multi-functional assets including natural and semi-natural features which can contribute to a range of ecosystem services, including biodiversity conservation and resilience. Much of Wolverhampton is heavily urbanised, with a lack of mature trees within the centres. Lack of GI results in a reduced capability of the environment to provide ecosystem services.

Nature Recovery Network

- 2.4.13 A Nature Recovery Network is a joined-up system of places important for wildlife to be able to move from place to place and enables the natural world to adapt to change³⁴. It is a major commitment in the government's 25 Year Environment Plan³⁵ to expand, improve and better connect wildlife rich places. A critical tool in the success of Nature Recovery Networks are Nature Recovery Maps. The map ensures that development and infrastructure is permitted in the right places and has a positive impact on the network, and ensures key wildlife sites are strongly protected for future restoration.
- 2.4.14 A draft Black Country Local Nature Recovery Opportunity Map (**Figure 2.1**) has been produced by the Wildlife Trust for Birmingham and the Black Country and the Local Environmental Records Centre (EcoRecord)³⁶ through analysis of local and national data sets including designated sites, priority habitats, species distribution, land use and ecological connectivity. This drew on the Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy³⁷ which identified the conurbation's Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas through a detailed review of data and evidence collected over 17 years.
- 2.4.15 The Nature Recovery Opportunity Map (**Figure 2.1**) comprises a number of components that depict the areas of current high ecological value, ecological connectivity between these areas, and prioritises opportunities for investment in nature recovery on a landscape scale. Key ecological sub-areas within Wolverhampton include 'Smestow Valley and Tettenhall Ridge'³⁸, 'Moseley Hall and Northcote Farm'³⁹, and 'Limestone Way and Sedgley Park'⁴⁰.

³⁴ Wildlife Trust (2018). A Wilder Britain. Creating a Nature Recovery Network to bring back wildlife to every neighbourhood. Available at: https://www.wildlifetrusts.org/sites/default/files/2018-06/Nature_recovery_network_final.pdf [Date accessed: 06/12/23]

³⁵ DEFRA (2018) 25 Year Environment Plan. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan> [Date accessed: 06/12/23]

³⁶ Birmingham & Black Country Wildlife Trust (2022). Black Country Local Nature Recovery map and strategy: an emergin approach. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/Black-Country-Local-Nature-Recovery-map-and-strategy-%20an-emerging-approach.pdf> [Date accessed: 06/12/23]

³⁷ Birmingham & Black Country Wildlife Trust (2017) Technical Report of the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017 – 2022.

³⁸ Birmingham & Black Country Wildlife Trust (2022). Ecological Sub-area Statement of Biodiversity Priorities – Technical Appendix. Smestow Valley and Tettenhall Ridge. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/Smestow-Valley-%26-Tettenhall-Ridge.pdf> [Date accessed: 06/12/23]

³⁹ Birmingham & Black Country Wildlife Trust (2022). Ecological Sub-area Statement of Biodiversity Priorities – Technical Appendix. Moseley Hall and Northcote Farm. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/Moseley-Hall-%26-Northcote-Farm.pdf> [Date accessed: 06/12/23]

⁴⁰ Birmingham & Black Country Wildlife Trust (2022). Ecological Sub-area Statement of Biodiversity Priorities – Technical Appendix. The Limestone Way and Sedgley Park. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/The-Limestone-Way-%26-Sedgley-Park.pdf> [Date accessed: 06/12/23]

2.4.16 To produce the draft Nature Recovery Opportunity Map, the Core Landscapes and Priority Network Restoration Zones were overlain on the components of the Nature Recovery Network Map. Locations where the Core Landscapes directly link with the Natural England’s National Habitat Network in adjoining local authority areas are indicated as National Habitat Network Connections.

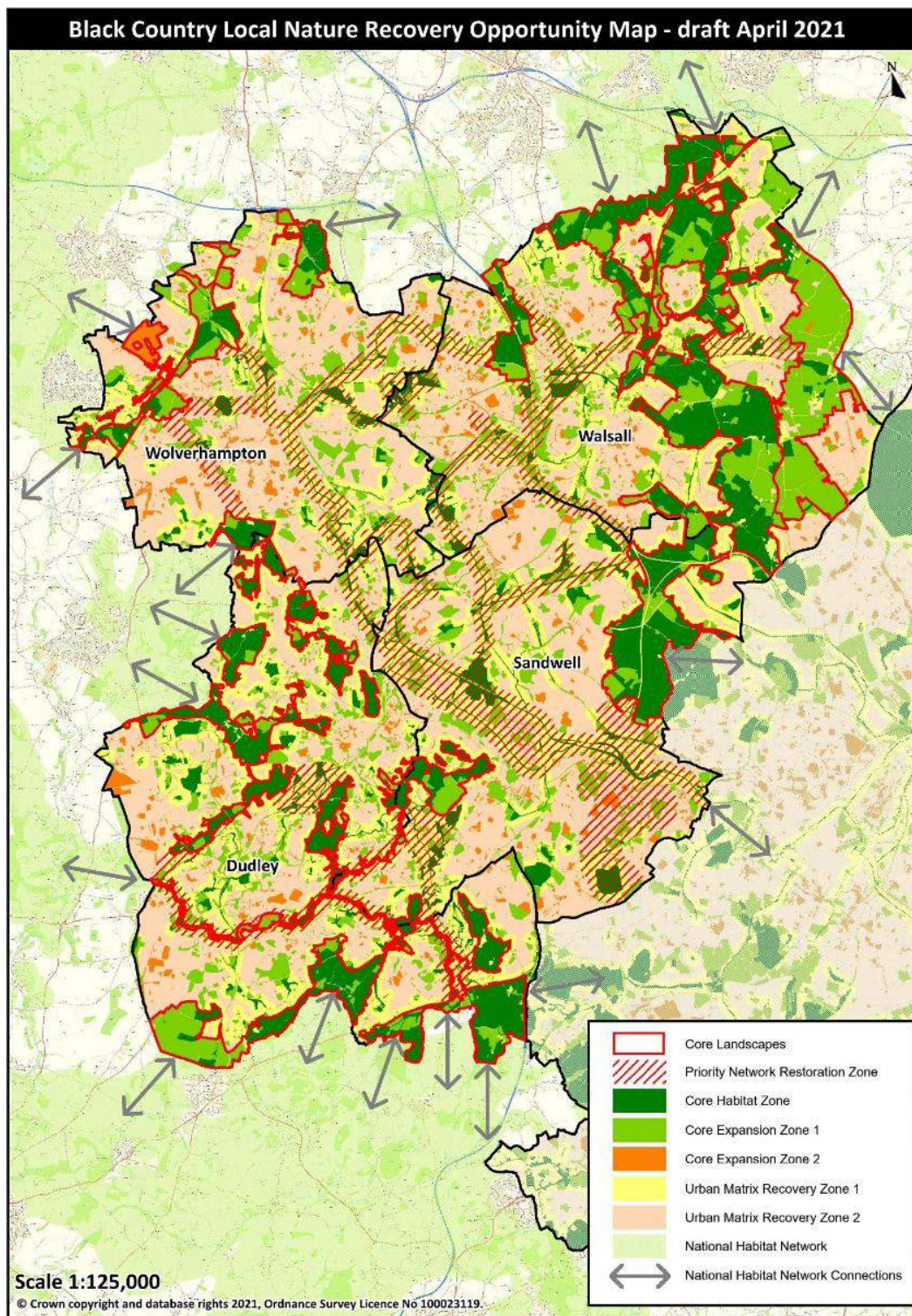


Figure 2.1: Draft Black Country Local Nature Recovery Opportunity Map

2.4.17 In the SA process, biodiversity, flora, fauna and geodiversity are considered primarily under SA Objective 3: Biodiversity, flora, fauna and geodiversity (see **Appendix A**).

Box 2.3: *Key issues regarding biodiversity, flora, fauna and geodiversity identified during Scoping*

- ⇒ There are a few BAP habitats and species present within the Local Plan area, which should continue to be managed and conserved appropriately.
- ⇒ Enhancements to the Core Strategy area's GI network will support local and sub-regional biodiversity networks through helping to improve connectivity for habitats and species.
- ⇒ Growth within the WLP area is likely to put pressure on biodiversity. There are potential impacts from habitat fragmentation resulting from new development areas and recreational pressures on wildlife sites.
- ⇒ Geodiversity is a key contributor to the WLP's natural environment and may be affected by noise or light pollution.

2.5 Climatic factors

Carbon emissions

2.5.1 As of 2021, the City of Wolverhampton’s per capita carbon dioxide (CO₂) emissions are lower than the West Midlands and the national average (see **Table 2.1**). The UK local authority dataset⁴¹ indicates a general trend of reduced emissions over time.

Table 2.1: Estimated CO₂ emissions in 2021⁴²

	Total CO ₂ emissions estimates (kt CO ₂)	Per Capita CO ₂ emissions (t CO ₂)
Wolverhampton	895.6	3.4
West Midlands	28,114.3	4.7
National Total	323,462.4	4.8

2.5.2 Major sources of CO₂ emissions in Wolverhampton are from transport and domestic sources (see **Table 2.2**). It is likely that residential development proposed within the Plan area would result in an increase in domestic CO₂ (and other GHG) emissions, and also an increase in the number of vehicles on the road in the Plan area with a consequent increase in transport-related GHG emissions, contributing to the ‘greenhouse effect’ and exacerbating anthropogenic climate change.

Table 2.2: Per capita carbon dioxide emissions by sector: regional summary 2021 (kt CO₂)⁴³

Region/ Country	Industrial	Commercial	Public Sector	Domestic	Transport	Total
Wolverhampton	175.8	61.0	64.7	348.2	242.0	895.6
West Midlands	6,576.7	1,251.0	1297.0	8,012.1	10,861.6	28,114.3

2.5.3 The layout and design of future development can have benefits to achieving sustainable development and reducing contributions to climate change. The WLP could potentially help to encourage the development of more energy efficient homes to help reduce the overall carbon emissions of Wolverhampton. Energy efficient homes can include Eco Houses, Zero Carbon Homes and Passivhaus⁴⁴.

2.5.4 The promotion of on-site renewable or low carbon technologies incorporated with new development in the WLP would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels.

⁴¹ Department for Energy Security and Net Zero (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2021. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 29/11/23]

⁴² Ibid

⁴³ Ibid

⁴⁴ Urbanist Architecture. How to design Eco, Passivhaus and Zero Carbon Homes. Available at: <https://urbanistarchitecture.co.uk/how-to-design-eco-houses-passivhaus-and-zero-carbon-houses/> [Date accessed: 01/11/22]

Flooding

- 2.5.5 Climate change is anticipated to increase the risk of extreme weather events, leading to rising risk of flooding. Surface water flooding in urban areas may increase in particular in light of more torrential and frequent rainfall events, especially during winter. Extents of low, medium and high surface water flood risk are present across the WLP area.
- 2.5.6 A network of waterways course through the WLP area. Associated with these waterways are differing extents of fluvial flood risk. The significant majority of the WLP area is within Flood Zone 1, where fluvial flood risk is low; however, there are some extents of Flood Zone 2 and 3 located to the north, south west and south east of Wolverhampton.
- 2.5.7 A Level 1 Strategic Flood Risk Assessment (SFRA)⁴⁵ identified flood risk across the Black Country, including Wolverhampton, from all sources in the present and in the future. The assessment has identified potential increases in flood risk due to climate change and produced modelled outputs. Indicative Flood Zone 3b identified in this study can be found in the northern and south eastern edges of the WLP area.
- 2.5.8 In the SA process, climatic factors is considered primarily under SA Objective 4: Climate Change Mitigation and SA Objective 5: Climate Change Adaptation, although there is some degree of overlap with aspects of many other SA Objectives (see **Appendix A**).

Box 2.4: Key issues regarding climatic factors identified during Scoping

- ⇒ Flooding from main rivers is an issue across the WLP area. The highest flooding risk is flash flooding from excessive overland flow or overtopping of minor watercourses. Therefore, surface water run-off management in the WLP area is an important issue on all developments of any size, clearly highlighting the need for a sustainable drainage system (SUDS) that maximise source control measures.
- ⇒ Climate change has the potential to increase the risk of fluvial and surface water flooding.
- ⇒ A range of further risks linked to climate change may affect the WLP area. These include the following:
 - an increased incidence of heat related illnesses and deaths during the summer;
 - increased risk of injuries and deaths due to increased number of storm events and flooding;
 - adverse effect on water quality from watercourse levels and turbulent flow after heavy rain and a reduction of water flow;
 - a need to increase the capacity of sewers; loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
 - an increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for local business; and
 - increased drought and flood related problems such as soil shrinkages and subsidence.
- ⇒ GI should be enhanced and expanded. New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change.

⁴⁵ JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 29/11/23]

2.6 Cultural heritage

- 2.6.1 Historic environment priorities from the international to the local level seek to address a range of issues, particularly in relation to the conservation and enhancement of heritage assets that are irreplaceable and play an important role in place making and the quality of life for local residents.
- 2.6.2 Wolverhampton has a rich industrial history. Many of the Listed Buildings and other designated heritage assets within the Plan area are associated with the numerous warehouses, factories, and network of canals that were opened during the Industrial Revolution, as well as the main town centre of Wolverhampton.
- 2.6.3 There are two Registered Parks and Gardens (RPGs), four Scheduled Monuments (SMs), 31 Conservation Areas (CAs), two Grade I, 23 Grade II* and 352 Grade II Listed Buildings located within the Plan area.
- 2.6.4 New Conservation Area Appraisals were prepared for existing CAs within Wolverhampton to support the plan making process. These Appraisals and the new CA boundaries have now been formally designated through Cabinet approval. This relates to three CAs: Bushbury Hill, Wightwick Bank and Vicarage Road (Penn). Wolverhampton also supports a range of non-designated heritage features. The Black Country Historic Landscape Characterisation (HLC) Study⁴⁶ aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country. The study identified several Historic Environment Area Designations (HEADs) within the Green Belt and in the urban area. The study also identified a number of Archaeological Priority Areas (APAs), which are considered to contain particularly rare or well-preserved remains of high archaeological and historic interest.
- 2.6.5 APAs are identified within the HLC as *"sites with a high potential for archaeological remains of regional or national significance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state or preservation of any remains to justify a designation"*. The APAs have been identified using the 'Scheduled Monuments and nationally important but non-scheduled monuments'⁴⁷.

⁴⁶ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 29/11/23]

⁴⁷ Historic England. Scheduled Monuments. Available at: <https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/> [Date accessed: 29/11/23]

- 2.6.6 CWC operates a Local List of Heritage Assets, including, buildings, structures, parks, gardens, and archaeological sites of local historic importance⁴⁸. Locally Listed Buildings do not meet national criteria for inclusion in the statutory list and are protected in their own right; the Council has compiled a list of these buildings to provide a measure of protection⁴⁹.
- 2.6.7 Areas of High Historic Townscape / Landscape Value (AHHTVs/AHHLVs) and Designed Landscapes of High Historic Value (DLHHVs) have also been identified within the HLC. AHHTVs are areas “*where built heritage makes a significant contribution to the local character and distinctiveness*” and have been identified due to their sense of place, street plan and form, streetscape, views and setting, and representation. DLHHVs are “*designed landscapes that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register of Parks and Gardens*” and have been identified due to the date, preservation, aesthetics, and associations with people and past events.
- 2.6.8 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. Adverse impacts on heritage assets can include direct loss or truncation of an asset, impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible.
- 2.6.9 It is assumed that designated heritage assets will not be lost as a result of development, unless otherwise specified by the WLP. It is anticipated that the WLP will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.
- 2.6.10 In the SA process, cultural heritage is considered under SA Objective 1: Cultural Heritage (see **Appendix A**).

Box 2.5: Key issues regarding cultural heritage identified during Scoping

- ⇒ Even though heritage assets will continue to benefit from legislative protection, development in the WLP area may have the potential to lead to effects on historic landscapes and cause direct damage to archaeological sites, monuments and buildings and / or their settings.
- ⇒ Archaeological remains, both seen, and unseen have the potential to be affected by new development areas.
- ⇒ There are six heritage assets in Wolverhampton listed on Historic England’s Heritage at Risk Register, which should be protected from inappropriate development.
- ⇒ The WLP should seek to improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering the retention and re-use, versus their replacement.

⁴⁸ City of Wolverhampton Council (2022). Conservation. Available at: <https://www.wolverhampton.gov.uk/planning/conservation> [Date accessed: 05/01/24]

⁴⁹ Wolverhampton History and Heritage Society. (No date). Listed Buildings. Available at: <http://www.historywebsite.co.uk/listed/lbs.htm> [Date accessed: 05/01/24]

2.7 Human health

Air quality

- 2.7.1 As discussed in **section 2.3**, the entirety of the WLP area is designated as AQMA⁵⁰. Development proposals located in close proximity to AQMAs or main roads would be likely to expose site end users to transport associated noise and air pollution, with adverse impacts on health and wellbeing.
- 2.7.2 As all the proposed development within the WLP is located within an AQMA, this is likely to lead to adverse impacts on health and may prevent CWC from achieving air quality targets. It is assumed that new development proposals within Wolverhampton would also result in an increase in traffic and thus traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.

Healthcare facilities

- 2.7.3 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the WLP should seek to ensure that residents have good access to NHS hospitals and GP surgeries.
- 2.7.4 There is one NHS hospital with an A&E department located within Wolverhampton (New Cross Hospital) and a total of 61 healthcare centres. Ideally, residents should be within an approximate ten-minute walking distance to their nearest GP surgery, whilst a hospital within 5km would be considered a sustainable distance. A large proportion of Wolverhampton is within a sustainable 15-minute walking distance or travel time via public transport to a GP surgery according to accessibility modelling data⁵¹.
- 2.7.5 At this stage, there is not sufficient information available to accurately predict the effect of new development on the capacity of these health facilities.

Green spaces and natural habitats

- 2.7.6 Opportunities to experience a diverse range of natural habitats is beneficial for physical and mental health and well-being. Good access to green/recreational areas can reduce stress, fatigue, anxiety and depression⁵². Good access to green spaces is associated with healthy foetal growth in pregnant women, higher birth weights, healthy microbiomes in babies and reduced rates of obesity and type 2 diabetes. Impacts of access to the natural environment are particularly significant for lower socio-economic groups.

⁵⁰ Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/media/6381/adopted-black-country-air-quality-spd-september-2016.pdf> [Date accessed: 29/11/23]

⁵¹ Unpublished data provided to Lepus by the Council

⁵² Houlden. V., Weich. S. and Jarvis. S. (2017) A cross-sectional analysis of green space prevalence and mental wellbeing in England

- 2.7.7 Providing residents with sustainable access to a diverse range of natural habitats is an effective means of reducing health inequalities in the area. Within the WLP area, there is a rich and diverse range of public open spaces, formal parks, outdoor recreational spaces, as well as the PRow network and the canal system. There are also several Country Parks surrounding the Plan area. All these open spaces positively contribute towards the health and wellbeing of residents, by helping to encourage physical exercise through sports, recreation and active travel. The recreational green spaces combined with the natural green space network would also benefit the mental health and wellbeing of residents.
- 2.7.8 The WLP area supports a network of biodiversity sites, providing local residents with opportunities to visit natural outdoor spaces and view wildlife (see **section 2.4**).
- 2.7.9 In the SA process, human health is considered primarily under SA Objective 12: Health, although there is some degree of overlap with other SA Objectives such as SA Objective 11: Equality (see **Appendix A**).

Box 2.6: *Key issues regarding human health identified during Scoping*

- ⇒ As all the proposed development within the WLP is located within an AQMA, this is likely to lead to adverse impacts on health, without intervention.
- ⇒ The increasing population in the City of Wolverhampton could have place pressure on the capacity of health infrastructure and leisure facilities.
- ⇒ The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services.

2.8 Landscape and townscape

Cannock Chase AONB

2.8.1 Cannock Chase Area of Outstanding Natural Beauty (AONB), also known as 'National Landscape', is a nationally designated landscape, located approximately 7km to the north of the Plan area at its closest point. Whilst new development in the WLP could potentially lead to adverse impacts on the AONB, such as through increased visitor pressures, it is not anticipated that there would be any adverse visual impacts on the AONB as a result of development proposed within the WLP, due to the distance from Wolverhampton's administrative area to the AONB.

Green Belt

2.8.2 The WLP area is heavily urbanised, but also contains some areas within the Black Country Green Belt, which surrounds the West Midlands Conurbation. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks. New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas.

2.8.3 Whilst the Green Belt is not a statutory landscape designation, it is a significant element of landscape protection in the area. The Green Belt is intended to⁵³:

- check the unrestricted sprawl of larger built-up areas;
- prevent neighbouring towns from merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.8.4 The Green Belt Study⁵⁴, carried out by LUC, classified parcels of Green Belt land into different 'harm' ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria.

2.8.5 No release of Green Belt land is proposed through the WLP.

⁵³ DLUHC (2023) National Planning Policy Framework Chapter 13: Protecting Green Belt land. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf [Date accessed: 29/11/23]

⁵⁴ LUC (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date accessed: 29/11/23]

Landscape character and sensitivity

- 2.8.6 The Black Country Landscape Sensitivity Assessment⁵⁵ assessed the sensitivity of Green Belt land to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of Green Belt land is susceptible to change as a result of future development. Parcels of land were classified ranging from 'high' to 'low' sensitivity.
- 2.8.7 It should be noted that although there is a relationship between the Landscape Sensitivity Assessment and the Green Belt Harm Assessment, the Green Belt Study states that "*there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land*".
- 2.8.8 There is no evidence available to inform the SA assessments with regard to the landscape character or sensitivity of Wolverhampton's urban areas. Baseline information relating to the historic environment, including the Historic Landscape Characterisation and associated designations, is considered under 'cultural heritage' (see **section 2.6**).
- 2.8.9 In the SA process, landscape and townscape are considered primarily under SA Objective 2: Landscape (see **Appendix A**).

Box 2.7: Key issues regarding landscape and townscape identified during Scoping

- ⇒ Parts of Wolverhampton lie within the West Midlands Green Belt.
- ⇒ The WLP area is amongst the least tranquil areas of the West Midlands.

⁵⁵ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 29/11/23]

2.9 Population and material assets

Population

2.9.1 In Wolverhampton, the population size has increased by 5.7%, from around 249,500 in 2011 to 263,700 in 2021. This is lower than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800. At 5.7%, Wolverhampton's population increase is slightly lower than the increase for the West Midlands (6.2%)⁵⁶.

Equality

2.9.2 The WLP area is an ethnically diverse area, with individuals from many different religions, cultures, communities and backgrounds. According to Census data, it has a growing population from Black and Minority Ethnic communities.

2.9.3 The WLP area is home to a people from a range of socio-economic status who may also experience discrimination, poverty and social exclusion. Child poverty levels are relatively high. In the West Midlands, 22.7% of children are from low-income families⁵⁷.

2.9.4 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. According to the IMD (2019)⁵⁸, out of 317 Local Authorities in England, Wolverhampton is ranked as the 24th most deprived. Overall, deprivation is high across the WLP area, with 33 LSOAs in Wolverhampton ranked among the 10% most deprived in England.

Employment

2.9.5 Wolverhampton City Centre provides a range of retail, office and leisure floorspace. Transport modelling data⁵⁹ indicates that almost the entirety of the WLP area is within a 30-minute travel time to an employment site, either via walking or public transport. The majority of new residents across the Plan area would therefore be expected to be located within a sustainable distance to jobs. New developments in the urban area would be expected to have good sustainable transport connections to nearby employment opportunities.

⁵⁶ Office of National Statistics. Census 2021. Available at:

<https://www.ons.gov.uk/visualisations/censuspopulationchange/E08000031/> [Date accessed: 29/11/23]

⁵⁷ Department for Work and Pensions (2022) Households below average income (HBAI) statistics. Available at:

<https://www.gov.uk/government/collections/households-below-average-income-hbai--2> [Date accessed: 29/11/23]

⁵⁸ Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/iod2019_Statistical_Release.pdf [Date accessed: 29/11/23]

⁵⁹ Unpublished data provided to Lepus by the Council

Education, skills and training

- 2.9.6 There are a total of 94 primary and 22 secondary schools in the WLP area, and further schools serving the area which are located in adjacent authorities. It is assumed that new residents in the Plan area require access to primary and secondary education to help facilitate good levels of education, skills and qualifications of residents.
- 2.9.7 There are a number of further and higher education opportunities within the WLP area and adjacent districts including the University of Wolverhampton, Dudley College of Technology and Sandwell College. Within the wider West Midlands, there are several universities including the University of Birmingham, Birmingham City University and Aston University.

Waste

- 2.9.8 The proposed development within the WLP area and associated increase in residents would be expected to result in a significant increase in waste produced. It is assumed that new residents in the WLP area will have an annual waste production of approximately 409kg per person, in line with the average for England in 2021⁶⁰.
- 2.9.9 The proportion of local authority collected waste in the West Midlands sent for recycling and composting is below the national levels, whereas the waste managed through incineration is higher than national levels.
- 2.9.10 Although national trends suggest that the volume of household waste produced is decreasing, the Black Country Waste Study⁶¹ indicates that additional capacity for certain types of waste management will be required, taking into account the large amount of projected growth in the area as well as continuing to facilitate the import of waste from other neighbouring authorities.

Housing

- 2.9.11 Government guidance requires local authorities to determine the local housing need figure for their area. The local plan process should then test the deliverability of this housing need figure within the local authority area. The local housing need figure is calculated by summing the national standard method figure. This method uses 2014-based ONS household projections and affordability ratios which are updated annually⁶².

⁶⁰ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

⁶¹ Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf [Date accessed: 29/11/23]

⁶² Black Country Plan. Black Country Urban Capacity Review Update (may, 2021) Accessed at: <https://blackcountryplan.dudley.gov.uk/media/17940/bc-urban-capacity-review-update-2020-may-2021-final-140521.pdf> [Date accessed: 29/11/23]

- 2.9.12 CWC have produced a Strategic Housing Land Availability Assessment (SHLAA)⁶³, which will be updated annually, to assess land with potential for development in order to inform the housing land supply and trajectory. Sites for consideration in the WLP have been identified through the 'call for sites' process.
- 2.9.13 A key element of the WLP's vision is to create a network of cohesive, healthy and prosperous communities. It is assumed that development proposals will provide a good mix of housing types and tenures in order to meet the identified needs for the population, including affordable housing and accessible housing particularly for people aged 65 and over.
- 2.9.14 In the SA process, population and material assets are considered under several SA Objectives. Population is a broad matter, which has been addressed under SA Objective 9: Transport and Accessibility, SA Objective 10: Housing, SA Objective 11: Equality, SA Objective 12: Health, SA Objective 13: Economy and SA Objective 14: Education, Skills and Training. Material assets covers a variety of built and natural assets which are accounted for in a range of SA Objectives, including SA Objective 6: Natural Resources, SA Objective 7: Pollution and SA Objective 8: Waste. The full SA Framework is presented in **Appendix A**.

Box 2.8: *Key issues regarding population and material assets identified during Scoping*

- ⇒ The population of the City of Wolverhampton is expected to continue to increase, this will have secondary effects.
- ⇒ New business start-ups should continue to be encouraged in the WLP area.
- ⇒ NVQ qualifications in Wolverhampton are generally lower than regional and national percentages.
- ⇒ The employment level for Wolverhampton is lower than that for Great Britain overall.
- ⇒ House prices are expected to increase and demand for housing will remain high.
- ⇒ Energy consumption from industrial and commercial sources in Wolverhampton is high and is expected to increase.
- ⇒ There is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill for waste disposal.
- ⇒ There is a need to identify and support opportunities for renewable energy provision locally.

⁶³ City of Wolverhampton Council (2023) Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) Update as of April 2022, Published: Published 2023. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-09/Wolverhampton-SHLAA-2022.pdf> [Date accessed: 29/11/23]

2.10 Soil and water resources

Soil

- 2.10.1 Although the majority of Wolverhampton has been urbanised, the WLP area has a diverse underlying soil resource. Soil is an essential and non-renewable resource that provides a range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines. It is also one of the most important natural carbon sinks and is vital in efforts to mitigate climate change.
- 2.10.2 It is therefore important for decision makers to make best efforts to preserve soil resources. Development can potentially have adverse impacts on soil stocks, such as by direct loss of soil (e.g. excavating), contamination, increased erosion, breakdown of structure and loss of nutrients.
- 2.10.3 In accordance with paragraph 180 of the NPPF⁶⁴, development can have an irreversible adverse (cumulative) impact on the finite stock of best and most versatile (BMV) land. Avoiding the loss of BMV land is a priority as mitigation is rarely possible. BMV is usually indicated by Agricultural Land Classification (ALC). The ALC system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as BMV land⁶⁵. The grades are as follows:
- Grade 1 – excellent quality agricultural land
 - Grade 2 – very good quality agricultural land
 - Grade 3 – good to moderate quality agricultural land
 - Subgrade 3a – good quality agricultural land
 - Subgrade 3b – moderate quality agricultural land
 - Grade 4 – poor quality agricultural land
 - Grade 5 – very poor-quality agricultural land
- 2.10.4 The majority of land in the WLP area is ALC 'urban', with pockets of ALC Grade 2, 3 and 4.

⁶⁴ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/24]

⁶⁵ MAFF (1988) Agricultural Land Classification of England And Wales: Revised criteria for grading the quality of agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 29/11/23]

- 2.10.5 In accordance with the core planning principles of the NPPF, development on previously developed land (PDL) will be recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land, and is expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.
- 2.10.6 It should be noted that PDL could also be of environmental value, and as such, potential impacts on natural resources should be considered on a site-by-site basis.
- 2.10.7 Many urban brownfield sites in the WLP area, and some greenfield sites, are affected by the legacy of mining in the area. The exploitation of minerals has led to some localised issues with ground contamination and instability⁶⁶. It is anticipated that development proposals within the WLP will require site-specific assessments of ground contamination and effective remediation of soils affected prior to development.

Water

- 2.10.8 Wolverhampton is supplied with water by Severn Trent Water and South Staffs Water. Sewerage services are also provided by Severn Trent Water and South Staffs Water. Drivers of increased water demand include increase in population, decrease in household occupancy and climate change. Severn Trent Water⁶⁷ and South Staffs Water⁶⁸ plan to manage and meet future demand through encouraging water use efficiency, for example by installing water meters, and reducing leakage. Severn Trent water are currently in the process of creating an updated draft plan that would cover the period 2025-2085⁶⁹. South Staffs Water are aiming to publish their updated plan in 2024⁷⁰.
- 2.10.9 It is assumed that all residential-led development proposals in the WLP will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.
- 2.10.10 The volume of wastewater is likely to increase following development in the WLP area. Wastewater treatment plants will need to ensure there is the capability to withstand the additional capacity and be expanded if necessary, prior to development taking place.

⁶⁶ Mott Macdonald (2009) Black Country JCS Stage 2: Infrastructure and Deliverability Study. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p1/t1p1f/> [Date accessed: 29/11/23]

⁶⁷ Water Resources Management Plan 2019. Available at: <https://www.stwater.co.uk/content/dam/stw-plc/our-plans/severn-trent-water-resource-management-plan.pdf> [Date accessed: 01/12/23]

⁶⁸ South Staffs Water. Water Resources Management Plan 2019. Available at: <https://www.south-staffs-water.co.uk/media/2676/final-wrmp-2019-south-staffs-water.pdf> [Date accessed: 01/11/23]

⁶⁹ Severn Trent Water (2022) Draft Water Resource Management Plan 2024. Available at: <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/> [Date accessed: 29/11/23]

⁷⁰ South Staffs Water (2023) Water Resources Management Plan. Available at: <https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-management-plan> [Date accessed: 29/11/23]

- 2.10.11 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water⁷¹. Watercourses that pass through the city of Wolverhampton include the River Penk, River Tame and Smestow Brook, in addition to the canal network.
- 2.10.12 An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted⁷². However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. Each development proposal would need to be evaluated according to land use type, size of development and exact location to determine the potential impacts on water quality.
- 2.10.13 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. There are three categories of SPZ⁷³ as follows:
- Zone 1 – Inner Protection Zone: the 50-day travel time from any point below the water table to the source, with a minimum radius of 50m
 - Zone 2 – Outer Protection Zone: the 400-day travel time from a point below the water table to the source, with a minimum radius of 250-500m
 - Zone 3 – Source Catchment Protection Zone: area around a source within which all groundwater recharge is discharged at the source
- 2.10.14 SPZs are present in west of WLP area, which is predominantly SPZ 3, with smaller areas of SPZ 1 and 2.
- 2.10.15 The topic of flooding is relevant to the themes of soil, water and climate change. Flooding has been addressed under climate change in **section 2.5**.
- 2.10.16 In the SA process, soil and water resources are considered primarily under SA Objective 6: Natural Resources and SA Objective 7: Pollution (see **Appendix A**).

⁷¹ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: <https://www.who.int/publications/i/item/0419217304> [Date accessed: 29/11/23]

⁷² Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 29/11/23]

⁷³ Environment Agency (2019) Manual for the production of Groundwater Source Protection Zones – March 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822402/Manual-for-the-production-of-Groundwater-Source-Protection-Zones.pdf [Date accessed: 29/11/23]

Box 2.9: *Key issues regarding soil and water resources identified during Scoping*

- ⇒ Soil is a non-renewable resource that would continue to be lost. The majority of land in the WLP area is ALC 'urban', with pockets of ALC Grade 3 and ALC Grade 4, which may be under threat from new growth areas and associated infrastructure.
- ⇒ The development of new and improved infrastructure to accompany growth has the potential to lead to an increase in soil erosion and soil loss.
- ⇒ A proportion of Wolverhampton contains groundwater SPZs.

3 Assessment methodology and scope of appraisal

3.1 Assessment of reasonable alternatives

3.1.1 Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of 14 SA Objectives. **Table 3.1** summarises the SA Objectives and their relevance to the SEA themes.

Table 3.1: Summary of SA Objectives

	SA Objectives	Relevant SEA Topic
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance	Cultural heritage
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place	Landscape and cultural heritage
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	Climate change mitigation: Minimise Wolverhampton’s contribution to climate change.	Climatic factors
5	Climate change adaptation: Plan for the anticipated levels of climate change.	Climatic factors, soil, water
6	Natural resources: Protect and conserve natural resources.	Soil, water and material assets
7	Pollution: Reduce air, soil, water and noise pollution	Air, water, soil and human health
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	Material assets
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Climatic factors and material assets
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	Population
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	Health: Safeguard and improve community health, safety and wellbeing.	Population and human health
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

- 3.1.2 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations⁷⁴. Including the SEA topics in the SA Objectives helps to ensure that all of the environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 3.1.3 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.
- 3.1.4 The purpose of this document is to provide an appraisal of reasonable alternatives, also known as 'options', in line with Regulation 12 of the SEA Regulations⁷⁵:
- 3.1.5 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*
- 3.1.6 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 3.1**).

⁷⁴ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."

⁷⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 29/11/23]

Box 3.1: Schedule 1 of the SEA Regulations⁷⁶

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

3.2 Impact assessment and determination of significance

3.2.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

3.3 Sensitivity

3.3.1 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

3.3.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 3.2**. For most receptors, sensitivity increases with geographic scale.

⁷⁶ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 29/11/23]

Table 3.2: *Impact sensitivity*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

3.4 Magnitude

3.4.1 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 3.3**).

Table 3.3: *Impact magnitude*

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> Likely total loss of or major alteration to the receptor in question; Provision of a new receptor/feature; or The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> Frequent and short-term; Frequent and reversible; Long-term (and frequent) and reversible; Long-term and occasional; or Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> Reversible and short-term; Reversible and occasional; or Short-term and occasional.

3.5 Significant effects

3.5.1 A single value from **Table 3.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.

3.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: "*short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table 3.4: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<ul style="list-style-type: none"> • The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- 3.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle⁷⁷ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.
- 3.5.4 For the assessment of reasonable alternative sites, to enable further transparency and to provide the reader with contextual information that is relevant to each SA Objective, the full assessments presented in the SA report appendices have been set out per 'receptor'. The methodology used to assess reasonable alternative sites throughout the SA process, which sets out the receptors considered for each SA Objective, is presented in **section 3.8**.
- 3.5.5 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 3.5.6 The level of effect has been categorised as minor or major. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 3.5.7 Each reasonable alternative or option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 3.4**. Likely impacts are not intended to be summed.
- 3.5.8 It is important to note that the assessment scores presented in **Table 3.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Chapter 2** and **section 3.8**), offering further insight into how each significant effect score was determined. These should be borne in mind when considering the assessment findings.

3.6 Limitations of predicting effects

- 3.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

⁷⁷ The European Commission describes the precautionary principle as follows: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

- 3.6.2 It should be noted that for the purpose of this SA report, all assessments have been prepared without consideration of detailed mitigation, which can be factored in at the next stage once the WLP policies have been drafted.
- 3.6.3 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 3.6.4 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.
- 3.6.5 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. The appraisal of the WLP is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects.
- 3.6.6 All data used is secondary data obtained from the Council or freely available on the Internet.

3.7 Methodology for assessment of growth options and policy areas

- 3.7.1 The appraisal of growth options (housing, employment and Gypsy and Traveller), spatial strategy options and policy areas aims to assess the likely significant effects of each proposed option, based on the criteria set out in the SEA Regulations (see **Box 3.1**).
- 3.7.2 **Table 3.5** sets out a guide to how likely impacts have been determined in the assessment of options within this report.

Table 3.5: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

3.7.3 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distill the wide-ranging effects of a broad growth option into one overall impact.

3.7.4 The appraisal of each option should be read alongside the local context and assumptions set out in **Chapter 2**.

3.8 Methodology for assessment of reasonable alternative sites

3.8.1 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how different receptors should be considered in the appraisal process for reasonable alternative sites.

3.8.2 The receptors considered for each SA Objective have been discussed within the local context and assumptions set out in **Chapter 2**. The appraisal of reasonable alternative sites should be read in conjunction with this chapter.

3.8.3 The topic-specific methodologies set out in **Boxes 3.1 to 3.14** explain how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 3.4**.

3.8.4 All distances stated in site assessments are measured 'as the crow flies' from the closest point of the site/receptor in question, unless otherwise stated.

3.8.5 **Appendix C** sets out the detailed appraisal of each reasonable alternative site proposed. The appraisal evaluates the likely significant effects of each reasonable alternative against the 14 SA Objectives.

SA Objective 1: Cultural heritage

- 3.8.6 Box 3.1 sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.
- 3.8.7 As discussed within **section 2.6**, impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. As such, the level of the impact when considered at the pre-mitigation stage has been assessed based on the nature and significance of, and proximity of the proposal to, the heritage asset in question.
- 3.8.8 It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development. Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets⁷⁸ that are important components of the local area. Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.

Box 3.2: SA Objective 1: Cultural heritage strategic assessment methodology

Score	Likely impact – Grade I Listed Building
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.
-	Development proposal located within the wider setting of a Grade I Listed Building.
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.

Notes

Grade I Listed Buildings are considered to be those of exceptional interest.
 Data for heritage assets⁷⁹, including the Heritage at Risk Register⁸⁰, available from Historic England.

Score	Likely impact – Grade II* Listed Building
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.
-	Development proposal located within the setting of a Grade II* Listed Building.

⁷⁸ Setting is taken to mean the surroundings in which a heritage asset may be experienced, which does not relate solely to distance from proposed developments to heritage assets. Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3 (2nd Edition). Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date accessed: 29/11/23]

⁷⁹ Historic England (2023) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 29/11/23]

⁸⁰ Historic England (2023) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date accessed: 29/11/23]

Score	Likely impact – Grade II* Listed Building
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.

Notes

Grade II* Listed Buildings are considered to be those of more than special interest.
 Data sourced from Historic England as above.

Score	Likely impact – Grade II Listed Building
--	Development proposal coincides with a Grade II Listed Building.
-	Development proposal located within the setting of a Grade II Listed Building.
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.

Notes

Grade II Listed Buildings are considered to those of special interest.
 Data sourced from Historic England as above.

Score	Likely impact – Scheduled Monument
--	Development proposal coincides with a SM.
-	Development proposal located within the setting of a SM.
0	Development proposal not considered to impact an SM or its setting.
+	Development proposal which could potentially enhance an SM or its setting.

Notes

Scheduling is the selection of a sample of nationally important archaeological sites.
 Data sourced from Historic England as above.

Score	Likely impact – Registered Parks and Gardens
--	Development proposal coincides with an RPG.
-	Development proposal located within the setting of an RPG.
0	Development proposal not considered likely to impact an RPG or its setting.
+	Development proposal which could potentially enhance an RPG or its setting.

Notes

The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection.

Notes

Data sourced from Historic England as above.

Score	Likely impact – Conservation Areas
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.
0	Development proposal not considered to impact a Conservation Area or its setting.
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.

Notes

Conservation Area data provided by CWC.
 Information available for Wolverhampton⁸¹ authority.

Score	Likely impact - Archaeological Priority Area
-	Development proposal coincides with an APA.
0	Development proposal does not coincide with an APA.
+	Development proposal which could potentially enhance an APA.

Notes

Archaeology data provided by CWC and detailed within the HLC report⁸².

Score	Likely impact - Historic Landscape Characterisation
-	Development proposal located within an area of high historic landscape or townscape value and/or area designed landscape of high historic value.
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes.
+	Development proposal which could potentially enhance historic character.

Notes

HLC data provided by CWC and detailed within the HLC report⁸³.

⁸¹ City of Wolverhampton Council (2022) Conservation. Available at:
<https://www.wolverhampton.gov.uk/planning/conservation> [Date accessed: 29/11/23]

⁸² Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at:
https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
 [Date accessed: 29/11/23]

⁸³ Ibid

SA Objective 2: Landscape

- 3.8.9 **Box 3.2** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.
- 3.8.10 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.
- 3.8.11 As discussed within **section 2.8**, adverse effects on Cannock Chase AONB are unlikely given the distance from the Plan area, and as such this has not been considered as a receptor within the site assessments. Additionally, there is no landscape / townscape sensitivity or character evidence available to inform the assessment of sites within Wolverhampton’s urban area, beyond the HLC information as discussed under SA Objective 1: Cultural Heritage (see **Box 3.1**).

Box 3.3: SA Objective 2: Landscape strategic assessment methodology

Score	Likely impact – Landscape Sensitivity
--	Development proposals located within areas of ‘moderate-high’ or ‘high’ landscape sensitivity.
-	Development proposals located within areas of ‘low-moderate’ or ‘moderate’ sensitivity.
+/-	Development proposal located outside of the Landscape Sensitivity Assessment study area.
0	Development proposals located within areas of ‘low’ sensitivity.
+	Development proposals which would protect or enhance features of the landscape as identified within the study.

Notes

Appraisal of sites informed by the Black Country Landscape Sensitivity Assessment⁸⁴.

Score	Likely impact – views for local residents
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by local residents.
0	Development proposals are not considered to significantly alter views experienced by local residents.
+	Development proposals which could potentially improve the views experience by some local residents.

⁸⁴ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 29/11/23]

Notes

Views and proximity to existing residential development have been identified through the use of aerial photography and Google Maps⁸⁵.
 Potential positive impacts would be dependent upon the current views, and level of detail of the proposed development.

Score	Likely impact - Views from the PRoW network
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRoW network.
0	Development proposals are not considered to significantly alter views experienced by users of the PRoW network.
+	Development proposals which could potentially improve the views experienced from the nearby PRoW network.

Notes

PRoW data provided by CWC.
 Views have been identified through the use of aerial photography and Google Maps⁸⁶.

⁸⁵ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

⁸⁶ Ibid

SA Objective 3: Biodiversity, flora, fauna and geodiversity

3.8.12 **Box 3.3** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

3.8.13 Where a site is coincident with, adjacent to or located in close proximity to an ecological receptor, it is assumed that there is potential for negative effects associated with development to arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

Box 3.4: SA Objective 3: Biodiversity, flora, fauna and geodiversity strategic assessment methodology

Score	Likely impact - Habitats site e.g. SAC, SPA or Ramsar site
--	Development proposal coincides with, or is located in close proximity to, a Habitats site. Likelihood of direct impacts.
-	Development proposal is located within a recognised ZOI or similar spatial catchment relative to the Habitats site. Likelihood of direct or indirect impacts.
+/-	Development located outside of a recognised ZOI where, in absence of HRA conclusions, the effect of development is uncertain.
0	Development not anticipated to result in adverse impacts on Habitats sites.
+	Development proposals which would be expected to enhance features within a Habitats site.

Notes

Data for SACs from Natural England⁸⁷.

It should be noted that the HRA will provide further detail relating to potential impacts on Habitats sites within and surrounding the Plan area.

Score	Likely impact - SSSI
--	Development coincides with, or is located adjacent to, an SSSI.
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.
0	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.
+	Development proposals which would enhance features of an SSSI.

⁸⁷ Natural England (2023) Special Areas of Conservation (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf0_0 [Date accessed: 29/11/23]

Notes

Data for SSSIs and IRZs from Natural England⁸⁸.

Score	Likely impact - NNR
--	Development coincides with an NNR. Likelihood of direct impacts.
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on NNRs.
+	Development proposals which would enhance or create an NNR.

Notes

Data for NNRs from Natural England⁸⁹.

Score	Likely impact – ancient woodland
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.
0	Development proposal would not be anticipated to impact ancient woodland.
+	Development proposals which would enhance ancient woodland.

Notes

Data for ancient woodlands from Natural England⁹⁰.

Score	Likely impact - SINC
--	Development proposal coincides with a SINC. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a SINC. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SINC.
+	Development proposals which would enhance or create a SINC.

⁸⁸ Natural England (2023) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest, 31 July 2022. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date accessed: 29/11/23]

⁸⁹ Natural England (2023) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date accessed: 21/12/23]

⁹⁰ Natural England (2023) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdc7e9df7d3/ancient-woodland-england> [Date accessed: 29/11/23]

Notes

Data for SINC's provided by CWC. Including the recently adopted 'Alexander Metals' SINC.

Score	Likely impact - LNR
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on an LNR.
+	Development proposals which would enhance or create an LNR.

Notes

Data for LNRs from Natural England⁹¹.
 Adopted Wyrley and Essington Canal LNR data from CWC.

Score	Likely impact - SLINC
-	Development proposal anticipated to result in adverse impacts on a SLINC, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SLINC.
+	Development proposals which would enhance or create a SLINC.

Notes

Data for SLINC's provided by CWC.

Score	Likely impact – geological conservation
-	Development proposal anticipated to result in adverse impacts on a geological site, due to location or proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on a Geological Site.
+	Development proposal anticipated to enhance a geological site.

Notes

Data for geological sites provided by CWC and data for underlying geological context provided by British Geological Survey.

Score	Likely impact – priority habitat
-	Development proposal coincides with a priority habitat.
0	Development proposal does not coincide with a priority habitat.
+	Development proposals which enhance or create a priority habitat.

⁹¹ Natural England (2022) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date accessed: 29/11/23]

Notes

Data for priority habitats from Natural England⁹².

⁹² Natural England (2023) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 29/11/23]

SA Objective 4: Climate change mitigation

- 3.8.14 **Box 3.4** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.
- 3.8.15 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment of carbon emissions. The 1% principle as set out in **Box 3.4** is only a coarse precautionary indicator, and greater detail of carbon data would help to better quantify effects.

Box 3.5: SA Objective 4: Climate change mitigation strategic assessment methodology

Score	Likely impact – carbon emissions
--	Residential-led development which could potentially result in an increase in CO ₂ emissions by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in CO ₂ emissions by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in CO ₂ emissions.
+/-	Non-residential or Gypsy and Traveller development where the carbon emissions produced as a result of the proposed development is uncertain
+	Development proposals which include energy saving or renewable energy technologies.
	Development proposals which would reduce reliance on private car use, encourage active travel or the use of public transport.

Notes
<p>Figures calculated using UK local authority CO₂ emissions data⁹³ and the number of people per dwelling⁹⁴, such that proposals for 1,135 homes or more are expected to increase carbon emissions by 1% or more in comparison to the current estimates for Wolverhampton.</p> <p>Proposals for 114 homes or more are expected to increase carbon emissions by 0.1% or more in comparison to current estimates for Wolverhampton.</p>

⁹³ DBEIS (2022) UK local authority and regional carbon dioxide emissions national statistics: 2005-2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020> [Date accessed: 29/11/23]

⁹⁴ People per Dwelling has been calculated using the 2021 Census population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

SA Objective 5: Climate change adaptation

3.8.16 **Box 3.5** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

3.8.17 It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial or surface water flooding.

Box 3.6: SA Objective 5: Climate change adaptation strategic assessment methodology

Score	Likely impact – Flood Zones
--	Development proposals which coincide with Flood Zone 3.
-	Development proposals which coincide with Flood Zone 2.
+	Development proposals which are located wholly within Flood Zone 1.

Notes

Data for fluvial flooding has been derived from the latest available Environment Agency Flood Map for Planning (Rivers and Sea)⁹⁵, such that:

- Flood Zone 3: Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year;
- Flood Zone 2: Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and
- Flood Zone 1: Less than 0.1% chance of river and sea flooding in any given year.

Score	Likely impact – surface water flooding
--	Development proposals which coincide with areas at high risk of surface water flooding.
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.
0	Development proposals which are not located in areas determined to be at risk of surface water flooding.
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures

Notes

Based on the Environment Agency surface water flood risk data⁹⁶, such that:

- High risk: 3.3+% chance of flooding each year;
- Medium risk: between 1% - 3.3% chance of flooding each year; and

⁹⁵ Environment Agency (2023) Flood Map for Planning (Rivers and Sea) – Flood Zone 2 and Flood Zone 3. Available at: <https://www.data.gov.uk/dataset/cf494c44-05cd-4060-a029-35937970c9c6/flood-map-for-planning-rivers-and-sea-flood-zone-2> and <https://www.data.gov.uk/dataset/bed63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3> [Date accessed: 29/11/23]

⁹⁶ Environment Agency (2013) Risk of flooding from surface water. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8986_eff_63d.pdf [Date accessed: 29/11/23]

Notes

- Low risk: between 0.1% - 1% chance of flooding each year.

Score

Likely impact – Indicative Flood Zone 3b

--

Development proposals which coincide with Indicative Flood Zone 3b.

0

Development proposals which do not coincide with Indicative Flood Zone 3b.

Notes

Data for Indicative Flood Zones produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA)⁹⁷

⁹⁷ JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 29/11/23]

SA Objective 6: Natural resources

- 3.8.18 **Box 3.6** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.
- 3.8.19 In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.
- 3.8.20 The natural resources objective also considers potential effects on mineral resources. Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. There are no Mineral Safeguarding Areas or Areas of Search identified within Wolverhampton in the Black Country Minerals Study⁹⁸; as such all proposed development sites would be expected to have a negligible impact on mineral resources based on the current evidence available.

Box 3.7: SA Objective 6: Natural resources strategic assessment methodology

Score	Likely impact - previously developed (brownfield) land / land with environmental value
-	Development proposal located on previously undeveloped land and/or land with potential environmental value.
+	Development proposal located on previously developed land with no environmental value.

Notes

Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF⁹⁹. Assessment of current land use and potential environmental value has been made through reference to aerial photography using Google Maps. It should be noted that this may not reflect the current status of the site, and the nature / layout of proposed development within the site boundary is unknown, so a degree of uncertainty remains.

Score	Likely impact - ALC
--	Development proposals which are situated on Grade 1, 2, or 3 ALC land comprising 20ha or more.
-	Development proposals which are situated on Grade 1, 2 or 3a ALC land comprising less than 20ha.
0	Development proposals located on previously undeveloped land with no environmental value.
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.

⁹⁸ wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date accessed: 17/01/24]

⁹⁹ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/24]

Notes

ALC data available from Natural England¹⁰⁰. Where Grade 3 data is not sub-divided into 3a or 3b, it is assumed that 3a is present.

A 20ha threshold has been used based on Natural England guidance¹⁰¹.

¹⁰⁰ Natural England (2019) Agricultural Land Classification o(ALC) (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094 [Date accessed: 01/11/23]

¹⁰¹ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 10/01/24]

SA Objective 7: Pollution

- 3.8.21 **Box 3.7** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.
- 3.8.22 The assessment under this objective considers the potential for reasonable alternative sites to generate pollution associated with the construction and occupation of new development, as well as the potential to expose site end users to existing sources of pollution.

Box 3.8: SA Objective 7: Pollution strategic assessment methodology

Score	Likely impact - AQMA
-	All development proposals in Wolverhampton are located within an AQMA.
Notes	
UK AQMA data available from Defra ¹⁰² .	

Score	Likely impact – main road
-	Development proposals located within 200m of a main road.
0	Development proposals located over 200m from a main road.
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.

Notes	
Road data available from the Ordnance Survey ¹⁰³ .	
A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance ¹⁰⁴ .	

Score	Likely impact – Water quality
-	Development proposals located within 10m of a watercourse.
+/-	Development proposals located over 10m from a watercourse.
+	Development proposal includes integration of GI or the naturalisation of watercourses.

¹⁰² Department for Environment Food and Rural Affairs (2022) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 01/12/23]

¹⁰³ Ordnance Survey (2022) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 01/12/23]

¹⁰⁴ Department for Transport (2023) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 01/12/23]

Notes

Watercourse mapping data available from the Ordnance Survey¹⁰⁵.

A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per available guidance¹⁰⁶.

Score Likely impact – groundwater SPZ

- Development proposal coincides with a groundwater SPZ.

0 Development proposal does not coincide with a groundwater SPZ.

Notes

SPZ data available from the Environment Agency¹⁰⁷. Groundwater source catchments are divided into three zones:

- Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;
- Outer Zone (Zone II) – 400-day travel time; and
- Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.

Score Likley impact – increase in air pollution

-- Development proposals which could potentially result in a significant increase in air pollution.

- Development proposals which could potentially result in a minor increase in air pollution.

0 Development would be expected to result in a negligible increase in air pollution.

+/- The air pollution likely to be generated as a result of development proposals is uncertain. Including development proposals for Gypsy and Traveller use.

Notes

It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution¹⁰⁸. Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.

¹⁰⁵ Ordnance Survey (2023) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 01/12/23]

¹⁰⁶ DAERA (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 01/12/23]

¹⁰⁷ Environment Agency (2023) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 01/12/23]

¹⁰⁸ Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8. Available at: <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> [Date accessed: 01/12/23]

Notes

Where a site is proposed for the development of nine dwellings or less, or for 0.99ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.

SA Objective 8: Waste

- 3.8.23 **Box 3.8** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.
- 3.8.24 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment against waste. The 1% principle as set out in **Box 3.8** is only a coarse precautionary indicator, and greater detail of waste data would help to better quantify effects. The amount and type of waste produced will vary depending upon the specific site circumstances and end use and may have differing implications for the management of waste; such detail is not available to inform the assessment of reasonable alternative sites.

Box 3.9: SA Objective 8: Waste strategic assessment methodology

Score	Likley impact - waste
--	Residential-led development which could potentially result in an increase in household waste generation by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in household waste generation by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in household waste generation.
+/-	The waste generated as a result of development proposals for non-residential or Gypsy and Traveller use is uncertain.
+	Development proposals which include provision of waste and recycling storage.
++	Development proposals for waste or recycling facilities.

Notes
<p>Figures calculated using UK local authority household waste data¹⁰⁹ and the number of people per dwelling¹¹⁰, such that proposals for 1,115 homes or more are expected to increase household waste generation by 1% or more in comparison to the current estimates for Wolverhampton.</p> <p>Proposals for 111 homes or more are expected to increase household waste generation by 0.1% or more in comparison to current estimates for Wolverhampton.</p>

¹⁰⁹ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

¹¹⁰ People per Dwelling has been calculated using the 2021 Census population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021>) and dwelling stock Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date accessed: 01/12/23]

SA Objective 9: Transport and accessibility

3.8.25 **Box 3.9** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

Box 3.10: SA Objective 9: Transport and accessibility strategic assessment methodology

Score	Likely impact – access to bus stop
-	Development proposals where the majority of the site is located over 400m from a bus stop
+	Development proposals where the majority of the site is located within 400m of a bus stop

Notes

Bus stop data available from Transport for West Midlands¹¹¹.

Target distance of 400m to a bus stop in line with Barton *et al.* sustainable distances¹¹².

Score	Likely impact – access to railway or metro station
-	Development proposals where the majority of the site is located over 2km from a railway or metro station.
+	Development proposals where the majority of the site is located within 2km of a railway or metro station.

Notes

Railway station data available from Transport for West Midlands.

Target distance of 2km to a railway station in line with Barton *et al.* sustainable distances.

Score	Likely impact – pedestrian access
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.

Notes

Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps¹¹³.

¹¹¹ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 01/12/23]

¹¹² Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

¹¹³ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

Score	Likely impact – road access
-	Development proposals located in areas which currently have poor access to the surrounding road network.
+	Development proposals which are adjacent to an existing road.

Notes

Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps¹¹⁴.

Score	Likely impact – pedestrian access to local services
-	Development proposals where the majority of the site is located over a 15-minute walk to local services.
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to local services.
++	Development proposals where the majority of the site is located within a 10-minute walk to local services.

Notes

Data on fresh food centre locations and accessibility modelling (travel time to fresh food and centres) provided by CWC.

Score	Likely impact – public transport access to local services
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to local services.
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to local services.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to local services.

Notes

Data on fresh food centre locations and accessibility modelling (travel time to fresh food centres) provided by CWC.

¹¹⁴ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

SA Objective 10: Housing

3.8.26 **Box 3.10** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

Box 3.11: SA Objective 10: Housing strategic assessment methodology

Score	Likely impact – provision of housing
--	Development proposals which result in a significant net decrease in housing.
-	Development proposals which result in a minor net decrease in housing.
0	Development proposals would not impact housing provision.
+	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).
++	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).

Notes

Estimated housing capacity provided by CWC.

At this stage of the assessment process, information is not available relating to the specific housing mix / type that would be delivered through each reasonable alternative site, including potential for development of affordable homes. It is assumed that development options will provide a good mix of housing type and tenure opportunities.

SA Objective 11: Equality

3.8.27 **Box 3.11** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

Box 3.12: SA Objective 11: Equality strategic assessment methodology

Score	Likely impact- Index of Multiple Deprivation
-	Development proposals within most deprived 10 percent LSOAs in England. Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.
0	Development proposals outside most deprived 10 percent LSOAs in England. Development proposals would be expected to have no significant impact on equality.
+	Development proposals would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area.

Notes
UK Indices of Multiple Deprivation (IMD) available from MHCLG ¹¹⁵ . It should be noted that there is a degree of uncertainty in regard to the impacts of each site on deprivation and equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

¹¹⁵ Ministry of Housing, Communities and Local Government (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714> [Date accessed: 01/12/23]

SA Objective 12: Health

- 3.8.28 **Box 3.12** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.
- 3.8.29 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the Local Plan should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure facilities and a diverse range of accessible natural habitats and the surrounding PRow network.
- 3.8.30 It should be noted that healthcare capacity information has not been available; the assessment is based on accessibility alone.

Box 3.13: SA Objective 12: Health strategic assessment methodology

Score	Likely impact – NHS hospital
-	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.
+	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.
Notes	
NHS hospital department data available from the NHS website ¹¹⁶ , and local hospital data provided by CWC. The target distance of 5km to an NHS hospital with and A&E service has been used in line with Barton et al. sustainable distances ¹¹⁷ .	

Score	Likely impact – pedestrian access to GP surgery
-	Development proposals where the majority of the site is located over a 15-minute walk to a healthcare location.
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute walk to a healthcare location.
Notes	
Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by CWC.	

Score	Likely impact – public transport access to GP surgery
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to a healthcare location.

¹¹⁶ NHS (2023) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date accessed: 01/12/23]

¹¹⁷ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Score	Likely impact – public transport access to GP surgery
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to a healthcare location.
Notes	
Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by CWC.	

Score	Likely impact – access to / net loss of greenspace
-	Development proposals which coincide with greenspace. Development proposals where the majority of the site is located over 600m from greenspace.
0	Development proposals do not coincide with greenspace.
+	Development proposals where the majority of the site is located within 600m of a greenspace.
Notes	
Assessment of proximity to/net loss of greenspaces based on Ordnance Survey Open Greenspaces ¹¹⁸ . It is assumed that these greenspaces are publicly accessible. The target distance of 600m to a public greenspace has been used in line with Barton et al. sustainable distances ¹¹⁹ .	

Score	Likely impact – access to PRoW / cycle routes
-	Development proposals where the majority of the site is located over 600m from a PRoW and cycle route.
+	Development proposals where the majority of the site is located within 600m from a PRoW and/or cycle route.
Notes	
PRoW data provided by CWC. Strategic cycle route data available from Transport for West Midlands ¹²⁰ . The target distance of 600m to a footpath or cycle path has been used in line with Barton <i>et al.</i> sustainable distances.	

¹¹⁸ Ordnance Survey (2023) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 01/12/23]

¹¹⁹ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

¹²⁰ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 01/12/23]

SA Objective 13: Economy

3.8.31 **Box 3.13** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

Box 3.14: SA Objective 13: Economy strategic assessment methodology

Score	Likely impact – pedestrian access to employment opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute walk to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 25-minute walk but within a 30-minute walk to a key employment location.
++	Residential development proposals where the majority of the site is located within a 25-minute walk to a key employment location

Notes

Data on key employment locations and accessibility modelling (travel time to employment) provided by CWC.

Score	Likely impact – public transport access to employment opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute travel time via public transport to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 25-minute travel time but within a 30-minute travel time via public transport to a key employment location.

Notes

Data on key employment locations and accessibility modelling (travel time to employment) provided by CWC.

Score	Likely impact – employment floorspace
--	Development proposals which result in a significant net decrease in employment floorspace.
-	Development proposals which result in a minor net decrease in employment floorspace.
0	Development proposals would not impact employment floorspace.
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace.
+	Development proposals which result in a minor net increase in employment floorspace.
++	Development proposals which result in a significant net increase in employment floorspace.

Notes

Assessment of current land use has been made through reference to aerial photography and the use of Google Maps¹²¹.

SA Objective 14: Education, skills and training

3.8.32 **Box 3.14** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

Box 3.15: SA Objective 14: Education, skills and training strategic assessment methodology

Score	Likely impact – pedestrian access to primary school
-	Residential development proposals where the majority of the site is located over a 15-minute walk to a primary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a primary school.
++	Residential development proposals where the majority of the site is located within a 10-minute walk to a primary school.

Notes

Data on primary school locations and accessibility modelling (travel time to primary schools) provided by CWC.

Score	Likely impact – pedestrian access to secondary school
-	Residential development proposals where the majority of the site is located over a 25-minute walk to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 20-minute walk but within a 25-minute walk to a secondary school.
++	Residential development proposals where the majority of the site is located within a 20-minute walk to a secondary school.

Notes

Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by CWC.

Score	Likely impact – public transport access to secondary school
-	Residential development proposals where the majority of the site is located over a 25-minute travel time via public transport to a secondary school.
0	Development proposals for non-residential use.

¹²¹ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

Score	Likely impact – public transport access to secondary school
+	Residential development proposals where the majority of the site is located over a 20-minute travel time via public transport but within a 25-minute travel time via public transport to a secondary school.
++	Residential development proposals where the majority of the site is located within a 20-minute travel time via public transport to a secondary school.
Notes	
Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by CWC.	

4 Housing growth options

4.1 Preface

- 4.1.1 Paragraph 61 of the NPPF¹²² states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in PPG¹²³, unless the local authority feel that circumstances warrant an alternative approach.
- 4.1.2 The NPPF also states that “*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”.
- 4.1.3 In April 2022, the housing need figure for Wolverhampton was 1,086 homes per year, according to the national standard method including a 35% uplift which applies to the 20 largest towns and cities. This means that the housing need which the WLP must seek to meet for the Plan period (2022-2042) is 21,720 homes.
- 4.1.4 The 2022 Wolverhampton SHLAA¹²⁴ estimates the current supply of housing land in the Wolverhampton urban area up to 2042. This supply takes into account all identified sites which are currently suitable and deliverable for housing, and also reasonable windfall allowances. The total identified urban housing supply is 9,722 homes, leaving a significant unmet housing need for the Plan period of 11,998 homes.
- 4.1.5 Three options for housing growth have been identified by CWC (see **Table 4.1**). These options include overall housing quanta, and broad direction of growth i.e. the proportion of the housing to be met within Wolverhampton’s urban area and met through exporting through the DtC. In light of the government’s changes to national planning policy¹²⁵, CWC have taken the decision to not review the Green Belt and as such distribution of growth within the Green Belt is not considered to be a reasonable alternative.

¹²² DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/23]

¹²³ DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 01/12/23]

¹²⁴ City of Wolverhampton Council (2022) Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) Final Report: Update as of April 2022. Published: September 2023. Available at: <https://www.wolverhampton.gov.uk/planning/planning-policies/housing-site-information> [Date accessed: 04/12/23]

¹²⁵ Paragraph 145 of the NPPF (December 2023) states that “*Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated*”

Table 4.1: Wolverhampton 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: <ul style="list-style-type: none"> Around 9,722* homes on existing supply in urban area 	<ul style="list-style-type: none"> Shortfall of 11,998* homes against housing need 2022*-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: <ul style="list-style-type: none"> Around 9,722* homes on existing supply in urban area 61 homes on one new allocation (following discount) 524* homes from density uplift and structural change in Wolverhampton City Centre 	<ul style="list-style-type: none"> Shortfall of 11,413* homes against housing need 2022*-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: <ul style="list-style-type: none"> Around 9,722* homes on existing supply in urban area 61 homes on one new allocation (following discount) Around 524* homes from density uplift and structural change in Centres Around 11,413* homes exported through Duty to Cooperate 	<ul style="list-style-type: none"> All of housing need 2022*-42 met Highly sustainable pattern of development Sufficient existing and potential offers from neighbouring authorities which have a strong relationship with Wolverhampton

** subject to amendment at Regulation 19 / Regulation 22 stage due to annual changes in housing need and supply*

4.1.6 **Table 4.2** summarises the likely impacts of each housing growth option in relation to the 14 SA Objectives. The text within **sections 4.2 – 4.15** sets out the accompanying assessment narrative which explains how each overall impact was identified.

4.1.7 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the CWC, as well as expert judgement.

4.2 SA Objective 1 – Cultural heritage

4.2.1 The majority of cultural heritage assets within the WLP area are concentrated in the city centre, particularly listed buildings and conservation areas. Many of Wolverhampton’s remaining open spaces are also of historic importance, such as conservation areas and areas noted within the HLC as AHHLV/AHHTV, including historic field systems and parklands.

- 4.2.2 All three housing growth options propose to deliver around 9,722 homes in the urban area, and as such, it is likely that a large proportion of housing growth would be located in proximity to designated heritage assets, with potential to adversely affect the historic significance of assets and their settings. Options H2 and H3 seek to increase density within Centres, which could potentially place pressure on the historic environment to a greater extent than Option H1. On the other hand, by encouraging growth within these areas, development could also help to promote regeneration, and enhance the cultural heritage value and appreciation of historic features.
- 4.2.3 Overall, as the location, site context and proximity to receptors of the proposed housing growth is unknown, the potential impacts of all the housing growth options on cultural heritage features is uncertain.

4.3 SA Objective 2 – Landscape

- 4.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. According to the Landscape Sensitivity Assessment, the northern and southern Green Belt parcels, and a small section to the south west, are the most sensitive in Wolverhampton, identified as 'moderate-high' sensitivity. According to the Green Belt Study, development in these areas would also lead to 'very high' harm to the purposes of the Green Belt. Although Green Belt is not necessarily an indicator of higher quality landscapes, within Wolverhampton this is generally the case. All three options would protect Green Belt land from development and would focus the majority of growth within the existing urban area.
- 4.3.2 Similarly to the assessment under SA Objective 1, development within urban areas could lead to positive or negative effects on landscape character. All options include at least 9,722 homes within the urban area, with Options H2 and H3 also delivering approximately 524 homes through density uplift in Centres. Adverse effects could arise on existing townscapes through increased density, loss of open space and changes to local landscape character, distinctiveness and views. Conversely, development could also potentially provide opportunities to enhance the character and appearance of the local area and promote regeneration and investment.
- 4.3.3 Overall, as the location, site context and proximity to receptors of the proposed housing provision is unknown, the potential impacts of all the housing growth options on landscape is uncertain.

4.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

- 4.4.1 Wolverhampton's biodiversity assets include LNRs, SINC and SLINC which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands, for example. Undesignated aspects of Wolverhampton's GI network are also likely to serve as important corridors between habitats, facilitating movement of species and linking to the wider countryside including the Green Belt, which supports various elements of the GI network, including habitats and ecological networks such as hedgerows, remnant woodland, trees and green/blue corridors.

- 4.4.2 The proposed development under any of the housing options may have the potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.
- 4.4.3 All three options seek to focus housing growth in the existing urban area, with no Green Belt release. The options may therefore direct development away from the most sensitive biodiversity features, although it should be noted that urban areas can also support distinctive habitats, species and ecological linkages.
- 4.4.4 It is likely that development under any option would place pressure on biodiversity resources, with adverse impacts at the landscape scale despite any biodiversity net gain (BNG) provisions at the site level, owing to the large quanta of housing proposed. A minor negative impact is therefore identified for Options H1 and H2 and a major negative impact is identified for H3 that proposes significantly larger housing growth and therefore increased pressure on biodiversity.

4.5 SA Objective 4 – Climate change mitigation

- 4.5.1 The majority of Wolverhampton's CO₂ emissions are attributed to domestic and transport sources¹²⁶. The lowest number of dwellings is proposed under Option H1, and as such, this option would be likely to lead to the lowest impact with regard to GHG emissions. This option would also focus all development within Wolverhampton's existing urban areas, in proximity to a range of existing jobs, services, facilities and sustainable transport infrastructure. As such, Option H1 would be likely to perform best with regard to climate change mitigation.
- 4.5.2 In contrast, Option H3 proposes the highest number of dwellings (21,720 homes). Option H3 would lead to greater increase CO₂ and other GHG emissions, as a consequence of the construction and occupation of dwellings. However, Options H2 and H3 would also provide development at a higher density within Centres, which are likely to be highly sustainable locations for growth in terms of accessibility to services and public transport infrastructure.
- 4.5.3 Overall, all housing growth options propose a large quantum of growth, which would be likely to increase CO₂ and other GHG emissions, to some extent, as a consequence of the construction and occupation of dwellings. A minor negative impact is identified for Options H1 and H2 which provide 9,722 and 10,307 homes respectively, and a major negative impact for Option H3 which would provide 21,720 homes in total.
- 4.5.4 The potential of new development under any growth option to draw on renewable or low-carbon energy supplies is not known at this stage of assessment.

¹²⁶ Department for Energy Security & Net Zero (2023). UK local authority greenhouse gas emissions estimates 2021. Available at: <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf> [Date accessed: 06/12/23]

4.6 SA Objective 5 – Climate change adaptation

- 4.6.1 Flood risk within Wolverhampton is generally low, although there are some areas within Flood Zones 2 and 3 associated with the Smestow Brook in the south west, the Staffordshire and Worcestershire Canal in the north, and the River Tame in the east. The north and the south east of the city are also within Indicative Flood Zone 3b, where flood risk could potentially worsen over time.
- 4.6.2 The focus of development under the three options within the existing urban area may help to reduce the proportion of previously undeveloped land required to deliver the housing, which would be less likely to exacerbate local surface water flood risk. However, there may still be an increase in the area or density of built form and thereby the extent of impermeable surfaces, especially if existing open spaces within the city are developed. Open spaces and GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers¹²⁷, and helping to alleviate the 'urban heat island' effect. Loss of GI within the urban area and greater urban density could therefore compromise these functions.
- 4.6.3 Overall, as the location and site context of the proposed housing provision is unknown, the potential impacts of all housing growth options on climate change adaptation is uncertain.

4.7 SA Objective 6 – Natural resources

- 4.7.1 The majority of Wolverhampton's land is classified as 'Urban' ALC. There are some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC.
- 4.7.2 It can be assumed that development focused in the existing urban area would not result in the loss of any BMV land. Development focused within the urban area is also likely to provide opportunities for re-use of previously developed land, helping to promote an efficient use of natural resources. Although the exact location of new housing growth under the three options is unknown, it is likely that any development on previously undeveloped land would be small-scale. Therefore, Options H1 and H2 would likely result in a minor positive impact on natural resources, by promoting an efficient use of land. Whereas Option H3 in addition to the development focused in the existing urban area would export growth through DtC, and the exact location of the growth is uncertain and could potentially result in the loss of undeveloped land.

¹²⁷ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 01/12/23]

4.8 SA Objective 7 – Pollution

- 4.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under any of the housing options would be likely to expose new residents to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- 4.8.2 Soil and water pollution impacts will depend on the nature, scale and location of development. Development under Option H3 would deliver the most housing growth of the three options; therefore, this option could potentially result in the largest impact on pollution due to the greater potential of the worsening of air, soil and water quality.
- 4.8.3 Overall, all housing options would be expected to expose new residents to pollution to some degree, and generate further pollution owing to the large scale of development proposed. A minor negative impact is recorded for Options H1 and H2, and a major negative impact is recorded for Option H3.

4.9 SA Objective 8 – Waste

- 4.9.1 All options for housing growth would be likely to increase household waste production. It is assumed that new residents in the WLP area will have an annual waste production of approximately 409kg per person, in line with the average for England¹²⁸.
- 4.9.2 Option H1 proposes the lowest total housing number (9,722) and so this option could be considered the best performing, followed by H2 (10,307). Option H3 proposes the highest total housing number (21,720) although approximately 11,413 of these homes would be exported through DtC. It can be assumed that the higher the proposed housing number, the higher the number of new residents introduced through each option.
- 4.9.3 Overall, all options would be likely to significantly increase household waste and result in a negative impact on SA Objective 8. When considering the total housing quanta proposed under each option alongside the general national trend of decreased waste over time, a minor negative impact is recorded for Options H1 and H2, and a major negative impact is recorded for Option H3.

4.10 SA Objective 9 – Transport and accessibility

- 4.10.1 All options aim to focus housing growth within Wolverhampton's existing urban areas, where there is the greatest provision of sustainable transport infrastructure, including active travel links and public transport options such as buses, metro and rail. It is anticipated that new residents in the centres would be more likely to choose sustainable travel options rather than private car use, compared to more dispersed housing.

¹²⁸ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

4.10.2 It should be noted that there is some uncertainty in this assessment in terms of the effect that high density development within centres proposed under all options could potentially have with regard to capacity issues at transport facilities and traffic congestion; the larger amount of development proposed under Option H3 would be likely to have the greatest potential for adverse effects in this regard. Additionally, there is uncertainty in the assessment of Option H3 as the location of the exported proportion of the housing under the option is unknown. Overall, taking into consideration the potential positive and negative impacts of the proposed growth, Options H1 and H2 would provide a major positive impact on transport and accessibility and Option H3 on balance would provide a minor positive impact.

4.11 SA Objective 10 – Housing

4.11.1 Option H3 would be expected to meet the identified housing requirement of 21,720 homes, and therefore, have a major positive impact on housing provision. Whereas, Options H1 and H2 would not deliver enough housing to meet the identified need, with a shortfall of approximately 11,998 and 11,413 homes predicted under Options H1 and H2, respectively. A minor positive impact on housing provision is identified for Options H1 and H2.

4.11.2 The capacity of Wolverhampton’s urban area has been informed through the SHLAA (2022) and emerging Urban Capacity Review. These aspects need to be closely considered as, without careful planning, development solely focused in urban areas could have adverse impacts on loss of employment opportunities, access to greenspaces for health and wellbeing and the capacity of social infrastructure such as education and health facilities to accommodate growth.

4.11.3 At this scale of assessment, the likely contribution of each housing growth option to meeting the different needs of the population is uncertain, such as housing mix, and provision of extra care housing, accessible housing and affordable homes. However, options which would deliver a larger quantum of growth may be more likely to provide a range of homes.

4.12 SA Objective 11 – Equality

4.12.1 According to the IMD, the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area.

4.12.2 Growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing accessibility to key services and employment opportunities; however, this could also lead to exacerbation of existing inequalities by increasing housing density in deprived areas. Increased housing in the urban areas may also lead to greater pressure on existing open spaces and potential conversion of non-residential land uses into residential properties.

- 4.12.3 Option H3 meets the identified housing need for Wolverhampton of 21,720 homes. Option H3 may therefore be more likely to ensure provision of a suitable mix of housing types / tenures and allow greater scope to meet the varying needs of the population, such as provision of affordable homes, compared to Options H1 and H2 which would result in a housing shortfall. By not meeting housing needs, Options H1 and H2 could also put pressure on housing and rental costs, which would be likely to lead to poorer quality accommodation and overcrowding, with adverse implications for health and wellbeing.
- 4.12.4 As the location, site context and proximity to receptors of the proposed housing provision is unknown, there is some uncertainty regarding the potential impacts of all housing growth options on equality. Overall, Options H1 and H2 would be more likely to lead to a minor negative impact on equality, whereas there is greater uncertainty for Option H3 which could lead to positive or adverse effects.
- 4.12.5 At present, there is no evidence to suggest that any of the housing growth options would disproportionately affect any of the protected characteristics¹²⁹ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

4.13 SA Objective 12 – Health

- 4.13.1 The majority of Wolverhampton is well served by healthcare facilities, with New Cross Hospital in the north east of the city, and various GP surgeries distributed across the urban area. The majority of the built-up area has good pedestrian and public transport access to healthcare. Various open spaces, parks and sports facilities can be found throughout the WLP area, providing areas for exercise and recreation, although new development may put pressure on open spaces under any of the proposed housing growth options.
- 4.13.2 All three options direct growth towards the existing urban area where the majority of existing healthcare facilities are concentrated. The three options may therefore result in a large proportion of new residents being located in areas with good sustainable access to these facilities. Although, it should be noted that the high density development in centres proposed within Options H2 and H3 could potentially lead to capacity issues at healthcare facilities. This could also put pressure on urban greenspaces if land is required for development, with potential negative effects on health associated with loss of, or reduced access to, outdoor space for exercise and recreation.
- 4.13.3 Overall, Options H1 and H2 could potentially result in a major positive impact on SA Objective 12 as it would situate the development in sustainable locations. Option H3 includes an element of housing export to neighbouring authorities. This approach may help to alleviate capacity issues at healthcare facilities within Wolverhampton, but it is uncertain where the development would be located in other authorities with respect to healthcare. Overall, on balance Option H3 is identified as having a minor positive impact on health.

¹²⁹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

4.14 SA Objective 13 – Economy

- 4.14.1 The options considered in this assessment focus on housing growth only. It is assumed that future housing development would not result in the loss of existing active employment floorspace.
- 4.14.2 In terms of accessibility of proposed new housing growth to employment opportunities, the majority of the WLP area is likely to provide relatively good connections, according to accessibility modelling data. A range of employment opportunities including retail, commercial and office floorspace can be found in the WLP area, particularly the main centres. The WLP area is also well served by public transport to nearby centres such as Birmingham and the wider Black Country.
- 4.14.3 In general, it is expected that development focused within the existing urban area would provide good access to a range of local employment opportunities as well as sustainable transport options to reach employment further afield.
- 4.14.4 Overall, Options H1 and H2 would be likely to result in a major positive impact as all development would be concentrated in the urban area under this option. Whereas there is uncertainty regarding where the development exported to neighbouring authorities under Option H3 would be and if this development would solely be located in urban areas. Overall, considering similar development in the urban area to Options H1 and H2, Option H3 would be likely to have a minor positive impact on the economy.

4.15 SA Objective 14 – Education, skills and training

- 4.15.1 There are many primary and secondary schools located across Wolverhampton, as well as higher education opportunities at the University of Wolverhampton. The majority of the WLP area has good pedestrian and public transport access to schools according to accessibility modelling data.
- 4.15.2 All three housing options seek to focus growth in the existing urban area, with Options H2 and H3 also proposing increased housing density in accessible locations (i.e. the main centres). This approach would be likely to ensure that the majority of new development is situated in areas with good sustainable access to education; however, it is uncertain whether the associated increase in population density would lead to adverse effects in terms of capacity issues at primary and secondary schools.
- 4.15.3 Overall, Option H1 and H2 could potentially result in a major positive impact on SA Objective 14 as they would be likely to situate development in sustainable locations. Option H3 would also situate development in sustainable locations within Wolverhampton itself, however, Option H3 includes an element of housing export to neighbouring authorities. This approach may help to alleviate capacity issues at schools within Wolverhampton, but it is uncertain where the development would be located in other authorities with respect to schools and training opportunities. On balance, a minor positive impact is identified for Option H3.

4.16 Conclusions

Table 4.2: Impact matrix of the three housing growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H1	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H2	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H3	+/-	+/-	--	--	+/-	+/-	--	--	+	++	+/-	+	+	+

- 4.16.1 Environmental assessment needs to have details of size, nature and location of the proposals in order for impacts to be understood in relation to the environmental baseline. The housing options have only 'nature', in this case housing. The size and location details are not present, beyond the broad direction towards the existing urban area, which means that any attempt to evaluate impacts is necessarily high level with restricted diagnostic conclusions.
- 4.16.2 A larger quantum of housing growth would generally have more potential to lead to adverse effects, particularly on environmentally focused SA Objectives. Options H1 and H2 propose significantly smaller housing numbers at 9,722 and 10,307 respectively, compared to Option H3 which proposes 21,720 homes. Development proposed under Options H1 and H2 would be located wholly within Wolverhampton's urban area. Based on the high-level scoring system, Options H1 and H2 have been identified to score the same overall (as shown within **Table 4.2**), however, as Option H1 provides a lower housing supply than Option H2, it has potential to perform slightly better against environmental SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste). Despite this, Options H1 and H2 would both lead to a significant shortfall against the identified housing need; therefore, minor negative impacts have been identified against SA Objective 11 (equality) and minor positive impacts against SA Objective 10 (housing) due to the likely reduced scope for delivering varied and high-quality homes to meet the needs of the population.
- 4.16.3 On the contrary, Option H3 recorded a major positive impact against SA Objective 10 and a minor positive impact against SA Objective 11, where the proposed development would meet the identified housing need of 21,720. However, major negative impacts were identified for Option H3 for SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste) due to the larger quantum of growth proposed under this option having potential to lead to more adverse effects than Options H1 or H2. Approximately half of the growth proposed under Option H3 (11,413 homes) will be exported to neighboring authorities, which has resulted in uncertainty in the expected impacts for the proposed housing growth since the location would be determined through other authorities' local plans.

4.16.4 Overall, whilst Option H1 can be identified as the best performing within several SA Objectives, the three options would deliver a similar level of growth within Wolverhampton itself and as such there is very little separating the options in terms of effects within the Plan area. Options H2 and H3 both seek to deliver the same amount of increased growth in accessible locations and maximise opportunities for sustainable urban growth within Wolverhampton. In order to meet the identified housing needs, it will be necessary to export a proportion of growth to neighbouring authorities as set out in Option H3; however, this is likely to increase potential for adverse effects when compared to pursuing a lower quantum of growth.

4.17 Selection and rejection

4.17.1 CWC's assessment of the housing growth options is set out in **Table 4.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹³⁰.

4.17.2 Considering the housing evidence and the SA findings, CWC consider that "*The Preferred Option H3 is the only one of the three growth options which has the potential to meet housing need for Wolverhampton and meet national guidance on sustainable development*".

¹³⁰ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

5 Gypsy and traveller growth options

5.1 Preface

- 5.1.1 In accordance with the Planning policy for traveller sites¹³¹, Gypsies and Travellers are defined as *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- 5.1.2 Travelling Showpeople are defined as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*.
- 5.1.3 The Black Country Gypsy and Traveller Accommodation Assessment (GTAA) (2022)¹³² assessed accommodation needs for Gypsies, Travellers and Travelling Showpeople across the WLP area and the wider Black Country.
- 5.1.4 Taking into consideration the updated Plan period for the WLP, the identified 5-year Gypsy and Traveller accommodation need for Wolverhampton up to 2032 is 33 pitches.
- 5.1.5 One site is currently allocated in the Stafford Road AAP¹³³ for 12 pitches at the 'Former Bushbury Reservoir, Showell Road' which CWC are seeking to bring forward through the WLP.
- 5.1.6 Two options for Gypsy and Traveller growth have been identified by CWC (see **Table 5.1**). Both options include provision of 12 Gypsy and Traveller pitches at the carried forward 'Former Bushbury Reservoir, Showell Road' site, and regularising two pitches on the currently unauthorised site located on Wolverhampton Road in Heath Town. Option G2 also considers the potential to export growth through DtC.

¹³¹ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 01/12/23]

¹³² RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Final Report, April 2022.

¹³³ Wolverhampton City Council (2014) Stafford Road Corridor Area Action Plan 2013 – 2026. Available at: https://www.wolverhampton.gov.uk/sites/default/files/2022-02/stafford_road_corridor_aap_adopted_version_0.pdf [Date accessed: 01/12/23]

Table 5.1: *Wolverhampton Gypsy and Traveller pitch options identified by CWC*

Option	Description of option	Assessment of option
Option G1	Make use of existing sites to deliver new gypsy and traveller pitches up to 2032: <ul style="list-style-type: none"> • 2 pitches regularised on currently unauthorised site • 12 pitches on existing allocated site 	<ul style="list-style-type: none"> • 19 pitch shortfall against Wolverhampton gypsy and traveller pitch need up to 2032
Option G2	Make use of existing and potential new sites to deliver new gypsy and traveller pitches up to 2032: <ul style="list-style-type: none"> • 2 pitches regularised on currently unauthorised site • 12 pitches on existing allocated site • 19 pitches exported through Duty to Cooperate 	<ul style="list-style-type: none"> • No shortfall against Wolverhampton gypsy and traveller pitch need up to 2032

5.1.7 **Table 5.2** summarises the likely impacts of each Gypsy and Traveller growth option in relation to the 14 SA Objectives. The text within **sections 5.2 – 5.15** sets out the accompanying assessment narrative which explains how each overall impact was identified.

5.2 SA Objective 1 – Cultural heritage

5.2.1 The existing allocated site for Gypsy and Traveller use in Wolverhampton at 'Former Bushbury Reservoir, Showell Road' is situated approximately 410m from 'Wolverhampton Locks' CA, and within 500m from several Grade II Listed Buildings along the canal including 'Birmingham Canal No 14 Lock' and 'Viaduct on Stour Valley Line'. The closest heritage asset to the existing unauthorised site is the Grade II Listed Building 'Heath Town Public Baths and Library', situated approximately 130m from the site. The sites are surrounded by built form, and as the proposal is for small-scale Gypsy and Traveller pitches, the proposed development at these locations would be unlikely to significantly affect the setting of nearby heritage assets. Under either growth option, the proposed development would be expected to result in a negligible impact on cultural heritage. There is however greater uncertainty for Option G2 in terms of the location of the 19 pitches proposed to be exported through DtC, the potential effects of which on cultural heritage would need to be explored through the relevant authorities' local plan.

5.3 SA Objective 2 – Landscape

5.3.1 Both proposed Gypsy and Traveller sites are located within the urban area of Wolverhampton, outside of the study area for the Black Country Landscape Sensitivity Assessment. The existing urban area is generally not expected to be sensitive to development, although it should be noted that the study was designed to consider sensitivity of land parcels to housing and employment development (see paras 3.28-3.31 of the Landscape Sensitivity Assessment¹³⁴), rather than Gypsy and Traveller pitches.

¹³⁴ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 01/12/23]

5.3.2 The introduction of a total of 14 pitches under Option G1, and 33 pitches under Option G2, would be unlikely to significantly change the landscape character, but at the local scale may have a minor adverse impact as a result of the introduction of hardstanding and buildings on the currently undeveloped former reservoir site. The location of exported growth under Option G2 is unknown and as such there is some uncertainty in the overall effect on landscape.

5.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

5.4.1 The existing allocated site, referred to in both Options G1 and G2, coincides with 'Bushbury Junction Reservoir' SLINC; however, it is understood that this reservoir has since been landfilled. It is unknown whether this site is still of any importance for biodiversity; therefore, the impact of the proposed development at this site is uncertain. The status of the SLINC and any ecological value should be confirmed via site surveys.

5.4.2 Various other biodiversity designations are located in proximity to the Gypsy and Traveller sites, including the emerging 'Wyrley and Essington Canal' LNR located approximately 50m from the existing unauthorised site.

5.4.3 There is potential for a minor negative impact to occur on these local designations, depending on site-specific requirements including potential BNG requirements which may mitigate these effects to some extent. At this stage of the assessment process, a minor negative impact on biodiversity, flora, fauna and geodiversity cannot be ruled out for both options.

5.4.4 The proposed development under either option may also have the potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.

5.5 SA Objective 4 – Climate change mitigation

5.5.1 Both proposed options for Gypsy and Traveller growth relate to small-scale sites. The existing allocation is located along Showell Road in Bushbury. The existing unauthorised site is located on Wolverhampton Road in Heath Town. These local areas have relatively good transport connections, with public transport being a viable option for travel and the sites being well located with respect to many services and facilities to meet day to day needs. This may present positive effects with regard to climate change mitigation, by reducing the need to travel and facilitating more sustainable travel choices.

- 5.5.2 The majority of Wolverhampton's CO₂ emissions are attributed to domestic and transport sources, according to the government published estimates¹³⁵; however, the proportion of this which can be attributed to Gypsies and Travellers is uncertain, as it is unknown how the average emissions from a Gypsy and Traveller household compares to that of a 'brick and mortar' dwelling. The nature and design of the proposed pitches that would be developed is unknown at the time of writing. Therefore, potential increases in carbon emissions as a result of the construction and occupation of Gypsy and Traveller pitches under Options G1 or G2 are uncertain.
- 5.5.3 Option G2 proposes a slightly higher total provision of pitches (19 more) than G1, and so it could be assumed that this option would present a slightly higher potential for adverse effects in terms of climate change mitigation although the location of this exported growth is unknown.

5.6 SA Objective 5 – Climate change adaptation

- 5.6.1 The proposed Gypsy and Traveller development within Wolverhampton under both Options G1 and G2 would locate new residents in Flood Zone 1, away from risk of fluvial flooding. However, a large proportion of the existing allocation at 'Former Bushbury Reservoir, Showell Road' is located in areas at risk of surface water flooding. Without mitigation, both options could lead to a significant adverse effect on climate change adaptation, although the scale of this impact would be relatively small. Overall, a minor negative impact is identified for both options, with greater uncertainty for Option G2 in terms of the location of exported growth with respect to flood risk. It is likely that there would be scope to incorporate SUDS, to reduce or mitigate adverse effects associated with flood risk to some extent.

5.7 SA Objective 6 – Natural resources

- 5.7.1 The proposed Gypsy and Traveller development under both growth options would situate all pitches within Wolverhampton upon land classed as 'Urban' ALC. Therefore, the proposed development would help to prevent the loss of BMV land across the Plan area. However, the existing allocated site at 'Former Bushbury Reservoir, Showell Road' currently comprises scrub and trees on the former reservoir site with potential environmental value, that may be lost or fragmented if developed. Both options propose the development of 12 Gypsy and Traveller pitches at this location which would be likely to involve creating new areas of hardstanding and new infrastructure such as access roads. Overall, Options G1 and G2 would both be expected to have a minor negative impact on natural resources. As Option G2 proposes a higher total number of pitches, to be exported to neighbouring authorities, this option could potentially place greater pressure on undeveloped land and soil resources, although the specific location of exported growth is unknown.

¹³⁵ Department for Energy Security & Net Zero (2023). UK local authority greenhouse gas emissions estimates 2021. Available at: <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf> [Date accessed: 06/12/23]

5.8 SA Objective 7 – Pollution

- 5.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under either option would be likely to expose new residents to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- 5.8.2 The existing allocation and the existing unauthorised site are located in close proximity to railway lines, meaning that current and future residents may be exposed to higher levels of noise pollution and vibrations. The unauthorised site is also adjacent to the A4124, and therefore, the proposed development at this site could potentially expose site end users to higher levels of transport associated air and noise pollution.
- 5.8.3 New development may also lead to increased soil and water pollution, as a result of construction and occupation of the development. This will depend on the nature and scale of the proposed Gypsy and Traveller pitches, such as the extent of new hardstanding, and any utilities infrastructure that is introduced.
- 5.8.4 Overall, both Gypsy and Traveller growth options would be expected to expose new residents to pollution and may generate further pollution to some degree. A minor negative impact is therefore identified for both options.

5.9 SA Objective 8 – Waste

- 5.9.1 It is assumed that new residents in the WLP area will have an annual waste production of approximately 409kg per person, in line with the average for England¹³⁶. Waste may also be produced during the construction of the sites.
- 5.9.2 There is a degree of uncertainty in this assessment, as it is unknown how the average waste production from a Gypsy and Traveller household compares to that of a 'brick and mortar' dwelling, although it is likely that both options for Gypsy and Traveller growth would increase household waste production, to some extent. A minor negative impact could occur as a result of both options.
- 5.9.3 Option G2 proposes a slightly higher total provision of pitches than G1, and so it is assumed that this option would present a slightly higher potential for adverse effects in terms of waste generation.

¹³⁶ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

5.10 SA Objective 9 – Transport and accessibility

- 5.10.1 The proposed Gypsy and Traveller options would situate new residents in areas with good access to public transport options, including bus services. The existing unauthorised site, and a proportion of the existing allocated site, lie within the sustainable target distance of 2km from Wolverhampton Station.
- 5.10.2 The development at both sites would also be expected to have relatively good access to the pedestrian and cycle networks. Both sites are located within 600m of a PRoW, and the existing allocated site ('Former Bushbury Reservoir, Showell Road') is located within 600m of the cycle network, facilitating active travel. The existing allocated site lies within a 10-minute travel time to local services via public transport, according to accessibility modelling data. Although, the data indicates that the allocated site lies just outside of the 15-minute walking distance to local services, and so residents may be less likely to choose to walk to these services from this proposed site. The existing unauthorised site is located within a 10-minute travel time to local services via public transport, and a 10-minute walking distance to local services, according to accessibility modelling data.
- 5.10.3 Overall, both Gypsy and Traveller growth options would be likely to provide relatively good access to sustainable travel options and may serve to encourage local journeys via active travel, owing to the location of the sites with respect to existing facilities and employment opportunities. A minor positive impact could be expected under either option with regard to transport and accessibility.

5.11 SA Objective 10 – Housing

- 5.11.1 Option G2 would seek to meet the identified Gypsy and Traveller 5-year accommodation need of 33 pitches, and would therefore be expected to result in a major positive impact on housing provision by meeting the needs for this community. Option G1 does not meet the identified Gypsy and Traveller pitch requirements for Wolverhampton, with a 19-pitch shortfall. Option G1 would nevertheless provide 14 pitches and therefore a minor positive impact on housing provision for the needs of this community is identified.

5.12 SA Objective 11 – Equality

- 5.12.1 Both proposed Gypsy and Traveller sites included within the growth options are situated within LSOAs that fall within the 10% most deprived in England, according to the IMD. Directing Gypsy and Traveller growth to these areas could potentially result in positive effects on equality, in terms of helping to facilitate social inclusion, providing accommodation to contribute towards meeting the identified needs, and ensuring that the development is situated in areas with good connectivity to local services, facilities and employment opportunities. On the other hand, increasing provision of pitches in these areas could also lead to exacerbation of existing inequalities by increasing the local population density.
- 5.12.2 The overall effect of both Options G1 and G2 on SA Objective 11 is therefore uncertain, although Option G2 may be expected to perform slightly better than G1 owing to the proposed development meeting the identified need of Wolverhampton's Gypsy and Traveller pitches.

5.12.3 Race is a protected characteristic under the Equality Act. The growth options seek to contribute towards the identified accommodation requirements for Gypsies and Travellers which would be likely to have a positive impact on meeting the accommodation needs of this ethnic group.

5.12.4 At present, there is no evidence to suggest that either of the Gypsy and Traveller growth options would disproportionately affect any of the other protected characteristics¹³⁷ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

5.13 SA Objective 12 – Health

5.13.1 Both the existing allocated site and the unauthorised site are located within a sustainable distance to healthcare facilities, including within a 15-minute walking distance to a GP surgery, and within 5km of New Cross Hospital. The proposed development under either growth option would be likely to facilitate good access to healthcare.

5.13.2 There are a range of public open spaces in proximity to the existing allocated site, including the Fowler Playing Fields to the south. The existing unauthorised site is near to greenspaces such as Heath Town Park, which is located approximately 100m from the site. Both options would be expected to provide new residents with access to outdoor space for exercise and recreation, with associated positive effects on health and wellbeing.

5.13.3 Overall, the proposed development under both Options G1 and G2 could result in a minor positive impact in terms of access to healthcare and recreational facilities.

5.14 SA Objective 13 – Economy

5.14.1 All existing and proposed Gypsy and Traveller sites are located in areas with good sustainable access to employment. The existing allocated site is situated adjacent to several businesses, including those within the Showell Road Industrial Estate. Various employment opportunities can be found in Heath Town Centre, close to the existing unauthorised site. According to accessibility modelling data, both sites are located within a 20-minute walk and public transport journey to an employment location. The development proposed under both options would be likely to ensure that the Gypsy and Traveller community would have good sustainable access to employment opportunities, resulting in a major positive impact on SA Objective 13. The location of exported growth under Option G2 is unknown and as such there is some uncertainty in the overall effect in terms of sustainable access to employment.

¹³⁷ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

5.15 SA Objective 14 – Education, skills and training

5.15.1 The existing allocated site is located in an area with good sustainable access to primary and secondary schools. According to accessibility modelling data, the existing allocated site is largely located within a 15-minute walk to a primary school, with a proportion within a 10-minute walk, and the unauthorised site is located wholly within a 10-minute walk to a primary school. The existing unauthorised site is also within a 20-minute walk to a secondary school, and the existing allocated site within a 25-minute walk. Both sites are within a 20-minute public transport journey to a secondary school. The development proposed under both options would be likely to ensure that the Gypsy and Traveller community would have good sustainable access to education, skills and training, resulting in a minor positive impact on SA Objective 14.

5.16 Conclusions

Table 5.2: Impact matrix of the two Gypsy and Traveller growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Gypsy and Traveller Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
G1	0	-	-	+/-	-	-	-	-	+	+	+/-	+	++	+
G2	0	-	-	+/-	-	-	-	-	+	++	+/-	+	++	+

5.16.1 As both proposed options for Gypsy and Traveller growth relate to the same two sites within Wolverhampton itself, Options G1 and G2 perform similarly overall as shown in **Table 5.2**. However, across several objectives the two options do perform slightly differently as Option G1 does not meet the identified Gypsy and Traveller need whereas Option G2 does, through exporting a proportion of growth to neighbouring authorities.

5.16.2 Both options would give rise to potential adverse effects in terms of the local landscape character (SA Objective 2), biodiversity (SA Objective 3), climate change mitigation (SA Objective 5), natural resources (SA Objective 6), pollution (SA Objective 7), and waste (SA Objective 8). Negative impacts could also be expected in regard to the surface water flood risk (SA Objective 4) present on the existing allocated site, without intervention.

5.16.3 There is some uncertainty regarding the effects of the proposed development on climate change mitigation (SA Objective 4) owing to uncertainty in the scale and nature of development involved, and in terms of equality (SA Objective 11) which is difficult to determine without further site-specific information.

5.16.4 Overall, the proposed introduction of a total of 14 pitches under Option G1, and 33 pitches under Option G2, means that Option G2 would be likely to have a major positive impact against SA Objective 10 (housing) in comparison to Option G1 which is identified as having a minor positive impact. Option G2 would be the favourable option of the two as it would meet the identified 5-year supply of Gypsy and Traveller pitches for Wolverhampton; however, this option is reliant upon exporting 19 pitches to neighbouring authorities. The exported growth of small-scale Gypsy and Traveller pitches would be unlikely to cause significant adverse effects, although uncertainty remains on the likely effects of exported pitches.

5.17 Selection and rejection

5.17.1 CWC's assessment of the Gypsy and Traveller growth options is set out in **Table 5.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹³⁸.

5.17.2 Considering the pitch need evidence and the SA findings, CWC consider that "*The Preferred Option G2 is the only one of the two options which has the potential to provide the required 5 year supply of gypsy and traveller pitches for Wolverhampton and also meet national guidance on sustainable development*".

¹³⁸ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

6 Employment growth options

6.1 Preface

6.1.1 Wolverhampton is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Dudley, Sandwell and Walsall. The Black Country Economic Development Needs Assessment (EDNA) update (2023)¹³⁹ identifies a need for an additional 533ha of land for employment development for the period 2020/2021 up to 2040/2041 across the FEMA as a whole, including a total need of 116ha for Wolverhampton.

6.1.2 Taking into account completions since April 2020, current Local Plan allocations proposed to be carried forward into the WLP and other sites with planning permission for employment development, Wolverhampton's employment land supply as of April 2022 is 47.4ha.

6.1.3 Three options for employment growth have been identified by CWC (see **Table 6.1**). These options include distributions of employment land across existing allocations taking into account the 47.4ha baseline supply figure, proposed new sites, and potential to export growth through the DtC.

Table 6.1: *Wolverhampton employment growth options identified by CWC*

Option	Description of employment option	Assessment of option
Option E1	Carry forward existing employment allocations: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area (including completions since 2020). 	<ul style="list-style-type: none"> Shortfall of 68.6 ha against employment land need for Wolverhampton up to 2041 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E2	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area 15.3 ha on new allocations 	<ul style="list-style-type: none"> Shortfall of 53.3 ha against employment land need for Wolverhampton up to 2041 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E3	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access, and export remaining employment land need to neighbouring authorities: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area 15.3 ha on new allocations 	<ul style="list-style-type: none"> All of employment land need for Wolverhampton up to 2041 met. Sufficient offers from neighbouring authorities which have a strong relationship with Wolverhampton Contributions from neighbouring areas are available to address employment land need across the Black Country FEMA as a whole.

¹³⁹ Black Country Authorities. Employment Land Needs Assessment 2020 to 2041. Available at: <https://www.dudley.gov.uk/media/scfdohle/black-country-employment-land-needs-assessment-edna-2023.pdf> [Date accessed: 07/12/23]

Option	Description of employment option	Assessment of option
	<ul style="list-style-type: none"> 53.3 ha exported through Duty to Cooperate 	<ul style="list-style-type: none"> Sustainable pattern of development

6.2 SA Objective 1 – Cultural heritage

6.2.1 The majority of cultural heritage assets within the WLP area are concentrated in the city centre, particularly listed buildings and conservation areas. All three employment options would focus growth within the existing urban areas, amongst existing employment areas. These are generally clustered in the centre, east and north of the WLP area. It is therefore likely that a large proportion of employment growth would be located in proximity to designated heritage assets, with potential to adversely affect the historic significance of these assets and their settings. Employment floorspace could include large buildings and potentially high-rise development, which may also have potential to affect views of or from heritage assets in the city.

6.2.2 Under Options E2 and E3 the "new allocations" have been assessed as reasonable alternative sites within the SA, presented in **Appendix C**. Of the four allocations, two sites were identified to have potential to negatively impact conservation areas and archaeological priority areas (pre-mitigation). However, as a whole, due to the focus of new growth within areas that area already characterised by employment land uses, the new development under the options is likely to be in keeping with the existing built form and may also help to promote regeneration with benefits to areas with historic interest or architecture. All three options could therefore give rise to positive or negative effects, depending on the specific proposal and location. Furthermore, under Option E3 more uncertainty is present where a large proportion of growth would be exported to neighbouring authorities, the specific location of which is unknown.

6.2.3 Overall, as the specific site context and proximity to receptors of the proposed employment provision are unknown, the potential impacts of all three employment growth options on cultural heritage features are uncertain.

6.3 SA Objective 2 – Landscape

6.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. None of the employment growth options seek to release Green Belt land for development, and so it is likely that development would avoid sensitive areas as identified in the Landscape Sensitivity Assessment.

6.3.2 Development within the existing urban areas could lead to positive or negative effects on the landscape / townscape character. Adverse effects could arise on existing townscapes through increased density, loss of open space and changes to local character, distinctiveness and views. Conversely, development could also potentially provide opportunities to enhance the character and appearance of the local area and promote regeneration and investment.

6.3.3 Options E1 and E2 propose to incorporate all employment growth within Wolverhampton rather than exporting a proportion to neighbouring authorities as under Option E3. Impacts under Option E3 would be more uncertain than options E1 and E2 due to the exported growth. However, as all options propose the same scale of development within Wolverhampton, and as the specific site context and proximity to receptors of the proposed employment provision are unknown, the potential impacts of all three options on landscape are uncertain.

6.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

6.4.1 Wolverhampton's biodiversity assets include LNRs, SINCs and SLINCs which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands, for example. Undesignated aspects of the WLP area's GI network are also likely to serve as important corridors between habitats, facilitating movement of species.

6.4.2 None of the employment growth options seek to release Green Belt land for development, and so it is likely that the majority of development would be directed away from areas of previously undeveloped land where habitats and ecological networks are most prevalent. Although, urban areas can also support distinctive habitats, species and ecological linkages and there may be some loss of previously undeveloped land or brownfield land with ecological value within the city. Several of Wolverhampton's employment sites are situated along the canal network which includes locally designated biodiversity assets, including the 'Birmingham Canal, Wolverhampton Level' SINC which is noted as supporting a wide range of habitat types and associated species, including in parts a diverse and abundant aquatic flora. Increasing or intensifying employment uses in proximity to the canal network may therefore increase the risk of water pollution and other development related threats and pressures to local biodiversity features.

6.4.3 Under Options E2 and E3 "*new allocations*" will provide employment land, and have been assessed in the SA as reasonable alternative sites (presented in **Appendix C**). Of the four sites, one site partially coincides with the 'Birmingham Canal, Wolverhampton Level' SINC and one site wholly coincides with the 'Neachells Lane Open Space' SLINC. Development proposed under the options as a whole could potentially lead to minor negative impacts on these local designations, depending on site-specific requirements including potential for BNG which may mitigate these effects to some extent. At this stage of the assessment process, a minor negative impact on biodiversity, flora, fauna and geodiversity cannot be ruled out for all three employment growth options. There is greater uncertainty regarding the effect of Option E3 than the other two, given the unknown location of exported growth.

6.4.4 The proposed development under these three employment options may have the potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.

6.5 SA Objective 4 – Climate change mitigation

- 6.5.1 Owing to the focus of employment development under all three options towards the urbanised areas of Wolverhampton and where existing employment provisions are concentrated, it is likely that these areas will be accessible via sustainable transport methods and close to strategic transport routes. This may help to reduce the number of car journeys required for employees travelling to work, and reduce journey times.
- 6.5.2 However, all three options propose to deliver a large amount of new employment land, including 47.4ha under Option E1, 62.7ha under Option E2, and 116ha under Option E3. All options have potential to result in increased GHG emissions during construction and occupation, potentially including more HGV journeys; although, the emissions likely to be generated as a result of the development would be dependent on the nature and scale of the employment land proposed, and the potential for low- or zero-carbon and renewable energy schemes to be incorporated, which is unknown at present. Option E3 would also export 53.3ha of the total 116ha supply to neighbouring authorities, resulting in greater uncertainty surrounding the potential for associated adverse impacts of the proposed development. The overall impact of Options E1, E2 and E3 on climate change mitigation is therefore uncertain.

6.6 SA Objective 5 – Climate change adaptation

- 6.6.1 Flood risk within Wolverhampton is generally low, although there are some areas within Flood Zones 2 and 3 associated with the Smestow Brook in the south west, the Staffordshire and Worcestershire Canal in the north, and the River Tame in the east. The north and the south east of the city are also within Indicative Flood Zone 3b, where flood risk could potentially worsen over time. The majority of the proposed employment growth is expected to be situated away from these areas; however, a proportion of growth is likely to be situated in the employment areas to the south east and northern extents of Wolverhampton where there are some areas within Flood Zones 2 and 3. Depending on the site-specific proposals and land use, employment development may be classed as 'less vulnerable' to fluvial flooding according to the NPPF. However, increasing development or density within areas at risk of flooding can have implications downstream, making it more difficult to adapt to the effects of climate change.

- 6.6.2 The focus of the majority of employment growth within the existing urban area and in some cases on brownfield land would be likely to reduce the proportion of previously undeveloped land required to deliver the development, which would be less likely to exacerbate local surface water flood risk. However, there may still be an increase in the area or density of built form and thereby the extent of impermeable surfaces, especially if existing open spaces within the city are developed. Open spaces and GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers¹⁴⁰, and helping to alleviate the 'urban heat island' effect. Loss of GI within the urban area and greater urban density could therefore compromise these functions.
- 6.6.3 Overall, the precise impacts of development cannot be determined without input from flood risk assessments and knowledge regarding the proposed uses and layout of each employment site. Greater uncertainty arises under Option E3, which would export a proportion of growth to neighbouring authorities, the location of which is unknown. Nevertheless, at this stage of the assessment process, a minor negative impact on climate change adaptation cannot be ruled out for all three options.

6.7 SA Objective 6 – Natural resources

- 6.7.1 The majority of Wolverhampton's land is classified as 'Urban' ALC. There are some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC. It can therefore be assumed that development focused in the existing urban area would not result in the loss of any BMV land.
- 6.7.2 All three options would focus growth within Wolverhampton's urban areas, amongst existing employment land uses. This is likely to include use of previously developed or under-utilised land, and as such, the majority of the proposed development is likely to represent an efficient use of land, with positive effects in terms of the conservation of natural resources. Although, three of the "new allocations" proposed for development under the options contain some areas of previously developed land, that would present a loss of land with environmental value (see **Appendix C**).
- 6.7.3 Under Option E3, 53.3ha of employment land will be exported to neighbouring areas. Whilst the precise location of this growth is unknown, it is likely that the employment land would be located in urban areas, amongst existing employment land uses to promote sustainable development.
- 6.7.4 There may be some loss of previously undeveloped land, or brownfield land with environmental value, within the city as a result of the proposed employment growth under all three options, although this is likely to be relatively small-scale. Overall, all three options would be likely to result in a negligible impact on natural resources.

¹⁴⁰ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 01/12/23]

6.8 SA Objective 7 – Pollution

- 6.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under any of the employment growth options would be likely to expose site end users to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air quality.
- 6.8.2 Soil and water pollution impacts will depend on the nature, scale and location of development. None of the employment growth options seek to release Green Belt land for development. As the employment growth would be focused within the existing urban areas, there is likely to be potential for redevelopment of brownfield sites and more efficient use of land compared to development directed outside of the city. This may also help to ensure existing ground contamination issues are addressed, prior to the development. The employment options may lead to benefits in the sense that new development would be directed away from areas of greenfield land and natural features where there is generally higher potential for worsening of air, soil and water quality.
- 6.8.3 Despite the above considerations, there is still potential for the generation of air, soil and water pollution to some extent, depending on the proposed end uses of the new employment land, as well as potential to exacerbate existing poor air quality within the AQMA. Option E3 proposes significantly larger employment growth, proposing 116ha of employment land in comparison to 47.4ha under E1 and 62.7 under E2; therefore, Option E3 has potential to cause greater pollution related impacts as a result of proposing a larger quantity of development. Overall, a minor negative impact is identified for Options E1 and E2 and a major negative impact is identified for Option E3. Although, there is some uncertainty in this assessment owing to the unknown specific site context and proximity to receptors, and the unknown location of exported growth under Option E3.

6.9 SA Objective 8 – Waste

- 6.9.1 As the proposed employment growth under all options would be focused within the existing urban areas, it is likely that the development will be situated in closer proximity to existing waste management infrastructure. This could potentially help to minimise adverse effects in terms of simplifying the management of waste and reducing travel times; however, employment growth may also result in a greater quantity or range of waste associated with more employment floorspace. Under Option E3, employment land would be exported to neighbouring authorities, therefore, the location of the growth and other authorities' waste infrastructure is unknown. At this stage, the specific site context and nature of the proposed development is unknown, and therefore, the volumes and types of waste likely to be generated is uncertain under all three options.

6.10 SA Objective 9 – Transport and accessibility

- 6.10.1 Options E1 and E2 would focus growth within the existing urban areas, amongst existing employment areas which are generally clustered in the centre, east and north of the WLP area. The majority of Wolverhampton's urban areas are well served by sustainable transport infrastructure including public transport options such as buses, metro and rail. Although, some employment areas such as the eastern and northern extents of the WLP area are situated further from rail or metro links. Option E3 in addition to focusing growth within the existing urban areas within Wolverhampton as per Options E1 and E2, will also export a proportion of growth to neighbouring areas; it is uncertain as to how well the exported growth will be served by sustainable transport infrastructure.
- 6.10.2 Active travel links are also relatively good across the WLP area, although the coverage varies depending on the specific location and may be less well connected in more industrialised areas, compared to residential neighbourhoods. There is also potential for large amounts of employment growth in the urban areas to exacerbate congestion.
- 6.10.3 On balance, the broad location of new employment growth within the city would be likely to provide sustainable travel options for employees travelling to work, with a minor positive impact on transport and accessibility identified for all three options.

6.11 SA Objective 10 – Housing

- 6.11.1 The options considered in this assessment focus on employment growth only. It is assumed that future employment development would not result in the loss of existing housing, or compromise housing delivery. The three options would be expected to result in a negligible impact on housing provision in Wolverhampton.

6.12 SA Objective 11 – Equality

- 6.12.1 According to the IMD, the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area. Employment growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing accessibility to employment opportunities; however, this could also lead to exacerbation of existing inequalities in some instances, for example by leading to densification and greater pressure on existing open spaces to be converted into employment land.
- 6.12.2 Option E3 would meet all of the Black Country FEMA employment land need arising in Wolverhampton between 2020/21 and 2040/41; however, Option E3 would not provide all growth within the WLP area and would instead export 53.3ha of employment land via the DtC, potentially resulting in an increased need to commute to other local authority areas and missing an opportunity to address local unemployment issues. However, under Options E1 and E2 the identified employment need for Wolverhampton would not be met and a shortfall of 68.8ha is expected under Option E1 and a shortfall of 53.3ha is expected under Option E2.

6.12.3 As the specific site context and proximity to receptors of the proposed employment land is unknown at this stage, there is some uncertainty regarding the potential impacts of the three options on equality. Overall, Options E1 and E2 would be more likely to lead to a minor negative impact on equality overall, whereas there is greater uncertainty and potential for positive effects under Option E3.

6.12.4 At present, there is no evidence to suggest that either of the employment growth options would disproportionately affect any of the protected characteristics¹⁴¹ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

6.13 SA Objective 12 – Health

6.13.1 The majority of Wolverhampton is well served by healthcare facilities, with New Cross Hospital in the north east of the city, and various GP surgeries distributed across the urban area. The majority of the built-up area has good pedestrian and public transport access to healthcare. Various open spaces, parks and sports facilities can be found throughout the WLP area, providing areas for exercise and recreation.

6.13.2 Under all three options, development is directed towards the existing urban areas, although under Option E3 53.3ha of development would be exported via the DtC. It is expected that exported development would remain in existing urban areas; however, the specific details of the proposed exported growth is uncertain and will be determined through the relevant authorities' local plans. Development directed towards existing areas under all three options could put pressure on urban greenspaces if land is required for development, with potential adverse effects on health associated with loss of, or reduced access to, outdoor space for exercise and recreation. However, this is likely to be small-scale occurrence, if at all.

6.13.3 The three employment options are not expected to increase the provision of healthcare facilities across the Plan area. It is also assumed that future employment development would not result in the loss of healthcare facilities. As a result, overall, the three options would be likely to have a negligible impact in regard to human health.

6.13.4 It should be noted that there is potential for adverse effects on human health associated with poor air quality; these impacts are addressed within SA Objective 7 – Pollution.

6.14 SA Objective 13 – Economy

6.14.1 Options E1 and E2 would not meet the employment land need for Wolverhampton up to 2041, and additionally would result in a shortfall of employment land across the Black Country FEMA as a whole. Option E1 would result in a 68.6ha shortfall and Option E2 would result in a 53.3ha shortfall. Both options could therefore result in a lack of local employment opportunities and exacerbate unemployment issues.

¹⁴¹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

6.14.2 Option E3 is the only option that meets all of the employment land need for Wolverhampton up to 2041. Option E3 provides 116ha of employment land, with 53.3ha served through the DtC. The contributions from neighbouring areas would address Wolverhampton's employment land need across the Black Country FEMA as a whole. Although there may be need to commute to neighbouring authorities to reach new employment sites, on the whole, under Option E3 residents of Wolverhampton would be likely to have access to a wider range of employment opportunities than Options E1 and E2.

6.14.3 Overall, under the provisions of Options E1 and E2 a minor positive impact would be expected on the economy, and under Option E3 a major positive impact is identified.

6.15 SA Objective 14 – Education, skills and training

6.15.1 The options considered in this assessment focus on employment growth only. It is assumed that future employment development would not affect access to schools. However, as all options seek to provide employment land, this could potentially also include opportunities for skill development and training, for example the provision of apprenticeships. All three options may therefore lead to an indirect minor positive impact on SA Objective 14.

6.16 Conclusions

Table 6.2: Impact matrix of the three employment growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Employment Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
E1	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E2	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E3	+/-	+/-	-	+/-	-	0	--	+/-	+	0	+/-	0	++	+

6.16.1 As Options E1 and E2 have a similar urban focus and both fail to meet the employment land need for Wolverhampton, resulting in 47.4ha and 62.7ha of employment land respectively, the overall identified impacts against the SA Objectives are similar, as shown in **Table 6.2**.

6.16.2 All three options would locate new development in central areas of Wolverhampton where there is generally good access via existing transport infrastructure, however Option E3 is the only option that would satisfy Wolverhampton’s identified employment need (although reliant on DtC to achieve this). As a result, a major positive impact has been identified for Option E3 under SA Objective 14 (economy), and there may be greater potential than the other options to achieve positive impacts on equality (SA Objective 11) due to the employment need being met, although the overall effect is uncertain.

6.16.3 On the other hand, Options E1 and E2 could potentially lead to minor negative impacts on pollution (SA Objective 7), in comparison to a major negative impact identified for Option E3, given that less development would take place in total under Options E1 and E2. However, all options would also give rise to potential adverse effects in terms of increasing threats and pressures to local biodiversity assets (SA Objective 3), including the canal network, as well as potentially locating some employment sites in proximity to areas of flood risk (SA Objective 5).

6.16.4 The options are unlikely to significantly affect natural resources (SA Objective 6), owing to a large proportion of development being located within existing urban areas with potential for efficient use of land including brownfield development, although there is some uncertainty in the location of exported growth under Option E3. There is unlikely to be a significant effect from any employment option on housing provision (SA Objective 10).

6.16.5 The effects of the proposed development under any option on climate change mitigation (SA Objective 4) and waste (SA Objective 8) are uncertain, owing to the unknown scale and nature of employment development involved. Furthermore, without knowledge of the specific site proposals and the nature of the employment land to be delivered, it is difficult to determine overall effects on landscape and townscape character (SA Objective 2) and cultural heritage (SA Objective 1) as the growth could give rise to positive or negative effects depending on these factors.

6.16.6 Overall, whilst Option E1 would deliver the smallest quantum of employment growth and could therefore give rise to the least adverse effects against several SA Objectives, there is very little separating any of the three options in terms of growth within Wolverhampton itself. Given that Option E3 would meet Wolverhampton's employment needs within the FEMA, and is likely to provide a greater range of local employment opportunities, this option could be identified as the best performing of the three; however, CWC would have little control as to the location of exported growth and there may be increased potential for adverse effects on some receptors.

6.17 Selection and rejection

6.17.1 CWC's assessment of the employment growth options is set out in **Table 6.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹⁴².

6.17.2 Considering the employment evidence and the SA findings, CWC consider that "*The Preferred Option E3 is the only one of the three growth options which has the potential to meet employment land needs for Wolverhampton, allow Duty to Cooperate requirements to be met for the Black Country FEMA, and meet national guidance on sustainable development*".

¹⁴² City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

7 Assessment of spatial options

7.1 Preface

7.1.1 The spatial options are intrinsically linked to the housing and employment growth options for Wolverhampton, owing to the finite amount of land available for development. The WLP spatial strategy will dictate broadly where new growth will be located in Wolverhampton for the Plan period to 2042.

7.1.2 As outlined in the Issues and Preferred Options consultation document, within Wolverhampton there are limited options available to address the housing and employment growth requirements. The WLP cannot provide sufficient homes to meet all of the housing need, and so there is a reliance on exporting unmet housing need through the DtC.

7.1.3 Seven options for the spatial strategy have been identified by CWC (see **Table 7.1**). These options incorporate elements of the housing and employment growth options as set out in **Chapter 4** and **6**, but provide more detail regarding options for the broad spatial distribution of growth in Wolverhampton as well as some more thematic approaches for consideration. It should be noted that none of these options alone could deliver the required growth within the Plan area.

Table 7.1: *Wolverhampton spatial options identified by CWC*

Option	Description of spatial option	Impact on growth options
Option A	"Business as Usual" – retain current housing and employment allocations in urban area and protect green belt.	<ul style="list-style-type: none"> As for Option H1 As for Option E1
Option B	Employment-Led - reconfigure uses in the urban area to promote local employment and mixed use; retain and intensify employment land and protect green belt.	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3
Option C	Market-Led – only allocate housing in high demand areas and employment land in most attractive commercial locations	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3 but without sites in less attractive commercial locations and therefore larger shortfall against employment land need
Option D	Garden Village / Health Promotion – protect all publicly accessible open space; provide lower density, mixed use housing developments with more on-site open space and residential services	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3 but with larger shortfall against employment land need
Option E	Minimise Climate Change Impacts – only develop housing in locations with highest sustainable transport access to residential services, and only locate new employment land where good public transport access.	<ul style="list-style-type: none"> As for Options H2 & H3 but with larger shortfall against housing need As for Options E2 & E3 but without sites where not good public transport access and therefore larger shortfall against employment land need

Option	Description of spatial option	Impact on growth options
Option F	Infrastructure and Regeneration-Led – Focus development in the central, north and east urban area of Wolverhampton, where development and infrastructure opportunities are concentrated and regeneration benefits can be maximised.	<ul style="list-style-type: none"> As for Options H2 & H3 but with larger shortfall against housing need As for Options E2 & E3
Option G	Balanced and Sustainable Growth – Focus development in the central, north and east parts of Wolverhampton, to minimise climate change impacts, make best use of existing infrastructure and support urban regeneration. Key features: increased housing density in the most accessible locations; more housing in Wolverhampton City Centre.	<ul style="list-style-type: none"> As for Option H2 & H3 As for Options E2 & E3

7.1.4 Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 7.2**. Full explanations and reasonings behind each overall 'score' outlined in **Table 7.2** are set out per SA Objective in the following sections of this appendix. Best performing options have been identified within each SA Objective.

7.1.5 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the CWC, as well as expert judgement.

7.2 SA Objective 1 – Cultural heritage

7.2.1 Many of the WLP area's heritage assets are concentrated in the city centre, particularly listed buildings and conservation areas, with other heritage assets associated with the canal and railway networks. In some locations to the west and, to a lesser extent, the south of the area, heritage assets are associated with the Green Belt.

7.2.2 Option G seeks to increase density in accessible locations, with more housing in the city centre. Option A proposes to continue the current approach with growth focused in the urban centres. Option E would direct housing to locations with the best sustainable transport access, and Option F would concentrate development in the central, north and east urban area, which may lead to a similar urban focus for development. Options A, E, F and G may therefore lead to more development in proximity to urban heritage assets, which without careful design principles may have potential to alter their historic settings. However, Options F and G also focus on regeneration-led development, which may provide opportunities to enhance historic character and could potentially rejuvenate buildings (such as buildings on the Heritage at Risk register) and areas of cultural heritage interest.

7.2.3 Option B seeks to retain and intensify employment land in Centres, which may lead to higher density development and more employment development in urban areas, placing more pressure on urban heritage assets, but also protecting heritage assets in the Green Belt and urban fringe from adverse effects associated with new development.

- 7.2.4 Many of Wolverhampton's remaining open spaces are also of historic importance, such as conservation areas, RPGs and areas noted within the HLC as AHHLV/AHHTV, including historic field systems and parklands. Option D seeks to protect all publicly accessible open space, which may safeguard heritage assets within these open spaces, and may also help to conserve views and settings of historic features in the urban area. Conversely, the lower density development proposed under Option D may lead to greater land-take overall including use of other non-accessible open spaces, which could still place pressure on heritage assets depending on the specific location.
- 7.2.5 Option C would see a market-led approach, directing new development to areas of most demand. Under this option, there may be greater potential for adverse effects on heritage assets including change of historic character and settings, through introducing new development into currently undeveloped locations.
- 7.2.6 As the specific location, site context and proximity to receptors of the proposed growth is unknown, there is some uncertainty regarding the potential impacts of all spatial options on cultural heritage. All of the proposed spatial options would be expected to result in a proportion of new development being located in proximity to designated heritage assets, with potential to adversely affect the historic significance of assets and their settings.
- 7.2.7 On balance, Options A, B, E, F and G are identified to result in an overall negligible impact on cultural heritage whereas Options C and D are more likely to result in a minor negative impact. Option F could potentially be the best performing option, as it may present the most opportunities for enhancement of the historic environment owing to its focus on urban regeneration, although elements of this are also incorporated into Option G.

7.2.8 **Best performing – Option F**

7.3 SA Objective 2 – Landscape

- 7.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. According to the Landscape Sensitivity Assessment, the northern and southern Green Belt parcels, and a small section to the south west, are the most sensitive in Wolverhampton, identified as 'moderate-high' sensitivity. According to the Green Belt Study, development in these areas would also lead to 'very high' harm to the purposes of the Green Belt. Although Green Belt is not necessarily an indicator of higher quality landscapes, within Wolverhampton this is generally the case. All spatial options would protect Green Belt land from development.

- 7.3.2 Option A proposes to retain current housing and employment allocations in the urban area. Option E would direct housing growth to locations with the best sustainable transport access. Both could lead to more dense development in existing urban areas. Higher density developments, especially those which include taller buildings, are more likely to alter views of, or from, sensitive and important landscape features. A carefully planned design approach would be required to avoid adverse effects on landscapes. Option G also supports increased density in accessible areas, and Option F seeks to concentrate development in the central, north and east urban area, which could lead to alteration of landscape character in some instances. However, Option F's primary focus is on urban regeneration, and the balanced approach under Option G also supports this approach. Both Options F and G may provide more opportunities to enhance the character and quality of the urban landscape, which may be particularly beneficial in the Centres where local distinctiveness has been lost.
- 7.3.3 An employment-led approach under Option B may be more likely to deliver development that is in keeping with the existing built form in Centres. Although, the proposed intensification could also potentially lead to loss of open spaces and higher density developments within the urban area if there is greater demand for land to be reconfigured to employment uses, with possible localised adverse effects on the townscape.
- 7.3.4 Option D sets out a 'Garden Village' approach, with protection for existing public open spaces and integration of open spaces within new developments. This option may encourage well-designed and coherent neighbourhoods, and create attractive places to live, with benefits in terms of placemaking at the local level. It is possible that distinctive and long-distance countryside views would be altered under Option D, leading to a change in landscape character in previously undeveloped locations; although, the market-led approach proposed under Option C would be more likely to cause adverse effects in this regard as it is expected to result in a similar distribution of development to Option D but does not include the same Garden Village principles.
- 7.3.5 There is some uncertainty in determining likely impacts on landscape, as the specific location, site context and proximity to sensitive receptors of the proposed growth is unknown. All proposed spatial options have potential to cause adverse effects on existing townscapes and landscapes through loss of open space and change to local character and distinctiveness. Conversely, development could also provide opportunities to enhance the character and stimulate investment and regeneration. In considering design aspirations, the principles of the 2020 'Building Better, Building Beautiful' report¹⁴³ should be embraced alongside the National Design Guide¹⁴⁴.

¹⁴³ MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf [Date accessed: 24/11/22]

¹⁴⁴ MHCLG (2021) National Design Guide. Available at: https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf [Date accessed: 23/11/23]

- 7.3.6 The support for urban regeneration under Options F and G would be most likely to achieve minor positive impacts overall, with Option F performing the best. Weighing up the positive effects of conserving open spaces, whilst delivering new development in previously undeveloped locations, Option D could lead to an overall negligible impact.
- 7.3.7 Option B is identified as having a negligible impact on the landscape character overall, owing to the focus on employment-led development which would be more likely to be in keeping with the existing built form.
- 7.3.8 Options A, C and E could potentially result in a minor negative impact on landscape overall, as under these options development would follow market trends, or be guided by transport infrastructure, potentially leading to higher density development within the urban area but without particular consideration for landscape.

7.3.9 **Best performing – Option F**

7.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

- 7.4.1 Wolverhampton's biodiversity assets include LNRs, SINCs and SLINCs which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands. Undesignated aspects of the WLP area's GI network are also likely to serve as important corridors between habitats, facilitating movement of species and linking to the wider countryside including the Green Belt which supports various elements of the GI network, including habitats and ecological networks such as hedgerows, remnant woodland, trees and green/blue corridors.
- 7.4.2 Options A and B would focus new development in Centres, and may therefore direct development away from the most sensitive biodiversity features and areas of highest ecological value¹⁴⁵, although it should be noted that urban areas also can support distinctive habitats, species and ecological linkages. Option G supports increased housing density in accessible locations. Option E seeks to focus development in areas with the best sustainable transport access, and Option F where infrastructure opportunities are concentrated. Options E and F could therefore lead to higher density development in these areas, similarly to Option G and potentially Option A, which would help to reduce the amount of land lost to development in the Plan area. This would also reduce the amount of vegetation cover lost and, in that sense, lead to better conservation of biodiversity. Overall, Options A, B, E, F and G could lead to negligible effects on SA Objective 3.
- 7.4.3 Option D would protect existing open spaces and provide on-site open spaces within new developments. Open space is beneficial to the local biodiversity network by providing semi-natural habitats and green corridors in an otherwise highly urbanised area, supporting ecosystem services. As such, this option could provide the most opportunities for maintenance and enhancement of the ecological network alongside development. Although, Option D would also involve lower density development and potentially wider-spread loss of undeveloped land, compared to more urban-focused options. Overall, a negligible impact could result, but with potential for positive effects in the longer term.

¹⁴⁵ As identified in 'An Ecological Evaluation of the Black Country Green Belt' (October 2019). Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 28/11/22]

7.4.4 Option C's market-led approach would allocate new development in the highest demand areas, which could potentially see increased pressure on open spaces and ecological networks within the most popular areas, although it is likely that these impacts would be more localised. Option C is considered more likely to result in minor negative impact, when compared to the other spatial options.

7.4.5 It is likely that development under any spatial option would place pressure on biodiversity resources, with adverse impacts at the landscape scale despite any BNG provisions at the site level, owing to the large quanta of housing proposed. The proposed development under any of the spatial options may also have potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.

7.4.6 **Best performing – Options A and B in terms of protection of biodiversity assets, Option D in terms of opportunities for enhancement alongside lower density development.**

7.5 SA Objective 4 – Climate change mitigation

7.5.1 Option E seeks to minimise climate change impacts, by only developing housing in locations with highest sustainable transport access to residential services, and only locating employment development in areas with good public transport access. These measures would help to reduce reliance on private car use and associated emissions, and encourage uptake of sustainable transport methods including active travel for local journeys. As such, Option E would be likely to perform best with regard to climate change mitigation, although the development of new homes and businesses would be likely to lead to GHG emissions, to some extent. On balance, a minor positive impact could be achieved.

7.5.2 Options A and B would focus development within Wolverhampton's existing urban areas, likely to be in closer proximity to a range of existing jobs, services and sustainable transport infrastructure. Similarly, Option F would focus development where infrastructure opportunities are concentrated, which could lead to a large proportion of development within Centres. The balanced growth approach under Option G also supports increased housing density in the most accessible areas, drawing on Options A and E. Options A, B, E, F and G could potentially result in a minor positive impact on climate change mitigation.

7.5.3 Option C would involve provision of housing and employment growth in the most desirable locations, potentially leading to a more dispersed pattern of development, without consideration of transport infrastructure and proximity to services to meet day to day needs. A minor negative impact is identified.

7.5.4 Option D promotes mixed use development which may help to provide some services and jobs in proximity to homes; however, this approach may also lead to a greater dispersal of development and potentially a larger proportion of new residents situated further away from sustainable transport infrastructure. Pursuing this option could consequently lead to higher reliance on private cars and increased need to travel, compared to other options. Option D could therefore lead to a minor negative impact on climate change mitigation, but would be likely to perform better than Option C on the whole.

7.5.5 **Best performing – Option E**

7.6 SA Objective 5 – Climate change adaptation

- 7.6.1 This SA Objective primarily considers the impact that each spatial option could have in relation to flood risk, as well as GI coverage across the Plan area. Soils and vegetation play vital roles in attenuating flood risk, by intercepting surface water and storing water that could otherwise lead to flooding, causing harm to people and property within urban areas. Furthermore, spatial options which would lead to urban intensification can increase potential for overheating, and make the WLP area less adaptable to the effects of climate change.
- 7.6.2 Option A supports growth focused in the urban area, and Option B seeks to intensify employment land within Centres. Both options would avoid growth within the Green Belt, and as such, would be expected to conserve natural resources and reduce the amount of previously undeveloped land lost to development, with associated minor positive impacts on climate change mitigation.
- 7.6.3 Option D aims to protect open space within the urban area, and deliver new open space within mixed-use developments. Open spaces incorporating GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers¹⁴⁶, and helping to alleviate the 'urban heat island' effect. However, Option D would also result in lower density development, leading to a greater cumulative loss of previously undeveloped land and flood alleviating soils, compared to more urban-focused options. On balance, a negligible impact on climate change adaptation could be expected.
- 7.6.4 Option C seeks to allocate development towards high-demand areas, which could potentially see increased pressure on open spaces and GI within the most popular areas, although it is likely that these impacts would be more localised. Overall, a minor negative impact is identified for Option C.
- 7.6.5 Option E seeks to minimise climate change impacts by promoting development in areas that are most accessible by sustainable transport. It is likely that the majority growth would occur within the Centres, where there is highest coverage of public transport infrastructure. Similarly, Option F would concentrate development where infrastructure provision is best. Option G combines aspects of the other spatial options, with the majority of development likely to be focused in the urban area where accessibility is best, but also some more dispersal towards the northern and eastern WLP area. The extent of previously undeveloped land that could be lost under Options E, F and G is uncertain, although it is likely to be less than Option C. On balance, negligible impacts could be achieved.
- 7.6.6 **Best performing – Options A and B**

¹⁴⁶ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 25/11/22]

7.7 SA Objective 6 – Natural resources

- 7.7.1 Development focused in the existing urban area would not be expected to result in the loss of BMV land. In Wolverhampton, the majority of land is 'Urban' ALC, with some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC. Previously undeveloped land is likely to contain soils which perform ecosystem services, even if it is not of high agricultural quality. There is little undeveloped land in the WLP area that is not within the Green Belt.
- 7.7.2 Spatial Options A and B state that Green Belt would be protected, with Option A focusing housing and employment growth in the urban area and Option B intensifying employment and mixed-use development in the urban area. Therefore, Options A and B would be expected to result in a minor positive impact on natural resources, through conserving BMV soils and promoting an efficient use of land.
- 7.7.3 Option G includes increased housing density in accessible locations and "*make best use of existing infrastructure*", which would help to promote an efficient use of land. Option E would direct housing to locations with the best sustainable transport access, and Option F would concentrate development in the central, north and east urban area, which may lead to a similar urban focus for development. Although, there may still be some small-scale loss of previously undeveloped land if Options E, F or G are pursued. Overall, a negligible impact would be expected for these three options.
- 7.7.4 Option C proposes a market-led approach, which is likely to require an element of lower density development with greater land-take in desirable suburban areas, leading to loss of undeveloped land and potentially BMV soils. Option D would also result in lower density development, with integrated open spaces which may conserve natural resources to some extent, but still result in greater cumulative loss of undeveloped land compared to more urban-focused options. When considered relative to the other spatial options, a minor negative impact is identified for Options C and D in terms of loss of soil resources; this is due to the lower density development proposed under the options that could lead to greater land-take of undeveloped land.
- 7.7.5 **Best performing – Options A and B**

7.8 SA Objective 7 – Pollution

- 7.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under any spatial option would be likely to expose new residents to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- 7.8.2 Soil and water pollution impacts will depend on the nature, scale and specific location of development, and so there is a degree of uncertainty regarding the assessment under this SA Objective.

- 7.8.3 Option G supports increased housing density in accessible locations, and Option A supports housing growth in urban areas. Option E seeks to focus housing in areas with the best sustainable transport access, and Option F would focus development where infrastructure opportunities are concentrated. Options E and F could therefore lead to higher density development in similar areas. Option B seeks to retain and intensify employment land in Centres, which may have similar effects.
- 7.8.4 Higher densities of development may help to reduce the quantity of land being built on in the WLP area, which would be likely to minimise the risks of soil, air or water contamination caused by development. However, there is a general trend of air pollution in higher density urban areas having more adverse impacts on human health, compared to lower density areas¹⁴⁷. This is a result of higher pollution emissions due to human activities in densely populated street canyons, combined with taller buildings stagnating air flow. Therefore, Options A, B, E, F and G could potentially result in a minor adverse impact on pollution.
- 7.8.5 Spatial strategies involving lower density development (Option D) or a market-led approach (Option C), would be likely to result in larger proportions of development on previously undeveloped land than the more urban-focused options. Growth outside of the urban centres could potentially result in adverse impacts on pollution associated with the loss of greenfield land and natural features, and potential worsening of air, soil and water quality in these areas.
- 7.8.6 Overall, all options would be expected to expose new residents to pollution to some degree, and generate further pollution owing to the large scale of development proposed. A minor negative impact is recorded for all options, although, pursuing Option D could provide the most opportunities to protect people from adverse impacts associated with pollution, by embracing the 'Garden Village' principles and incorporating open space alongside the mixed-use development.

7.8.7 **Best performing – Option D**

7.9 SA Objective 8 – Waste

- 7.9.1 At the time of writing, there is not sufficient information available to accurately predict the effect that each spatial option would have in terms of minimising waste generation, promoting the sustainable management of waste, or encouraging recycling and re-use of waste. It is likely that all options would increase waste generation and place pressure on existing waste management systems, to some extent.

¹⁴⁷ Yuan, C, Ng, Edwards, Norford, Leslie, K. (2014) Improving air quality in high-density cities by understanding the relationship between air pollution dispersion and urban morphologies, Building and Environment, V71, pp245-258, January 2014

- 7.9.2 Options G supports increased housing density in accessible locations. Option A seeks to retain the current housing and employment allocations with a focus on the urban area, which is expected to locate site end users in similar locations and potentially similar high densities. Option E seeks to focus housing in areas with the best sustainable transport access, and Option F would focus development where infrastructure opportunities are concentrated. Options E and F could therefore lead to higher density development in these areas. Higher densities of development typically place increased demand on local waste management systems due to larger quantities and more diverse waste being generated in smaller areas, potentially leading to sanitation problems if a careful design is not implemented¹⁴⁸. Therefore, Options A, E, F and G could potentially result in a minor negative impact on waste.
- 7.9.3 On the other hand, the focus on infrastructure-led development under Option F, and the balanced growth strategy set out in Option G, could help to maximise the amount of development situated in proximity to existing waste infrastructure. Given its focus on infrastructure-led development, Option F is likely to perform best in this regard.
- 7.9.4 Option B proposes an employment-led strategy with intensification of employment land in the Centres. This option could lead to similar effects to the higher density options discussed above owing to the urban focus, but also may result in a greater quantity or range of waste associated with more employment floorspace, and potentially more diverse employment uses. A minor negative impact on waste could be expected.
- 7.9.5 Option C seeks to direct development to desirable market areas, which has the potential to increase density in certain locations, but could also result in more dispersed development in high-demand suburban locations. Option D seeks to protect and create new open spaces, which could potentially result in more development being directed towards the urban fringe. Options C and D could potentially result in a larger number of new residents located further from existing waste management systems. Therefore, these options could potentially result in a minor negative impact in regard to waste.

7.9.6 **Best performing – Option F**

7.10 SA Objective 9 – Transport and accessibility

- 7.10.1 Option E seeks to ensure that housing development is only delivered in areas with the highest sustainable transport access to residential services, and employment development where there is good public transport access. As such, this option is likely to result in a major positive impact on SA Objective 9 and would be the best performing in terms of transport and accessibility, by facilitating the most sustainable travel choices.
- 7.10.2 Options A, B, F and G would focus new development in the existing urban areas where existing transport provisions are likely to be the best, with Option G promoting higher density development in accessible locations where infrastructure is concentrated. A minor positive impact would be expected for these four options.

¹⁴⁸ London Plan Density Research: Lessons from Higher Density Development. Available at: https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf [Date accessed: 01/12/23]

- 7.10.3 Option C promotes development only in the most desirable locations, which is likely to result in more dispersed development. Option D focuses on health promotion and incorporating 'Garden Village' principles, which would be likely to include lower density development owing to the provision of on-site open space and protection of existing open spaces.
- 7.10.4 Under Options C and D, a larger proportion of development is likely to be situated away from sustainable transport options, and potentially further away from jobs and services, resulting in more reliance on private car use than other options. Overall, Options C is identified as having a potential minor negative impact on transport and accessibility. Option D could potentially perform better than C, with a negligible impact identified overall, as there would be opportunities for on-site services to be provided which may reduce the need to travel and improve local accessibility to some extent.
- 7.10.5 It should be noted that there is some uncertainty in this assessment in terms of the effect that increasing development within Centres under all spatial options could potentially have with regard to capacity issues at transport facilities and traffic congestion.

7.10.6 **Best performing – Option E**

7.11 SA Objective 10 – Housing

- 7.11.1 Option G is the only spatial option that would meet the identified housing need for Wolverhampton, although this can only be achieved through exporting a proportion of growth through DtC as per Housing Option H3 (see **Chapter 4**). A major positive impact on housing provision would therefore be expected. At this scale of assessment, the likely contribution of each spatial option to meeting the different needs of the population is uncertain, such as housing mix, and provision of extra care housing, accessible housing and affordable homes; however, Option G may provide the most opportunities for this, through varying densities depending on accessibility.
- 7.11.2 Options A, B, C, D, E and F would all lead to a shortfall against housing need, to some extent, leading to a minor positive impact on housing provision.
- 7.11.3 The delivery of housing under Options A, B, C and D would be limited by the capacity of the urban areas. Option B could result in a larger shortfall than Option A, by also restricting housing use in Centres. Option F could lead to similar effects to Option A, by ensuring all housing development is located in areas with highest sustainable transport access. Similarly, Option G seeks to focus development in the central, north and east urban area of Wolverhampton where infrastructure is most concentrated.
- 7.11.4 Under Option C, housing would only be allocated in high demand areas which may help to deliver development in more desirable locations with benefits to the housing market, but again would result in a housing shortfall and would be limited by the available land for development within Wolverhampton.

7.11.5 By protecting all publicly accessible open space and ensuring new development provides on-site open space, Option D could provide higher quality and more desirable housing, but would be likely to result in lower overall housing delivery owing to the lower density development proposed. Option E would avoid development within areas of highest Green Belt harm, which would also limit the overall land available for development.

7.11.6 **Best performing – Option G**

7.12 SA Objective 11 – Equality

7.12.1 According to the IMD, the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area.

7.12.2 Growth directed towards the Centres, such as under Options A, B, E, F and G, could potentially help to facilitate social inclusion by increasing accessibility to key services and employment opportunities; however, these strategies could also lead to exacerbation of existing inequalities by increasing housing density in deprived areas. Increased housing in these areas may lead to greater pressure on existing open spaces with adverse implications for quality of life, and more dense living situations may potentially lead to higher crime rates.

7.12.3 Although, there may be opportunities within the regeneration-led Option F to rejuvenate and enhance deprived areas. Similarly, Option G's balanced approach could lead to opportunities for localised benefits in terms of providing access to services and open spaces for recreation and community cohesion, whilst also supporting urban regeneration.

7.12.4 Greater dispersal of development and development situated in more suburban locations, such as under Options C and D could potentially be located away from essential services and employment opportunities but may have better access to open spaces and natural habitats. Although, Option D in particular could present more opportunities for creating development design and layout that seeks to reduce crime and deprivation by adopting the 'Garden Village' principles and incorporating open spaces. Option D could also integrate new local services in the proposed mixed-use schemes, although this would be unlikely to wholly alleviate the need to travel into larger Centres for certain services.

7.12.5 Option G is the only spatial option that would meet all identified housing need, and so may be more likely to ensure provision of a suitable mix of housing types and tenures, and allow greater scope to meet the varying needs of the population including provision of affordable homes. In comparison, by not delivering enough housing to meet demand, the opposite may be true for Options A, B, C, D, E and F.

7.12.6 Options B, F and G would provide enough employment land to meet demand as identified in the latest EDNA (2023), with associated benefits for equality in terms of access to jobs, in contrast to Options A, C, D and E which would lead to a shortfall, potentially increasing unemployment or requiring longer travel times to workplaces elsewhere.

- 7.12.7 Overall, Option G could be identified as the best performing, because the balanced approach would meet identified housing and employment needs, and aims to direct new development towards accessible areas, whilst also supporting urban regeneration. Option F would also be likely to result in positive effects overall owing to its emphasis on regeneration. Although there are likely benefits to pursuing Option D, it would not meet either the housing or employment needs and so on balance, a negligible impact is identified. Options A, B, C, and E would be more likely to lead to overall minor negative impacts, owing to the combination of the shortfall of housing and employment demand and additionally the likelihood of these options resulting in higher density development with adverse implications on equality.
- 7.12.8 At present, there is no evidence to suggest that any of the spatial options would disproportionately affect any of the protected characteristics¹⁴⁹ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

7.12.9 **Best performing – Option G**

7.13 SA Objective 12 – Health

- 7.13.1 Option D provides a spatial strategy focused on health promotion, which would protect all publicly accessible open spaces from development and incorporate on-site open spaces within new developments. The presence of open space can have physical and mental health benefits by facilitating residents' access to a diverse range of natural habitats, alongside providing opportunities for outdoor recreational use and attractive routes for active travel. Option D would provide on-site residential services, which would be likely to include healthcare facilities. Therefore, site end users under Option D could expect to be situated in locations with good accessibility to healthcare facilities, although growth under this option may be less well connected to sustainable transport networks than other options with a stronger focus on Centres.
- 7.13.2 Under Option C, a larger proportion of development would be likely to be situated in locations further away from existing services including healthcare facilities, reducing access to sustainable transport options and likely resulting in reliance on private car use. Site end users located in suburban areas would, however, be expected to have good access to the surrounding countryside with associated physical and mental wellbeing benefits. Overall, by protecting existing open spaces, and incorporating new open spaces within developments, Option D would be expected to result in a minor positive impact on health, whilst Option C could result in a negligible impact.

¹⁴⁹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

- 7.13.3 Although there is less emphasis on open spaces under the other spatial options, several options set out the intention to direct development towards areas with good accessibility to residential services, which would be likely to include healthcare facilities. Option A supports housing and employment growth in the existing urban area, and Option B promotes employment mixed-use developments within the existing urban area. Option E promotes development in locations with the highest sustainable transport access to services. Options F and G promote development in accessible locations where infrastructure is concentrated. Positive effects would be likely for Options A, B, E, F and G in terms of sustainable access to healthcare, whereas negative effects could occur regarding the more limited access to open spaces and potentially more crowded living situations associated with higher density urban development. On balance, a minor negative impact on health may be expected if Options A, B, E, F or G were pursued.
- 7.13.4 It should be noted that through careful, innovative and high-quality design and layout techniques there is good scope for avoiding or mitigating adverse impacts caused by higher density development, such as by providing well-resourced and high-capacity amenities, and incorporation of GI¹⁵⁰.

7.13.5 **Best performing – Option D**

7.14 SA Objective 13 – Economy

- 7.14.1 A range of employment opportunities including retail, commercial and office floorspace can be found in the WLP area, particularly the main centres. In general, it is expected that the development focused within the existing urban centres would provide the best access to the greatest range of employment opportunities as well as sustainable transport options to reach employment further afield.
- 7.14.2 Options B, F and G would meet the identified employment need for Wolverhampton. A major positive impact on the economy would therefore be expected for these three options. Option B is likely to be the best performing in terms of SA Objective 13, as it sets out an employment-led spatial strategy which promotes local employment and mixed-use schemes, which could potentially provide the greatest range of employment opportunities. In terms of access to employment opportunities, Options F and G may lead to a greater need to travel compared to B but would still result in significant benefits to the economy overall.
- 7.14.3 Option A would retain current employment allocations, and deliver housing growth in the urban areas where there is likely to be the best provision of jobs. Similarly, Option E would direct new housing and employment development to areas with the best accessibility.
- 7.14.4 Under Option C, employment uses would only be allocated in high demand areas. By directing employment development to desirable areas, it would be likely that sites will provide jobs in areas of highest demand and support economic growth in these areas. However, this option alone would not be able to meet the identified employment need.

¹⁵⁰ Wong, K. W. (2010). Designing for high-density living: High rise, high amenity and high design. In E. Ng (Ed.), Designing high density cities for social and environmental sustainability. London: Earthscan

7.14.5 Option D focuses on health promotion with a lower density approach. Under this option it is likely that development would be more dispersed, and so potentially further from the economic hubs in the Centres, but the inclusion of mixed-use development may also help to provide local job opportunities.

7.14.6 Although Options A, C, D and E would all lead to a shortfall against employment need, to some extent, an overall minor positive impact on the economy would be likely.

7.14.7 **Best performing – Option B**

7.15 SA Objective 14 – Education, skills and training

7.15.1 The extent to which all spatial options would facilitate good education for new residents is dependent on the specific location of development, which is uncertain. Access to education, skills and training (as well as transport infrastructure and safe pedestrian routes) is generally best within the city and town centres according to accessibility modelling data, with longer travel times expected in the periphery such as the north and southern extents of the WLP area. As such, the spatial options which promote urban housing development would be likely to facilitate more positive effects in this regard.

7.15.2 Option B promotes mixed-use developments within the existing urban area and Option A similarly focuses employment and housing growth in these areas in line with the 'business as usual' approach. Option E also focuses on accessibility, with development in locations with the best sustainable transport connections. Options F and G promote development in accessible locations where infrastructure is concentrated. Therefore, Options A, B, E, F and G would be expected to result in positive effects on access to education, skills and training. By only seeking to develop housing in locations with highest sustainable transport access to residential services, which would be expected to include schools, Options E and G would be likely to facilitate the best access and result in a major positive impact on SA Objective 14. Minor positive impacts would be likely for Options A, B, and F as they would deliver similar benefits but to a slightly lesser extent.

7.15.3 Option C promotes development only in the most desirable locations. This is likely to include more dispersed development that is further from schools; and in comparison to the urban areas, there is likely to be a reduced choice of educational facilities and the potential for longer travel times under Option C.

7.15.4 Option D would involve more development with lower density development based on 'Garden Village' principles, likely to be further away from existing schools and transport connections. Although, the incorporation of mixed uses could help to ensure that educational facilities are provided alongside residential growth to serve the development.

7.15.5 Overall, Option C could potentially have a minor negative impact on education, whilst Option D could result in a negligible impact.

7.15.6 **Best performing – Option E**

7.16 Conclusions

Table 7.2: Impact matrix of the seven spatial options

Spatial Option	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity	SA4 CC Mitigation	SA5 CC Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport	SA10 Housing	SA11 Equality	SA12 Health	SA13 Economy	SA14 Education
A	0	-	0	+	+	+	-	-	+	+	-	-	+	+
B	0	0	0	+	+	+	-	-	+	+	-	-	++	+
C	-	-	-	-	-	-	-	-	-	+	-	0	+	-
D	-	0	0	-	0	-	-	-	0	+	0	+	+	0
E	0	-	0	+	0	0	-	-	++	+	-	-	+	++
F	0	+	0	+	0	0	-	-	+	+	+	-	++	+
G	0	+	0	+	0	0	-	-	+	++	+	-	++	++

- 7.16.1 It is difficult to determine an overall best performing spatial option, as the performance of each option varies depending on the SA Objective in question. Generally, options which perform better against meeting development needs would also put the most pressure on environmental resources and social facilities. The subsequent paragraphs identify and explain which options perform best and which options perform worst against each SA Objective.
- 7.16.2 It is assumed within these assessments that all options will protect the Green Belt. It is recommended that this is made clear across all options to be consistent with the aims of the WLP in terms of Green Belt protection.
- 7.16.3 Options A and B performed joint best against SA Objectives 3 (biodiversity), 5 (climate change adaptation) and 6 (natural resources) due to the protection of previously undeveloped land. Option B also performed best against SA Objective 13 (economy) as it proposes an employment-led strategy.
- 7.16.4 Option D performed best against SA Objectives 7 (pollution) and 12 (health) owing to the focus on 'Garden Village' principles including the protection of existing open spaces and integration of new open spaces within new developments.
- 7.16.5 Option E performed best against SA Objectives 4 (climate change mitigation), 9 (transport and accessibility) and 14 (education), as this option would direct new development towards areas with the best sustainable transport access.
- 7.16.6 Option F performed best against SA Objectives 1 (cultural heritage) and 2 (landscape) due to its focus on urban regeneration, and SA Objective 8 (waste) due to its emphasis on concentrating development where infrastructure provision is best.

- 7.16.7 Option G performed best against SA Objectives 10 (housing) and 11 (equality), because the balanced approach would meet identified housing and employment needs, and aims to direct new development towards accessible areas, whilst also supporting urban regeneration.
- 7.16.8 The worst performing option could be identified as Option C, as the option was not identified to perform best against any SA Objectives.
- 7.16.9 Overall, Option B performs the best (or joint best) against the most SA Objectives; however, this strategy would lead to a housing shortfall. Option G is the only option that would satisfy both the identified housing and employment needs, whilst also attempting to strike a balance between retaining valuable environmental assets and prioritising development in more accessible locations which facilitate sustainable transport.

7.17 Selection and rejection

- 7.17.1 CWC's assessment of the spatial options is set out in **Table 7.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹⁵¹.
- 7.17.2 Considering the SA findings and other evidence base information, CWC consider that "*The Preferred Option G: Balanced and Sustainable Growth effectively forms a balance between the other six options and is the option which has the most potential to: provide sufficient land to meet Wolverhampton housing needs (both within Wolverhampton and in neighbouring authorities); provide sufficient employment land within Wolverhampton to meet employment land needs for Wolverhampton and allow Duty to Cooperate requirements to be met for the Black Country FEMA; and meet national guidance on sustainable development*".

¹⁵¹ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

8 Assessment of policy areas

8.1 Preface

- 8.1.1 The WLP will contain strategic planning policies and land allocations to support the growth and regeneration of the City of Wolverhampton up to 2042. The WLP Issues and Preferred Options Consultation (Regulation 18)¹⁵² document presents information relating to proposed policy areas for inclusion in the emerging WLP.
- 8.1.2 Many of the proposed policy areas for the WLP are derived from the ceased BCP. A total of 63 policies were set out in the draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022.
- 8.1.3 CWC have considered the extent to which each of the 63 draft BCP policies remains relevant and applicable to the WLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and the smaller geographic area considered within the WLP compared to the former BCP.
- 8.1.4 The results of their review have been presented in Appendix 2 of the Issues and Preferred Options document. The table 'Specific Amendments to Draft Black Country Plan Policies' of the WLP Appendix 2 identifies a suite of 56 draft policies which are likely to form the basis of the emerging WLP.
- 8.1.5 The sustainability performance of each draft policy has been evaluated based on the SA Framework (see **Appendix A**) and the methodology as set out in **Chapter 3**, drawing on the findings of the Draft BCP SA¹⁵³. The assessments are set out in full within **Appendix B**. This chapter summarises the results of these assessments.
- 8.1.6 It should be noted that the strategic policies in the WLP will be supported by a suite of local policies in other Local Plan documents (currently the Wolverhampton UDP and Area Action Plans). The WLP is not intended to cover planning policies for all subject areas, only those considered strategic in nature.

8.2 Overview of policy assessments

- 8.2.1 The impact matrix for all policy assessments is presented in **Table 8.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix B**.

¹⁵² City of Wolverhampton Council (2023) Wolverhampton Local Plan Issues and Preferred Options (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

¹⁵³ Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date accessed: 18/01/24]

- 8.2.2 The proposed policies to be included within the WLP are anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the WLP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes.
- 8.2.3 The policies cover the themes of:
- Spatial strategy;
 - Delivery;
 - Health and wellbeing;
 - Housing;
 - The economy;
 - Centres;
 - Transport;
 - Environmental transformation;
 - Climate change;
 - Waste; and
 - Minerals.
- 8.2.4 For the majority of policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the more 'thematic' policies.
- 8.2.5 A greater range of potential sustainability effects are identified for policies that have potential to introduce new development such as the housing and economy policies, or set out the broad direction for growth, such as the spatial strategy policies. As such, minor negative or uncertain impacts have been identified for some SA Objectives as a result of policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, or introduction of new development into areas where there may be sensitive receptors.
- 8.2.6 The full assessments, including text narrative to explain the identified impacts against each SA Objective, are set out in **Appendix B**.
- 8.2.7 Opportunities for enhancement may also be secured through policies in the WLP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in the SA process (see recommendations in **Chapter 10**).

Table 8.1: Summary of policy area assessments

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	0	-	-	+	+	+	+	++	+
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0
CSP3	0	-	+/-	0	0	0	0	0	+	+	+	+	+	0
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
GB1	+/-	+	+	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1 & HW3	0	+	+	+	+	0	+	0	+	+	+	++	0	0
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
HOU5	0	0	0	+	0	0	+	0	+	0	+	0	+	++
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	+	0	0	+	0	++	+	+	+	+	+
CEN3	0	0	0	0	0	0	0	0	+	+	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1 & TRAN2	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN3	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN6 & TRAN7	0	0	0	+	0	0	+	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	+	0	+	0	0	0	0	+	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

9 Assessment of reasonable alternative development sites

9.1 Preface

9.1.1 The Black Country Call for Sites request first opened in July 2017 and re-opened from 9th July – 20th August 2020¹⁵⁴. Since then, CWC have carried out annual SHLAAs of sites which have the potential to accommodate new housing development. The Wolverhampton Employment Land Supply technical paper sets out up to date information on land availability with potential to accommodate employment development.

9.1.2 A total of 48 sites have been identified by CWC as reasonable alternatives to be assessed as part of the SA, informed by the Call for Sites process and other studies undertaken as part of the evidence base for the WLP, and previously for the ceased BCP. This includes 'carried forward' housing and employment sites, which have previously been previously allocated in the adopted Development Plans. The 48 reasonable alternative sites include:

- 22 sites proposed for residential use;
- 25 sites proposed for employment use; and
- One site proposed for Gypsy and Traveller use.

9.1.3 CWC have undertaken a filtering process (or 'gateway check') of all potential sites identified through the evidence base in order to determine which sites should be considered as reasonable alternatives for the purpose of the SA.

9.1.4 If the following receptors or delivery constraints were present at a site, the Council have rejected such sites from inclusion as a reasonable alternative to be appraised through the SA process:

- Green Belt
- Flood Risk Zone 3
- Site of Special Scientific Interest
- Local Nature Reserve
- Special Area of Conservation
- Site of Importance for Nature Conservation
- Ancient Woodland / Veteran Trees
- Scheduled Monuments
- Registered Parks & Gardens
- Operational Burial Grounds
- Health and Safety Executive (HSE) Inner Zone (for residential)
- Existing residential
- Operational sites (education, leisure, utilities, places of worship, canal network, transport infrastructure)

¹⁵⁴ Black Country Plan (2020). Call for Sites. Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Date accessed: 01/12/23].

- Open Space not surplus against current standards
- Sites <0.25 ha with no "call for site" submitted
- Local authority land with no "call for site" submitted
- Landowner has expressed unwillingness

9.1.5 Identification of a site as a reasonable alternative does not imply that the site is not subject to other constraints or indeed that any receptor listed in para 9.1.4 will not in some way be potentially affected by a reasonable alternative site. Further potential constraints are assessed as part of the SA and plan making process for identified reasonable alternatives, using available evidence derived from publicly accessible data sources and information supplied by the Council.

9.1.6 Further information on the Council's identification and assessment of sites is presented within the WLP Local Plan Site Assessment Report (Regulation 18), February 2024.

9.2 Overview of site assessments (pre-mitigation)

9.2.1 **Section 3.8** sets out the methodology used to appraise the reasonable alternative sites in the SA process, and topic-specific methodologies set out in **Boxes 3.1** to **3.14** explain how the likely impact per receptor has been identified in line with the local context and assumptions as set out in **Chapter 2**.

9.2.2 The assessment of the 48 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in **Appendix C**.

9.2.3 A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation is presented in **Table 9.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix C** as well as the topic-specific methodologies and assumptions presented in **Boxes 3.1 - 3.14**.

9.2.4 It should be noted that the site assessments include an overall impact symbol, summarised in **Table 3.4**, for each of the 14 SA Objectives. **Appendix C** documents likely impacts on receptors within each SA Objective, which have been included to provide the reader with contextual information that is relevant to each SA Objective. The overall impact symbol in **Table 9.1** below for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall.

9.2.5 Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. All assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers. Post-mitigation site assessments can be prepared at the next SA stage, with reference to the mitigating influence of WLP policies, once the full policies have been prepared.

9.2.6 The pre-mitigation appraisal of the 48 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Table 9.1**.

9.2.7 Positive impacts were identified for many of the reasonable alternative sites in terms of access to social infrastructure, due to their location in areas where accessibility modelling data indicates good sustainable access to local shops, healthcare, schools, transport and employment opportunities. Identified positive impacts also included the impact of reasonable alternative sites on the provision of housing and employment floorspace, contributing to the identified needs. The majority of reasonable alternative sites are located in Flood Zone 1 away from fluvial flood risk, and many sites comprise previously developed land leading to positive effects in terms of encouraging an efficient use of natural resources.

9.2.8 Identified negative impacts included the potential for small-scale loss of soil resources at some sites, impacts on local biodiversity designations, changes to local views, possible alteration of the character or setting of cultural heritage assets, and increased pollution and waste associated with large scale development. The entirety of Wolverhampton is designated as an AQMA, and several sites are located in close proximity to main roads, and as such the proposed development could potentially expose site end users to higher levels of transport-associated air pollution. Identified negative impacts also included the location of reasonable alternative sites in regard to surface water flood risk, where a large proportion of sites are located on areas of vulnerable to surface water flooding.

Table 9.1: Summary impact matrix of all reasonable alternative sites (pre-mitigation)

Site reference	Site use	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
H1	Residential	-	+/-	+/-	-	--	+	--	-	++	++	-	++	--	++
H2	Residential	0	-	-	0	-	-	-	0	++	+	-	++	++	++
H3	Residential	-	-	-	0	-	-	--	0	++	++	-	++	++	++
H4	Residential	--	+/-	-	-	-	+	--	-	++	++	-	+	--	++
H5	Residential	-	+/-	-	0	-	+	-	0	+	++	-	++	--	++
H6	Residential	-	+/-	+/-	-	-	+	--	-	++	++	-	++	--	++
H7	Residential	0	+/-	+/-	0	+	+	--	0	++	++	-	++	++	++
H8	Residential	--	-	+/-	-	-	+	--	-	++	++	-	++	++	++
H9	Residential	-	+/-	-	0	+	-	-	0	-	+	0	++	--	-
H10	Residential	-	+/-	+/-	0	+	-	-	0	++	+	-	++	++	++
H11	Residential	--	+/-	+/-	0	+	+	-	0	++	+	-	++	++	++
H12	Residential	-	+/-	-	0	-	+	-	0	-	+	-	-	--	++
H13	Residential	-	+/-	-	-	--	+	--	-	++	++	-	++	--	++
H14	Residential	0	-	+/-	0	+	-	--	0	++	++	-	++	-	++
H15	Residential	0	+/-	+/-	0	-	-	-	0	++	+	0	++	+/-	++
H16	Residential	0	-	-	-	-	-	--	-	-	++	-	++	++	++

Site reference	Site use	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
H17	Residential	--	-	+/-	0	+	-	-	0	-	+	0	++	+/-	++
H18	Residential	0	-	+/-	0	-	-	-	0	-	+	0	-	++	-
H19	Residential	0	-	+/-	0	-	-	-	0	-	+	0	++	-	++
H20	Residential	0	-	-	0	-	-	-	0	-	+	0	++	+/-	++
H21	Residential	0	-	+/-	0	-	-	-	0	++	+	0	++	++	++
SA-0054-WOL	Residential	0	+/-	--	+/-	-	+	--	+/-	-	++	0	+	--	-
E1	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	0	+	++	0
E2	Employment	-	+/-	+/-	+/-	--	-	-	+/-	-	0	0	++	++	0
E3	Employment	0	+/-	+/-	+/-	+	+	-	+/-	-	0	-	++	+/-	0
E4	Employment	0	-	+/-	+/-	+	-	-	+/-	-	0	-	++	++	0
E5	Employment	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
E6	Employment	-	+/-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
E7	Employment	-	+/-	-	+/-	--	-	-	+/-	++	0	0	-	++	0
E8	Employment	-	+/-	-	+/-	-	-	-	+/-	++	0	0	++	++	0
E9	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	0	++	++	0
E10	Employment	-	+/-	+/-	+/-	--	+	-	+/-	-	0	0	++	++	0
E11	Employment	0	+/-	+/-	+/-	+	-	-	+/-	-	0	0	++	++	0
E12	Employment	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
E13	Employment	0	-	+/-	+/-	+	-	-	+/-	++	0	0	-	++	0
E14	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	-	++	++	0
E15	Employment	-	+/-	-	+/-	-	+	-	+/-	++	0	-	++	+/-	0
E16	Employment	-	+/-	+/-	+/-	+	-	-	+/-	-	0	-	+	++	0
E17	Employment	-	-	--	+/-	-	-	-	+/-	-	0	0	++	++	0
E18	Employment	-	+/-	-	+/-	-	+	-	+/-	-	0	-	++	++	0
E19	Employment	0	-	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
E20	Employment	0	+/-	-	+/-	+	+	-	+/-	-	0	0	+	++	0
E21	Employment	0	+/-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
E22	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
E23	Employment	-	-	-	+/-	--	-	-	+/-	++	0	-	++	++	0
E24	Employment	0	+/-	+/-	+/-	+	+	-	+/-	++	0	-	-	++	0
E25	Employment	0	-	-	+/-	-	-	-	+/-	++	0	-	-	++	0
GT1	Gypsy and Traveller	0	-	+/-	+/-	--	-	-	+/-	-	+	-	++	++	++

9.3 Selection and rejection of sites

9.3.1 Planning Practice Guidance (PPG) on SEA states that the SA/SEA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward. An overview of the reasons for site selection and rejection for each of the 48 reasonable alternative sites assessed within this SA Report have been provided by CWC, as summarised in **Table 9.2**.

9.3.2 The decision making of the Council in relation to the sites taken forward reflects the findings of the evidence base documents prepared to support the preparation of the WLP, including the findings of the SA, and the accompanying detailed site assessment proformas prepared by the Council.

Table 9.2: Outline reasons for selection / rejection of reasonable alternative sites for the WLP

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
H1	Blue Bird Industrial Estate and site to rear, Park Lane	Selected for housing	Existing housing allocation in Stafford Road Corridor Area Action Plan. Not consulted on through Draft BCP due to delivery concerns - now considered deliverable.
H2	Former G & P Batteries Site, Grove Street, Heath Town	Selected for housing	Existing allocation in Heathfield Park Neighbourhood Plan. Site has outline planning permission.
H3	East of Qualcast Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Site has outline planning permission.
H4	West of Qualcast Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Site has outline planning permission. Occupied employment land.
H5	West of Colliery Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land. Additional 1 ha suitable for other commercial uses as part of mixed use scheme.
H6	Dobbs Street, Blakenhall	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Part occupied employment land.
H7	Dudley Road / Bell Place, Blakenhall	Selected for housing	Existing allocation in Wolverhampton City Centre Area Action Plan. Site has full planning permission.
H8	Former Royal Hospital, All Saints	Selected for housing	Site is under construction.
H9	Delta Trading Estate, Bilston Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H10	Land at Hall Street / The Orchard, Bilston Town Centre	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan.
H11	Former Pipe Hall, The Orchard, Bilston Town Centre	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to retention and conversion of listed building.
H12	Lane Street / Highfields Road, Bradley	Selected for housing	Operational industrial site adjoining residential and employment, promoted for housing through the call for sites. 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. The sites falls within an Area of High Historic

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
			<p>Townscape Value (AHHTV) in the HLC Study due to the cluster of late 19th and early 20th century industrial buildings surrounding the locally listed Highfield Works building, which also falls within the Bilston Canal Corridor Conservation Area. This building could be suitable for conversion, subject to viability. Carefully designed housing development on adjoining land would not necessarily harm the setting of the Conservation Area.</p> <p>The site is suitable for development for 72 homes, subject to subject to a design which: protects the operation of employment land to the east; retains the locally listed Highfield Works building; respects the setting of this building and the Bilston Canal Corridor Conservation Area within which it falls; and respects the Area of High Historic Townscape Value designation covering the whole site; provision of off-site improvements to local open space to meet recreational open space needs of new residents.</p>
H13	Greenway Road, Bradley	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H14	Former Loxdale Primary School, Chapel Street, Bradley	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing.
H15	South of Oxford Street, Bilston	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H16	Former Northcote Secondary School, Northwood Park Road	Selected for housing	Site has full planning permission.
H17	Beckminster House, Beckminster Road	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to retention and conversion of listed building.
H18	Former Rookery Lodge, Woodcross Lane	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Outline permission for care village in 2012.
H19	Former Stowheath centres. Stowheath Lane	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing.
H20	Former Probert Court / Health Centre, Probert Road	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to relocation of existing GP surgery.
H21	Former Gym, Craddock Street	Selected for housing	Existing housing allocation in Wolverhampton Unitary Development Plan. Not consulted on through Draft BCP as operational gym - now considered deliverable.
SA-0054-WOL	Sites at Sutherland Avenue / Cooper Street	Rejected for housing	Sites in employment use within an established industrial area, promoted for housing through the call for sites. The sites are unsuitable for residential development as they are surrounded by unregulated employment uses which are important to protect for employment in line with draft BCP evidence and policies. Development of the sites would cause significant harm to the residential amenity of new residents and prejudice the operational capacity of adjoining employment uses to operate.
E1	Wolverhampton Business Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan. Site has Local Development Order and secured outline planning permission.

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
E2	Rear of IMI Marstons	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan. Site has outline planning permission.
E3	Shaw Road (north of Civic Amenity Site)	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E4	Former Strykers, Bushbury Lane	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Site has outline planning permission.
E5	Gas Holder site, Wolverhampton Science Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E6	Mammouth Drive, Wolverhampton Science Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E7	Stratosphere Site, Wolverhampton Science Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E8	Crown St/Cross St North	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan. Site has outline planning permission.
E9	Bentley Bridge Business Park, Well Lane, Wednesfield	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Site has full planning permission.
E10	Tata Steel, Wednesfield	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Site has full planning permission.
E11	Phoenix Road, Wednesfield	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Part of site has full planning permission.
E12	Land at Neachells lane	Selected for employment	Part of public open space with a SLINC designation. Site located adjoining high quality employment area with good access to the highways network, subject to junction improvements. There is a surplus in quantity of open space in this part of Wolverhampton, as set out in the 2018 Wolverhampton Open Space Strategy and Action Plan, which can support the combined loss of open space at this site, subject to investment in local open space to improve quality. Site suitable for employment development subject to mitigation and enhancement for loss of recreational open space and SLINC / nature conservation value. Capacity may be constrained by highways access onto Neachells Lane. Further assessment work is underway which will be reflected in the Publication WLP.
E13	Land rear of Key Line Builders, Neachells Lane / Noose Lane	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints.
E14	Chillington Fields	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Willenhall Road.
E15	Powerhouse, Commercial Road	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E16	Hickman Avenue	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Hickman Avenue.

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
E17	Former MEB Site, Major Street / Dixon Street	Selected for employment	Vacant land within industrial area, suitable for employment use, subject to remediation as appropriate to address known ground condition issues.
E18	Millfields Road, Ettingshall	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints.
E19	Rolls Royce Playing Fields, Spring Road	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to compensation for loss of playing field / bowling green.
E20	South of Inverclyde Drive	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E21	Rear of Spring Road	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E22	Springvale Avenue	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E23	Bilston Urban Village, Bath Street	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E24	Dale St, Bilston	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints.
E25	South of Citadel Junction, Murdoch Road, Bilston	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to remediation and mitigation for loss of nature conservation value.
GT1	Former Bushbury Reservoir, Showell Road	Selected for Gypsy and Traveller	Existing allocation in Stafford Road Corridor Area Action Plan.

10 Recommendations

10.1 Overview

10.1.1 Lepus has prepared a list of recommendations for CWC to consider as the WLP progresses in **Table 10.1**, including specific recommendations for policies (see assessment of proposed policy areas in **Appendix B**), as well as more general recommendations for future plan reviews, and wider Council initiatives.

10.1.2 These recommendations are not exhaustive, nor are they essential. Further recommendations will be provided where appropriate throughout the plan making process.

Table 10.1: SA recommendations for the Wolverhampton Local Plan

SA Objective	Recommendations
1: Cultural Heritage	<ul style="list-style-type: none"> a. Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset.
2: Landscape	<ul style="list-style-type: none"> a. Ensure development proposals aim to protect and enhance the special qualities of locally designated landscapes. b. Ensure development proposals are in-keeping with the local landscape character and the findings of the most recent Landscape Sensitivity Assessment¹⁵⁵. c. Ensure development proposals are constructed in accordance with appropriate design guides and codes, such as the 'Design: process and tools'¹⁵⁶ government guidance. d. Development proposals which have the potential to significantly adversely affect views, for example those experienced by users of the PRoW network, should incorporate appropriate mitigation.
3: Biodiversity, flora, fauna and geodiversity	<ul style="list-style-type: none"> a. Policy ENV2 or its successor should take into account the findings of the HRA when available. b. Where development proposals have the potential to adversely impact international or European designated sites, reference should be made to the Cannock Chase 'Guidance to mitigate the impact of new residential development'¹⁵⁷ and other relevant documents within the Evidence Base. c. Policies should support development which aims to protect, and where possible provide, supporting habitat to nearby Natura 2000 sites. d. CWC could strive to achieve higher BNG targets than the mandatory 10% through the WLP, for example in strategic developments. CWC could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider

¹⁵⁵ Land Use Consultants (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 21/11/23]

¹⁵⁶ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 21/11/23]

¹⁵⁷ City of Wolverhampton Planning Guidance to Mitigate the Impact of New Residential Development on Cannock Chase Special Area of Conservation (SAC) March 2022 (Updated June 2023). Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-06/Wolverhampton%20Guidance%20to%20Mitigate%20impact%20of%20Residential%20on%20Cannock%20Chase%20SAC%20June%202023.pdf> [Date accessed: 17/01/24]

SA Objective	Recommendations
	<p>range of environmental benefits and ecosystem services than BNG alone, such as for air quality and flood risk management^{158 159}.</p> <ul style="list-style-type: none"> e. Improve resilience and connectivity of biodiversity sites through landscape scale management. f. Ensure reference is made within policies to Wolverhampton’s Tree and Woodland Strategy. g. It is recommended that Evidence Base documents in relation to biodiversity (including the 2010 Birmingham and the Black Country Biodiversity Action Plan) are updated in accordance with the latest guidance.
4: Climate change mitigation	<ul style="list-style-type: none"> a. Provide necessary infrastructure to encourage low carbon options. b. Aim to protect and enhance public space to encourage safe walking and cycling opportunities. c. Where appropriate, site-specific Transport Plans should be prepared. d. Development proposals should aim to be carbon neutral. e. Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with ‘Net Zero the UK’s contribution to stopping global warming’¹⁶⁰. f. Consider retrofitting buildings to make them more energy efficient. g. It is recommended that a Climate Change Strategy is prepared, drawing on CWC’s Climate Commitment¹⁶¹. This could also help to identify the carbon capture and storage potential of the Plan area. h. Consider local partnerships to establish locally appropriate solutions to the climate crisis. i. Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared, or that GI principles are incorporated into the emerging Open Space Strategy update.
5: Climate change adaptation	<ul style="list-style-type: none"> a. Using relevant data sources, ensure development proposals incorporate green infrastructure where appropriate. a. Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. b. Development proposals should be built in accordance with the relevant Surface Water Management Plan¹⁶². It is recommended that the Surface Water Management Plan is updated. c. Ensure capacity of water treatment works is sufficient to serve new development. d. Promote increased water efficiency in new developments.
6: Natural resources	<ul style="list-style-type: none"> j. The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion.

¹⁵⁸ DEFRA (2019) Natural Capital Committee advice to government on net environmental gain. Available at: <https://www.gov.uk/government/publications/natural-capital-committee-advice-to-government-on-net-environmental-gain> [Date accessed: 09/01/24]

¹⁵⁹ National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at: <https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/#:~:text=Environmental%20net%20gain%20is%20the,to%20the%20pre%2Ddevelopment%20baseline.&text=Biodiversity%20net%20gain%20is%20a,for%20achieving%20environmental%20net%20gain.> [Date accessed: 09/01/24]

¹⁶⁰ Committee on Climate Change (2019) Net Zero The UK’s contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date accessed: 21/11/23]

¹⁶¹ City of Wolverhampton Council. Our Climate Commitment. Available at: <https://www.wolverhampton.gov.uk/environment-and-climate/climate-change-and-sustainability/climate-emergency-declaration> [Date accessed: 12/01/24]

¹⁶² Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmnt_plan.pdf [Date accessed: 21/11/23]

SA Objective	Recommendations
	<ul style="list-style-type: none"> k. Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. l. Where sites contain bare soil following construction of development, it is recommended that vegetation, in particular native plant species, be used to cover the ground. m. Ensure development proposals on contaminated land are only permitted where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use.
7: Pollution	<ul style="list-style-type: none"> a. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. b. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports. c. Ensure visual and auditory buffers are incorporated at the edge of development proposals located in close proximity to railway lines to help mitigate noise pollution. d. Ensure development proposals which could potentially result in an increase in noise disturbance are adequately mitigated, for example, through efficient layout of development, restrict activities at certain times or the use of noise insulation. e. Development proposals should be built in accordance with recommendations within the Water Cycle Study¹⁶³ and other relevant documents within the Evidence Base, including Water Resource Management Plans, Catchment Flood Management Plan and Basin Management Plans. It is recommended that a Phase 2 Water Cycle Study is carried out.
8: Waste	<ul style="list-style-type: none"> a. Development proposals should demonstrate measures to minimise waste generation during construction. b. Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting.
9: Transport and accessibility	<ul style="list-style-type: none"> a. Ensure all development proposals and Travel Plans (where applicable) aim to reduce reliance on private car use wherever possible and aim to promote access to local facilities and services in a manner which minimises climate change emissions and promotes active travel.
10: Housing	<ul style="list-style-type: none"> a. Ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools'¹⁶⁴ government guidance.
11: Equality	<ul style="list-style-type: none"> a. Ensure residential development proposals incorporate functional private or communal open space, including green space. b. Ensure development proposals provide adequate indoor space in line with the requirements set out in the technical housing standards¹⁶⁵. c. Where appropriate, consider the option for community ownership of some facilities and services. d. Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres. e. Ensure development proposals take into account privacy, access to sunlight, noise and disturbance, vibration, artificial lighting, odor, crime and safety. f. Ensure development proposals promote safe and accessible neighbourhoods, helping to reduce crime and the fear of crime. g. Consider supporting the use of the 'Secured by Design'¹⁶⁶ scheme in relation to crime prevention.

¹⁶³ JBA Consulting (2019) Black Country Councils Water Cycle Study: Phase 1 Scoping Study. Available at: https://blackcountryplan.dudley.gov.uk/media/17929/watercyclestudy_phs1_scopingstudy.pdf [Date accessed: 20/11/23]

¹⁶⁴ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 21/11/23]

¹⁶⁵ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date accessed: 21/11/23]

¹⁶⁶ Secured by Design. Available at: <https://www.securedbydesign.com/> [Date accessed: 21/11/23]

SA Objective	Recommendations
12: Health	<ul style="list-style-type: none"> a. Development proposals should take into consideration the findings of the latest Playing Pitch and Outdoor Sports Strategies, along with other relevant documents within the Evidence Base. b. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality and for air quality monitoring. c. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports. d. Improve or enhance the PRoW and cycle network across the Plan area. It is recommended that the Rights of Way Improvement Plan is updated. e. Provide or improve safe pedestrian and cycle access to public greenspaces and open spaces. f. Development proposals should be in accordance with the Open Space Strategy or subsequent updates. g. Ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists.
13: Economy	<ul style="list-style-type: none"> a. Ensure residential-led proposals are located in close proximity to bus stops or other sustainable transport options to reach employment opportunities. b. Improve access to employment opportunities, through provision of bus stops and bus services, and/ or improvements to the local pedestrian and cycle networks.
14: Education	<ul style="list-style-type: none"> a. Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need.

11 Conclusions and next steps

11.1 Consultation on the Regulation 18 Issues and Preferred Options SA Report

11.1.1 This Regulation 18 Issues and Preferred Options SA Report will be subject to consultation alongside the WLP Issues and Preferred Options consultation document and other evidence base documents between 26th February and 8th April 2024.

11.1.2 This report represents the latest stage of the SA process. Any comments received on this report during the consultation will be considered and used to inform subsequent stages of the SA process, where appropriate.

11.2 Responding to the consultation

11.2.1 All responses on this consultation exercise should be made via the CWC website using the comments form provided at <https://wolverhampton.gov.uk/planning/planning-policies> or sent to:

Post:

Wolverhampton Local Plan,
City Planning,
City of Wolverhampton Council,
St Peter's Square,
Wolverhampton,
WV1 1RP

Email: localplan@wolverhampton.gov.uk

Phone: 01902 551155

11.3 Next steps

11.3.1 Once CWC have reviewed Regulation 18 consultation comments, the next stage of plan making will begin.

11.3.2 The next iteration of the WLP will comprise the Regulation 19 'Publication' version of the WLP. At the Regulation 19 stage, preparation of an Environmental Report will begin, also known as a 'sustainability appraisal report' in PPG. The Environmental Report will include all the legal requirements set out in Regulation 12 and Schedule 2 of the SEA Regulations, enabling the Councils to meet the legal requirements set out in sections 19 and 39 of the Planning and Compulsory Purchase Act 2004.

Appendix A – SA Framework

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	a) Preserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal? b) Preserve or enhance archaeological sites/remains? c) Preserve or enhance the setting of cultural heritage assets? d) Improve the energy efficiency of historic buildings?	<ul style="list-style-type: none"> Number and type of features and areas of historic designations in the WLP area. Statutory and non-statutory sites in the Historic Environment Record (HER). Number of historic assets on the Heritage at Risk register.
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	a) Safeguard and enhance the character of the landscape and local distinctiveness and identity? b) Protect and enhance visual amenity, including light and noise pollution? c) Reuse degraded landscapes/townscapes? d) Compromise the purpose of the Green Belt e.g. lead to coalescence of settlements and/or urban sprawl?	<ul style="list-style-type: none"> National Character Area. Tranquillity rating of area. Re-use of derelict buildings or re-use of buildings in a prominent location. Landscape sensitivity.
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	a) Maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity? b) Support positive management of local sites (SLINCs and SINCS) designated for nature conservation and geodiversity value? c) Link up areas of fragmented habitat contribute to habitat connectivity? d) Increase awareness of biodiversity assets?	<ul style="list-style-type: none"> Number and diversity of European Protected Species, and NERC Act Section 41 species in the area. Area and condition of priority habitats. Area and condition of sites designated for biological and geological interest.
4	Climate change mitigation: Minimise Wolverhampton's contribution to climate change.	a) Help reduce the per capita carbon footprint of Wolverhampton? b) Encourage renewable energy generation or use of energy from renewable sources?	<ul style="list-style-type: none"> Proximity to public transport links. Frequency of nearby public transport services. Distance to local services and amenities. Energy efficiency of buildings and transport. Percentage of energy in the area generated from renewable sources.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
5	Climate change adaptation: Plan for the anticipated levels of climate change.	a) Avoid development in areas at high risk of flooding? b) Increase the area and connectivity of Green Infrastructure (GI)? c) Promote use of technologies and techniques to adapt to the impacts of climate change?	<ul style="list-style-type: none"> Number of properties at risk of flooding. Area of new greenspace created per capita. Connectivity of GI. Implementation of adaptive techniques, such as SUDS and passive heating/cooling.
6	Natural resources: Protect and conserve natural resources.	a) Utilise previously developed, degraded and under-used land? b) Lead to the loss of the best and most versatile agricultural land? c) Lead to the loss or sterilisation of mineral resources, or affect mineral working?	<ul style="list-style-type: none"> Re-use of previously developed land. Area of best and most versatile agricultural land lost to development. Groundwater Source Protection Zone. Proposed Mineral Safeguarding Area(s).
7	Pollution: Reduce air, soil, water and noise pollution.	a) Maintain and improve air quality? b) Maintain soil quality or help to remediate land affected by ground contamination? c) Maintain and improve water quality? d) Help to reduce noise pollution and protect sensitive receptors from existing ambient noise?	<ul style="list-style-type: none"> Provision of GI. Remediation of contaminated land. Proximity to watercourses with poor quality status. Percentage change in pollution incidents. Development with potential to generate a significant increase in road traffic emissions or other air pollutants.
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	a) Encourage recycling/re-use/composting of waste? b) Minimise and where possible eliminate generation of waste?	<ul style="list-style-type: none"> Number and capacity of waste management facilities. Re-use of recycled and recyclable materials. Management of local authority collected waste.
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	a) Reduce the need to travel and/or reduce travel time? b) Provide adequate means of access by a range of sustainable transport modes (i.e. walking/cycling/public transport)?	<ul style="list-style-type: none"> Distance to place of work. Distance to local amenities and key services. Distance to existing or proposed bus routes. Frequency of bus services. Proximity and connectivity of walking and cycling links. Distance to train or metro station.
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	a) Provide a mix of good-quality housing, including homes that are suitable for first-time buyers? b) Provide housing suitable for the growing elderly population? c) Provide decent, affordable and accessible homes?	<ul style="list-style-type: none"> Varied housing mix. Percentage of dwellings delivered as affordable housing. Number of extra care homes.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	<ul style="list-style-type: none"> a) Help achieve life-long learning and increase learning participation and adult education? b) Enable communities to influence the decisions that affect their neighbourhoods and quality of life? c) Reduce crime and the fear of crime? d) Advance equality of opportunity? e) Foster good community relations? f) Eliminate unlawful discrimination, victimisation and harassment on individuals or groups in the community including consideration of age, disability, gender, race, religion, gender re-assignment, maternity, sexual orientation, marriage and civil partnership, and human rights? 	<ul style="list-style-type: none"> • No. of people with NVQ2 qualifications. • Percentage of adults surveyed who feel they can influence decisions affecting their own local area. • % respondents very or fairly satisfied with their neighbourhood. • Crime Deprivation Index. • Education, Skills & Training Deprivation Index. • Availability of libraries. • Index of Multiple Deprivation
12	Health: Safeguard and improve community health, safety and wellbeing.	<ul style="list-style-type: none"> a) Improve access for all to health, leisure and recreational facilities? b) Improve and enhance Wolverhampton's GI network? c) Improve road safety? d) Reduce obesity? e) Consider the needs of Wolverhampton's growing elderly population? 	<ul style="list-style-type: none"> • Travel time by public transport to nearest health centre and sports facilities. • Provision and accessibility of open greenspace and GI. • Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres.
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	<ul style="list-style-type: none"> a) Increase accessibility of suitable employment within Wolverhampton? b) Encourage business start-ups in the area? c) Support the health of established centres? d) Protect and create jobs? 	<ul style="list-style-type: none"> • Number of residents working within Wolverhampton. • Number of employment opportunities in professional occupations. • Number of new business start-ups as a result of the development. • Total amount of employment land. • Number of vacant units in strategic centres. • Amount of additional retail, office and leisure floorspace completed in established centres.
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	<ul style="list-style-type: none"> a) Improve access for all to education and training opportunities? b) Encourage a diversity of education and training opportunities? 	<ul style="list-style-type: none"> • Distance to education and training, particularly primary schools and secondary schools. • Provision of new education and training facilities and opportunities. • Accessibility of education and training facilities by public transport. • Capacity of local schools to meet demand from new development.

Appendix B – Assessment of proposed WLP policy areas

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B.1 Overview

B.1.1 Introduction

- B.1.1.1 This appendix provides an assessment of the proposed policy areas as set out within the Wolverhampton Local Plan (WLP) Issues and Preferred Options Consultation (Regulation 18)¹ document.
- B.1.1.2 Many policies are derived from the ceased Black Country Plan (BCP). A total of 63 policies were set out in the draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022.
- B.1.1.3 CWC have considered the extent to which each of the 63 draft BCP policies remains relevant and applicable to the WLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and the smaller geographic area considered within the WLP compared to the former BCP.
- B.1.1.4 The results of CWC’s review have been presented in Appendix 2 of the Issues and Preferred Options document². The table ‘Specific Amendments to Draft Black Country Plan Policies’ of the WLP Appendix 2 identifies a suite of 56 draft policies which are likely to form the basis of the emerging WLP.
- B.1.1.5 The SA Framework (see **Appendix A**) has been used to evaluate the sustainability performance of each draft policy. Full details of the assessment methodology are presented in the SA Main Report (**Chapter 3**). For ease of reference the scoring system is summarised in **Table B.1.1**.

¹ City of Wolverhampton Council (2023) Wolverhampton Local Plan Issues and Preferred Options (Regulation 18). (Draft version provided to Lepus 13/11/23)

² Ibid

Table B.1.1: Presenting likely impacts

Likely impact	Description	Impact symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

B.1.1.6 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. All impact matrices are accompanied by an assessment narrative which describes the findings of the appraisal and provides the rationale for the recorded impact values.

B.1.2 Overview of policy assessments

B.1.2.1 The impact matrices for all proposed policy area assessments are presented in **Table B.1.2** below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

Table B.1.2: Summary of policy area assessments

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	0	-	-	+	+	+	+	++	+
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0
CSP3	0	-	+/-	0	0	0	0	0	+	+	+	+	+	0
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
GB1	+/-	+	+	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1 & HW3	0	+	+	+	+	0	+	0	+	+	+	++	0	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
HOU5	0	0	0	+	0	0	+	0	+	0	+	0	+	++
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	+	0	0	+	0	++	+	+	+	+	+
CEN3	0	0	0	0	0	0	0	0	+	+	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1 & TRAN2	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN3	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN6 & TRAN7	0	0	0	+	0	0	+	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	+	0	+	0	0	0	0	+	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

B.2 Spatial Strategy

B.2.1 Policy CSP1 – Development Strategy

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	0	-	-	+	+	+	+	++	+

B.2.1.1 Policy CSP1 will provide the overarching spatial strategy for Wolverhampton, setting out the scale and distribution of new development for the Plan period to 2042. The preferred overall spatial approach to be set out in the policy has evolved from consideration of several spatial distribution and growth options (as assessed in the SA, see **Chapters 4 – 7**), with CWC’s preferred option known as Option G: Balanced Growth (see **Chapter 7**). The WLP policy will amend the version presented in the Draft BCP, removing measures that would support release of Green Belt land and development within Neighbourhood Growth Areas.

B.2.1.2 Under Policy CSP1, the majority of development will likely be located within the existing urban areas. The preferred spatial strategy supports the redevelopment of brownfield land which represents an efficient use of land in accordance with the NPPF by locating the majority of housing within the existing urban areas, and supporting urban regeneration. Although, under the preferred spatial strategy, a proportion of growth will be exported to neighbouring areas which may include development on previously undeveloped land, and there may be some small-scale loss of previously undeveloped land within Wolverhampton’s urban area. On balance, Policy CSP1 will be likely to have a negligible impact on natural resources (SA Objective 6).

B.2.1.3 For housing growth, the preferred option would see all of the overall identified housing need of 21,720 homes³ for the Plan period up to 2042 met, with 10,307 homes supplied within Wolverhampton, and the remaining proportion exported through potential contributions through Duty to Co-operate from neighbouring authorities which have a strong relationship with Wolverhampton. For employment growth, all identified employment land requirements would be provided within Wolverhampton. A major positive impact is therefore predicted in relation to the economy (SA Objective 13), and a minor positive impact in relation to housing (SA Objective 10) as the proposed housing option would lead to achievement of this SA Objective.

B.2.1.4 The balanced approach to growth which will be proposed through Policy CSP1 is likely to have a minor positive impact on equality (SA Objective 11) in terms of accessibility to key

³ Subject to amendment at Regulation 19 / Regulation 22 stages due to annual changes in housing need and supply

services and facilities, employment opportunities and access to housing, including affordable housing, distributed in an inclusive manner across the WLP area.

- B.2.1.5 The preferred spatial strategy seeks to protect green spaces including the Green Belt and ‘wedges’ of open land, and promote regeneration within the urban areas. However, the large quantum of growth proposed could also lead to potential changes in the local landscape and townscape character. On balance, it is considered that mixed effects on the landscape (SA Objective 2) would be achieved through this policy.
- B.2.1.6 Development in the urban areas would help to minimise the overall vegetation cover lost to development. Adhering to net gain principles could also deliver positive effects in the longer term. The development strategy also provides opportunities to benefit biodiversity and geodiversity due to the protection of sensitive features, and delivery of development in the existing urban area. Overall, adhering to BNG principles and minimising the loss of environmentally valuable land would expect to have a minor positive impact on local biodiversity (SA Objective 3).
- B.2.1.7 With the addition of approximately 21,720 homes in total, this policy would be expected to increase waste generation. It is however noted that waste generation would be likely to increase with any population increases (either in existing or new homes). Overall, a minor negative impact on waste would be expected (SA Objective 8). Provisions for waste management are set out in other policies.
- B.2.1.8 The addition of 21,720 homes and 73ha of employment land will be likely to increase carbon emissions during construction and operation. The construction, occupation and operation of development is also likely to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM). However, by directing development towards the Strategic Centres and Towns, Policy CSP1 would be likely to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport. This could potentially help to improve the sustainability of development (in terms of carbon footprint) in some locations through reducing the need to travel by private car. In determining potential allocations, sites have been assessed in terms of their accessibility by all modes of transport as part of the evidence base for the WLP. This strategy is expected to have a minor positive impact on climate change mitigation (SA Objective 4) and transport and accessibility (SA Objective 9) overall. A minor negative impact is also identified in terms of pollution (SA Objective 7), taking the balance of these considerations into account.
- B.2.1.9 By directing development toward existing urban areas, this policy will be likely to locate the majority of new residents in areas with good access to existing healthcare facilities. The policy will also be expected to ensure residents retain good access to natural habitats and open spaces, with benefits to mental wellbeing. Therefore, a minor positive impact on human health is identified overall (SA Objective 12). Whilst higher density development in urban areas would help to minimise effects on natural resources, this needs to be carefully planned and designed to ensure that there are no adverse impacts on health and wellbeing.
- B.2.1.10 By directing development towards existing urban settlements, it is expected that a large proportion of new residents will be situated in close proximity to a range of educational facilities. In addition, there would likely be opportunities to provide sustainable transport

to assist travelling to these facilities compared to a more dispersed spatial approach. Overall, a minor positive impact on education is identified (SA Objective 11).

- B.2.1.11 Overall negligible effects on the cultural heritage resource of the WLP area (SA Objective 1) and climate change adaptation (SA Objective 5) have been identified on balance where it is considered that the proposed distribution of development would help to avoid or mitigate harm to the historic environment and locate development in lower areas of flood risk, as identified through the Flood Risk Assessment and subsequent policies.

B.2.2 Policy CSP2 – The Strategic Centres and Core Regeneration Areas

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0

- B.2.2.1 Policy CSP2 is expected to present the proposed Growth Network within the WLP area, made up of the Strategic Centre of Wolverhampton City Centre and Core Regeneration Areas of Bilston, Wednesfield and Stafford Road, as the primary focus for co-ordinated and sustained regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to local communities.
- B.2.2.2 It is anticipated that Policy CSP2 will have a minor positive effect on housing (SA Objective 10) and the economy (SA Objective 13) as the Strategic Centre and Core Regeneration Areas will accommodate the highest proportion of housing and employment growth and have been designed to respond to locally identified needs and encourage continued investment, taking into account the findings of the latest Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR).
- B.2.2.3 Policy CSP2, in line with the preferred spatial strategy, will support the redevelopment of brownfield land within the Strategic Centre and Core Regeneration Areas. A minor positive effect is anticipated in terms of natural resources (SA Objective 6) and landscape (SA Objective 2), owing to the primary focus on regeneration of existing urban areas and high-quality design.
- B.2.2.4 The Strategic Centre and the Core Regeneration Areas are already served by an extensive transport system and therefore provide suitable locations for economic and housing growth, although improvements are required to enhance connectivity, accessibility and environmental quality. The policy is expected to encourage improved public transport links and support the development of sustainable communities through implementing local services, active travel routes and GI networks. By placing a large proportion of new residents in these areas, it would be expected that residents would have good access to employment by foot, bicycle or public transport. A minor positive effect on transport and

accessibility (SA Objective 9), health (SA Objective 12) and climate change mitigation (SA Objective 4) is therefore considered likely under these provisions of Policy CPS2.

B.2.2.5 Policy CSP2 is also expected to set out a range of cultural, leisure and community facilities within appropriate areas, to help boost the local economy and deliver regeneration benefits. This is anticipated to have a positive impact on equality (SA Objective 11) through increased employment opportunities, access to services and community cohesion.

B.2.2.6 Assuming that reference is made to the provision of GI through this policy, it is anticipated to have a minor positive impact on biodiversity (SA Objective 3), however this could be strengthened through setting out specification of GI measures in this policy, links to other relevant policies and / or GI strategies, potentially in the supporting text.

B.2.2.7 A negligible effect is recorded for the remaining SA Objectives.

B.2.3 Policy CSP3 – Towns and Neighbourhood Areas and the Green Belt

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP3	0	0	+/-	0	0	0	0	0	+	+	+	+	+	0

B.2.3.1 Policy CSP3 will set out the approach to the Towns within the WLP area, which make up most of the existing urban area and are where the majority of residents live. The overall land use pattern is not expected to alter greatly by 2042, but there will be some incremental change through a mix of permitted and allocated sites, windfall developments and town centre regeneration activities. The WLP policy will amend the version presented in the Draft BCP, removing measures that would support release of Green Belt land and development within Neighbourhood Growth Areas.

B.2.3.2 Under Policy CSP3, the majority of development will likely be located within the existing urban areas. The preferred spatial strategy supports the redevelopment of brownfield land which represents an efficient use of land in accordance with the NPPF, by locating the majority of housing within the existing urban areas, and supporting urban regeneration. Although, under the preferred spatial strategy, a proportion of growth will be exported to neighbouring areas which may include development on previously undeveloped land, and there may be some small-scale loss of previously undeveloped land within Wolverhampton’s urban area. On balance, Policy CSP3 will be likely to have a negligible impact on natural resources (SA Objective 6).

B.2.3.3 The extent of impacts on biodiversity features is dependent on the development location and ecological characteristics of the area in question, as well as the potential for mitigation to avoid or minimise impacts as well as enhancement. This policy does however have the potential to deliver strategic GI alongside development although the extent to which this may be achieved is uncertain at this stage. Overall, mixed positive and negative effects

are therefore identified in relation to biodiversity (SA Objective 3). Negligible effects are identified in relation to climate change adaptation (SA Objective 5) due to the approach to avoiding areas at significant risk from fluvial flooding in the site selection process.

B.2.3.4 The WLP will seek to provide strong links between the Growth Network and the Towns and Neighbourhood Areas, through high-quality design and transport investment. This policy is expected to set out support for improvements to access and design and ensure integration of existing and new communities, which will help to improve residents’ access to services and facilities. In addition, the policy provides an opportunity to promote a network of GI alongside the centres and facilities. Overall, this policy will be likely to have minor positive impacts in regard to transport and accessibility, equality and health (SA Objectives 9, 11 and 12).

B.2.3.5 Despite the majority of development under Policy CSP3 being located within the existing urban area, there could be potential for adverse impacts on existing landscape resources, although there is some potential to integrate development into the existing built form and to locate development in areas of lower landscape sensitivity wherever possible, taking a balance of sustainability considerations into account. Such areas have been identified through the Landscape Sensitivity Study. Employment allocations are not subject to individual site allocation policies and are covered under the ‘umbrella’ of Policy EMP2 (Strategic Employment Areas) as well as the overarching Spatial Strategy Policies (CSP1-5, GB1-2) and Employment Policies.

B.2.3.6 It is envisaged that opportunities would be sought to integrate high quality multi-functional GI into the designs and strengthen a wider GI network for all developments. This would also be beneficial to the local landscape by providing distinctive views of green space and natural features, which help to define local character whilst also delivering benefits to mental health and wellbeing. The provision of new open and green spaces can also help create attractive places to live and strengthen sense of place. It is anticipated that Policy CPS3 will seek to facilitate a network of GI alongside the centres and community facilities. Overall, a negligible impact on landscape resources (SA Objective 2) is predicted.

B.2.4 Policy CSP4 – Achieving well-designed places

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0

B.2.4.1 Policy CSP4 will help to ensure that all new developments within the Plan area are of high-quality design and have regard for the natural, built and historic environment. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.2.4.2 It is expected that Policy CSP4 will seek to ensure development protects and enhances the historic character and local distinctiveness within Wolverhampton. The implementation of

high-quality design would help to ensure that new development does not have an adverse impact on, and where possible enhances, any surrounding heritage assets. Therefore, a minor positive impact on cultural heritage is identified (SA Objective 1).

B.2.4.3 This policy should help to ensure that building design is carefully considered to provide appropriate size, scale and type of development depending on the local characteristics, which would help to reduce potential adverse impacts of new development and ensure development is in keeping with the existing landscape character. A minor positive impact in relation to landscape will be likely (SA Objective 2).

B.2.4.4 Well-designed places should emphasise the importance of biodiversity features and making space for nature, including green and blue infrastructure within the urban area. Policy provisions relating to the protection and enhancement of habitats and corridors could include reference to the canal network and the promotion of a multi-functional open space network alongside development. Overall, assuming such provisions will be included, a minor positive impact on biodiversity is identified (SA Objective 3).

B.2.4.5 This policy will be likely to encourage climate change resilience and help reduce carbon emissions associated with development, by promoting energy efficient design. The use of modern and sustainable technologies is likely to have minor positive impacts on carbon emissions and flood risk (SA Objectives 4 and 5).

B.2.4.6 Under this policy, well-connected layouts would likely be encouraged, including public transport provisions, which will help to reduce private car use and lead to benefits in terms of carbon emissions, air pollution and congestion. This would be expected to result in a minor positive impact on climate change mitigation, pollution, transport and accessibility (SA Objectives 4, 7 and 9).

B.2.4.7 By focusing on design, it is likely that Policy CSP4 will help to promote natural surveillance to reduce the fear of crime and encourage social interaction within the local community. Therefore, a minor positive impact on equality could be achieved (SA Objective 11).

B.2.4.8 It is assumed that the policy will support the provision of pedestrian and cycling routes within developments, to facilitate active travel and provide open space for outdoor exercise and personal reflection. Furthermore, the policy’s focus on providing high quality design could potentially result in improved living conditions with benefits to human health. Policy CSP4 could help to encourage residents to live healthy lifestyles, and therefore, a minor positive impact on health is identified (SA Objective 12).

B.2.5 Policy CSP5 – Cultural Facilities and the Visitor Economy

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0

- B.2.5.1 Policy CSP5 will focus on the protection, enhancement, promotion and expansion of cultural, tourist and leisure facilities within Wolverhampton. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP, other than the addition of a point stating *“An assessment should be undertaken (as part of the design of new developments likely to attract large numbers of people) to demonstrate and document how potential security and crime-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate”*.
- B.2.5.2 Policy CSP5 will be likely to have a minor positive impact on the economy through the safeguarding and promotion of cultural and leisure sites and by enhancing the tourism potential of the WLP area.
- B.2.5.3 A minor positive impact on climate change mitigation, transport and accessibility and health (SA Objectives 4, 9 and 12) could be achieved through provisions to maximise accessibility and secure necessary supporting infrastructure, facilitating linkages to centres including via public transport.
- B.2.5.4 By aiming to enhance cultural and tourist facilities, it is likely that the policy will also help to ensure developments are of high-quality design, create attractive areas, and promote the use of local features. Therefore, Policy CSP5 is likely to have a minor positive impact in relation to landscape (SA Objective 2). In addition, through seeking to ensure cultural facilities are protected and enhanced the policy could potentially facilitate engagement and local awareness of the WLP area’s heritage resources and cultural history. This would be likely to have a minor positive impact on cultural heritage (SA Objective 12).
- B.2.5.5 The proposed additional text relating to addressing potential security and crime-related vulnerabilities within this policy will be likely to have benefits to the community and promote social inclusion. The policy in of itself would also be likely to promote a sense of local identity through promoting enhancement of cultural facilities and boosting tourism. A minor positive impact on equality is therefore identified (SA Objective 11).

B.2.6 Policy GB1 – The Black Country Green Belt

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB1	+/-	+	+	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

- B.2.6.1 Policy GB1 will set out CWC’s approach to the Green Belt. The decision has been taken by CWC to not review the Green Belt through the emerging WLP, and as such, the Green Belt will largely remain protected from development other than exceptional circumstances as set out in the NPPF.

- B.2.6.2 Paragraph 137 of the NPPF⁴ states *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.
- B.2.6.3 Wolverhampton’s Green Belt comprises open countryside surrounding the urban area to the north and south, and a green corridor following the Smestow Brook and Staffordshire and Worcestershire Canal. The policy should seek to ensure opportunities are sought to enhance the value and function of the Green Belt. Overall, it is considered likely that this policy would have a minor positive impact on the landscape, owing to the protection of Green Belt land from inappropriate development, with consequent benefits relating to the conservation of the countryside and previously undeveloped land (SA Objective 2).
- B.2.6.4 The majority of the WLP area is identified as ‘urban’ Agricultural Land Classification (ALC), however, some areas of Wolverhampton’s Green Belt have been identified as Grade 2 or 3 ALC, which could potentially represent some of Wolverhampton’s ‘best and most versatile’ (BMV) agricultural land (as current broad-scale regional mapping does not distinguish between Grade 3a and Grade 3b land). Policy GB1 would protect BMV land, as well as ecologically or environmentally valuable soils, through the protection of the Green Belt. Therefore, a minor positive impact on natural resources is identified (SA Objective 6).
- B.2.6.5 Policy GB1 is expected to include provisions to enhance biodiversity features and additionally would protect ecological networks by directing development away from the Green Belt. Overall, a minor positive impact on local biodiversity could be expected (SA Objective 3).
- B.2.6.6 At present, an uncertain impact has been identified on the remaining SA Objectives (1, 4, 5, 7, 8, 9, 10, 11, 12, 13 and 14). The extent of impacts on these objectives will be dependent on the specific wording of the new policy for the WLP including any criteria for permitted development within the Green Belt.

B.2.7 Policy GB2 – Extensions and Replacement Buildings in the Green Belt

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0

⁴ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/11/23]

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- B.2.7.1 Policy GB2 concerns extensions and replacement buildings in the Green Belt. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.
- B.2.7.2 Paragraph 149 of the NPPF⁵ states "*a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are ... c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces*". In accordance with the NPPF, Policy GB2 will support the extension or replacement of existing buildings in the Green Belt where appropriate. Extensions should be of the same scale and design of the surrounding built environment and in keeping with the local character.
- B.2.7.3 The policy is expected to ensure that commercial, educational and community uses located within the Green Belt can continue to grow and support the local community and economy. As local businesses and facilities with value to the community would likely be supported under this policy, minor positive impacts would be likely in relation to equality of the local community and the local economy (SA Objectives 11 and 13).
- B.2.7.4 Development under this policy is unlikely to significantly impact the local landscape or historic environment due to the small scale of development which could come forward. Therefore, negligible impacts regarding cultural heritage and landscape would be expected (SA Objectives 1 and 2).

⁵ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/11/23]

B.3 Delivery

B.3.1 Policy DEL1 – Infrastructure Provision

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

B.3.1.1 Policy DEL1 will set out the requirements to ensure that all new developments are supported by necessary infrastructure, both on and off site, to promote sustainable development. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.3.1.2 This policy is expected to help ensure development proposals do not result in adverse impacts on environmental features and are situated in sustainable locations. However, without providing specific details of how development proposals will meet these criteria the overall effects of the policy are difficult to determine. Therefore, whilst this policy is not be expected to result in any direct positive impacts on any of the SA Objectives, this policy will likely help to prevent development proposals resulting in adverse impacts. Overall, negligible impacts are identified for all SA Objectives at this stage of assessment.

B.3.2 Policy DEL2 – Balance between employment land and housing

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0

B.3.2.1 Policy DEL2 will aim to support the development of windfall sites on previously developed land, subject to meeting certain criteria. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.3.2.2 By supporting windfall development, this policy will be likely to have a minor positive impact on the provision of housing and employment land within Wolverhampton (SA Objectives 10 and 13).

B.3.2.3 Development directed toward brownfield land would be classed as an efficient use of land and would help to prevent the unnecessary loss of soil within the WLP area. Therefore,

Policy DEL2 is likely to have a minor positive impact on natural resources (SA Objective 6).

B.3.2.4 It is expected that, in accordance with Policy DEL2, windfall development will be permitted in sustainable locations, and therefore, this will be expected to ensure site end users have good access to sustainable transport options. This could potentially result in a minor positive impact on transport and accessibility (SA Objective 9).

B.3.3 Policy DEL3 – Promotion of Fibre to the Premise and 5G Networks

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0

B.3.3.1 Policy DEL3 will support the provision of Fibre to the Premise (FTTP) for development of ten or more dwellings and 5G networks in principle. The promotion of such infrastructure will be likely to help ensure that development proposals can meet the needs of the current and future population. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.3.3.2 With the development of FTTP and roll-out of 5G within Wolverhampton promoted under this policy, residents will be likely to have greater access to essential services from home and workplaces. This would provide increased opportunities to work from home and access to a wider range of employment opportunities, resulting in a minor positive impact on the local community and economy (SA Objective 13). By increasing coverage of high-speed internet and improving online employment opportunities, the policy could potentially also lead to a minor positive impact on equality (SA Objective 11).

B.3.3.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on private car use for commuting to workplaces, and in turn, reduce local congestion. This policy could therefore lead to an indirect minor positive impact on climate change mitigation and transport, due to reduced emissions and congestion associated with less traffic (SA Objectives 4 and 9).

B.4 Health and Wellbeing

B.4.1 Policy HW1 – Health and Wellbeing and Policy HW3 – Health Impact Assessment (HIA)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW1 & HW3	0	+	+	+	+	0	+	0	+	+	+	++	0	0

- B.4.1.1 Policy HW1 will outline the strategic approach to promoting health and wellbeing across all new development proposed within the WLP. The WLP policy will amend the version presented in the Draft BCP, to set out the requirement for applicants to demonstrate that proposals have a positive effect on health and wellbeing in line with other WLP policies, rather than setting out detailed criteria.
- B.4.1.2 The policy will also set out detail on “*restrictions to hot food takeaways, shisha bars, off licenses, licensed premises, betting shops and other uses with a potential negative effect on public health*”. This would be expected to help encourage healthier lifestyles, and could also help to avoid developments that harm the local townscape character.
- B.4.1.3 Policy HW1 is proposed to be merged with Policy HW3, which sets out the requirement for development proposals to undertake a Health Impact Assessment (HIA) to help to ensure that opportunities for promoting healthy lifestyles are maximised. The new combined policy will set out further clarification compared to the version presented in the Draft BCP for when HIA is required, including a full HIA for development over 100 dwellings / 5,000sqm, or a HIA screening for those between 20-100 dwellings / 1,000-5,000sqm.
- B.4.1.4 By requiring some developments to submit an HIA, this policy is likely to help ensure development proposals do not have direct adverse impacts on: residents’ physical or mental health; social, economic and environmental living conditions; demand for or access to health and social care services; or an individual’s ability to improve their own health and wellbeing. Therefore, this policy will also be likely to have a minor positive impact in relation to equality (SA Objective 11).
- B.4.1.5 The policy is expected to incorporate measures which aim to protect and enhance green and blue infrastructure within the WLP area, which will likely lead to a minor positive impact on the quality and character of the landscape (SA Objective 2). Furthermore, the protection and enhancement of green and blue spaces will likely result in a minor positive impact in regard to biodiversity through the potential provision of wildlife habitats and improved connectivity (SA Objective 3).

- B.4.1.6 Enhanced green and blue infrastructure can have many benefits in helping communities adapt to the changing climate. This includes mitigation of extreme temperatures and flooding, as well as carbon storage and filtration of pollutants due to enhanced vegetation coverage. Therefore, the policy could potentially result in a minor positive impact on climate change adaptation (SA Objective 5).
- B.4.1.7 It is assumed the policy will also seek to address health and wellbeing within homes, by promoting energy efficiency and affordable warmth, as well as high quality buildings which are future-proofed to the effects of climate change. If all new homes are energy efficient, the implementation of this policy would decrease the volume of greenhouse gases (GHGs) emitted, including carbon, and as such, have a minor positive impact on climate change mitigation (SA Objective 4), as well as a minor positive impact on housing (SA Objective 10). This would also be likely to address fuel poverty and health inequalities.
- B.4.1.8 The policy is expected to ensure proposals address potential impacts affecting new development including air, noise, water and ground pollution, to ensure healthy living situations. A minor positive impact on pollution would be expected (SA Objective 7).
- B.4.1.9 A key element of healthy populations is promoting active lifestyles. The policy is expected to promote active travel and sustainable transport options, which could potentially encourage people to engage in higher levels of daily physical activity. This would also be likely to help reduce reliance on private car use. This could also result in consequent benefits in terms of reducing the emission of road transport-associated pollutants which can be harmful to health, potentially leading to minor positive impacts regarding climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).
- B.4.1.10 This policy will be likely to provide residents with access to a diverse range of natural habitats. Access to open and natural spaces would be expected to have benefits to mental and physical wellbeing. Facilitating active travel would be expected to encourage residents to live healthier lifestyles and provide opportunities for outdoor exercise, resulting in benefits to health and wellbeing. As the policy may contribute towards reduced air and noise pollution, this could also help to protect residents within Wolverhampton from health problems associated with pollution. Overall, a major positive impact in relation to human health would be expected (SA Objective 12).

B.4.2 Policy HW2 – Healthcare Infrastructure

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0

- B.4.2.1 Policy HW2 will seek to ensure that all new healthcare facilities are well designed and accessible, and that sufficient healthcare infrastructure is in place to support the existing

population and future growth in Wolverhampton. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

- B.4.2.2 By protecting existing health facilities, and ensuring residential developments are assessed against the capacity of surrounding facilities and new facilities, the policy will be expected to help ensure all new residents have good access to healthcare facilities, and as such, a major positive on health is likely (SA Objective 12).
- B.4.2.3 By identifying and addressing accessibility gaps, this policy will also be expected to promote equal access to healthcare and could potentially help to reduce health inequalities; therefore, a minor positive impact on equality is identified (SA Objective 11).
- B.4.2.4 This policy should help to ensure that healthcare developments are located in areas with good public transport access, and that where possible, healthcare facilities are co-located alongside other community services to serve nearby residential development. This policy could potentially reduce the need to travel and reduce the volume of visitors arriving at facilities via private car, with subsequent benefits in terms of reducing local congestion and transport-associated emissions. Therefore, assuming the policy places focus on sustainable transport and accessibility, a minor positive impact on climate change mitigation, pollution and transport could potentially be achieved (SA Objectives 4, 7 and 9).

B.5 Housing

B.5.1 Policy HOU1 – Delivering Sustainable Housing Growth

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-

B.5.1.1 Policy HOU1 will set out the housing need and supply figures for Wolverhampton over the Plan period to 2042. This is expected to include the delivery of a high quantum of residential development of 21,720 net new homes over the Plan period, including a housing supply for the WLP of 10,307 homes. A major positive impact on housing provision would be expected (SA Objective 10).

B.5.1.2 The impact on the remaining SA Objectives is uncertain, as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendices (see **Appendix C** for the assessment of reasonable alternative sites).

B.5.2 Policy HOU2 – Housing Density, Type and Accessibility

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0

B.5.2.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.

B.5.2.2 Policy HOU2 will aim to ensure that residential developments meet the local housing need, supporting the current and future requirements of the population in terms of housing type and size. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

- B.5.2.3 The policy will set out criteria for accessibility standards, which would be expected to ensure housing is provided in sustainable locations which results in a reduced need to travel, encourages local shopping, and promotes social inclusion in the community. This will be likely to have a minor positive impact on local accessibility, housing provision and equality (SA Objectives 9, 10 and 11).
- B.5.2.4 Due to the anticipated requirement to ensure that the density and type of housing development is informed by the level of accessibility via sustainable transport, this policy could potentially help to reduce emission of road transport associated GHGs and air pollutants. Therefore, a minor positive impact would be anticipated on climate change mitigation and pollution (SA Objectives 4 and 7).
- B.5.2.5 By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 12).

B.5.3 Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0

- B.5.3.1 Policy HOU3 will seek to ensure an appropriate mix of affordable and accessible homes are delivered across the Plan area, as well as the opportunity for self-build homes. The policy is also expected to set out requirements for developments where the criteria for affordable, accessible and self-build homes on site are not viable.
- B.5.3.2 The policy will help to ensure that, throughout the Plan area, the WLP delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. This policy will set out the requirements for affordable housing delivery, to contribute towards meeting the social and economic needs of the population.
- B.5.3.3 Future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs. Policy HOU3 will be likely to help ensure residential developments allow for the safe and convenient access for all residents, including older people and wheelchair users.
- B.5.3.4 This policy will also address the needs of those wishing to build their own homes by setting out self-build housing requirements. This would help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of residents.
- B.5.3.5 Overall, Policy HOU3 is anticipated to result in minor positive impacts in relation to housing, equality and human health (SA Objectives 10, 11 and 12).

B.5.4 Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+

- B.5.4.1 Policy HOU4 will set out the Gypsy and Traveller and Travelling Showpeople accommodation need and supply figures for Wolverhampton over the Plan period to 2042 in accordance with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) (2022)⁶ and any subsequent updates.
- B.5.4.2 The current Wolverhampton Gypsy and Traveller pitch need up to 2032 is 33 pitches and the current supply figure for the emerging WLP is 14 pitches. DtC contributions will therefore be sought from neighbouring authorities for 19 pitches to address unmet need. The remaining need for the rest of the Plan period to 2042 is expected to be met through windfall development.
- B.5.4.3 This policy will be expected to meet the identified pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs as set out in the GTAA. Therefore, this policy would be likely to have a minor positive impact on housing (SA Objective 10).
- B.5.4.4 The policy is also likely to have a minor positive impact on equality, as the provision of Gypsy and Traveller pitches will help to ensure that a diverse range of residents in the WLP area have access to appropriate accommodation to suit their needs (SA Objective 11).
- B.5.4.5 Policy HOU4 is expected to set out criteria which will require all development proposals for pitches and plots to have good access in accordance with Policy HOU2, integrate with neighbouring communities, include play areas and access roads, and have adequate access to on site services including water supply, power, drainage, sewage and waste disposal. These requirements would be expected to result in minor positive impacts in regard to transport and accessibility, equality, health and education (SA Objectives 9, 11, 12 and 14).
- B.5.4.6 The impact on the remaining SA Objectives is uncertain, as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics and the provisions within the fully worded policy, when available. The proposed Gypsy and Traveller sites are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendix (**Appendix C**).

⁶ RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Final Report, April 2022.

B.5.5 Policy HOU5 – Education Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU5	0	0	0	+	0	0	+	0	+	0	+	0	+	++

B.5.5.1 Policy HOU5 will support the development or expansion of education facilities secured through a range of funding measures, including s.106 agreements. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. It is expected that the policy will set out criteria to ensure that new facilities are in suitable and accessible locations to meet needs. The policy will also help to protect and enhance existing facilities. A major positive impact on education is therefore likely (SA Objective 14).

B.5.5.2 Improved access to education will also be likely to have benefits to the local economy, by ensuring a greater proportion of residents have skills desirable in many employment opportunities. The policy is expected to address accessibility gaps and ensure all residents have good access to educational facilities via public transport. Therefore, this policy will be likely to have a minor positive impact on transport and accessibility, equality and the local economy (SA Objectives 9, 11 and 13).

B.5.5.3 Assuming the policy promotes new education facilities that are accessible via public transport and active travel measures, this could potentially result in a minor positive impact on climate change mitigation and pollution, by reducing reliance on travel via car and consequently reducing emission of GHGs and harmful pollutants (SA Objectives 4 and 7).

B.5.6 Policy HOU6 – Houses in Multiple Occupation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0

B.5.6.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen. Policy HOU6 will set out support for the development of HMOs, providing the proposal is in accordance with the criteria set out in the policy. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy will be likely to provide a range of housing options to residents of Wolverhampton, and therefore, is expected to have a minor positive impact on housing and equality (SA Objectives 10 and 11). In addition, the policy seeks to ensure

the development of any HMOs would not significantly impact cultural heritage, landscape or biodiversity features.

- B.5.6.2 This policy will help to ensure that development proposals for the creation of HMOs are located in areas with good access to public transport and active travel infrastructure. This would be expected to have a minor positive impact on transport and accessibility and could potentially encourage outdoor exercise and active travel, with benefits to human health and wellbeing (SA Objectives 9 and 12).

B.6 The Economy

B.6.1 Policy EMP1 – Providing for Economic Growth and Jobs

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-

B.6.1.1 CWC seeks to allocate sufficient employment land for the WLP period to 2042 to meet the employment land need for Wolverhampton of 116ha as identified in the EDNA (2023). Policy EMP1 will set out the employment need and supply figures and will be updated as of April 2024 for the Publication and Submission stages to ensure the latest evidence is considered.

B.6.1.2 A major positive impact on the economy (SA Objective 13) would be expected, by ensuring that sufficient employment land is provided to meet identified needs.

B.6.1.3 The impact on the remaining SA Objectives is uncertain, as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report (see **Appendix C** for assessment of reasonable alternative sites).

B.6.2 Policy EMP2 – Strategic Employment Land

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-

B.6.2.1 Policy EMP2 will relate to Strategic Employment Land within the WLP area. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. The Strategic Employment Areas correspond to areas of highest market demand and as such development or redevelopment within these areas will be likely to have benefits to the local economy, as employment land would be located in desirable areas and would provide technology to enable businesses to thrive.

- B.6.2.2 The policy will help to ensure that Strategic Employment Areas are highly accessible to ensure residents have good access to employment opportunities and surrounding services via sustainable transport modes. Therefore, a minor positive impact in relation to transport and accessibility is identified (SA Objective 9).
- B.6.2.3 At present, the impact for the remaining SA Objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12 and 14).

B.6.3 Policy EMP3 – Local Employment Areas

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-

- B.6.3.1 Policy EMP3 will seek to allocate Local Employment Areas to support the provision of industrial, logistics and commercial activities which will be likely to result in benefits for the local economy and provision of local employment opportunities. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. A minor positive impact on the economy will be likely (SA Objective 13).
- B.6.3.2 The policy is expected to provide for a range of industries including waste collection, transfer and recycling, which could lead to a minor positive impact on waste (SA Objective 8).
- B.6.3.3 The impact on the remaining SA Objectives is uncertain, due to the unknown site-specific contextual factors.

B.6.4 Policy EMP4 – Other Employment Sites

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-

- B.6.4.1 Policy EMP4 regards employment sites that are not designated as either Strategic Employment Areas or Local Employment Areas, but comprise existing occupied employment land. The policy will support new employment uses or extensions within these sites. The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to ensure that where proposals involve redevelopment of land currently in employment use to non-employment use, they will ensure:

- “if the site is vacant, that it has been marketed for employment use for a period of at least 6 months, including by site notice and through the internet or as may be agreed by the local planning authority;
- if the site is occupied or part occupied, that successful engagement has been undertaken with the occupiers to secure their relocation; and
- if the site forms part of a larger area occupied or last occupied for employment, that residential or any other use will not be adversely affected by the continuing operation of employment uses in the remainder of the area’.

B.6.4.2 The policy will be likely to increase the provision of employment floorspace across the WLP area, and result in a minor positive impact on employment opportunities and the economy (SA Objective 13).

B.6.4.3 This policy will support the redevelopment of some employment sites to housing or other non-employment uses, where the employment site is no longer required for employment purposes. Therefore, this could potentially result in a minor positive impact on local housing provision (SA Objective 10).

B.6.4.4 At present, the specific proposals and locations of the allocations to be set out through this policy is unknown. Therefore, the impact of Policy EMP4 on the remaining SA Objectives is uncertain.

B.6.5 Policy EMP5 – Improving Access to the Labour Market

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+

B.6.5.1 Policy EMP5 will aim to support proposals for new employment development, so long as the employment opportunities are accessible, in particular for disadvantaged people and residents in the most deprived areas of the WLP area. The development of new employment sites is expected to have a minor positive impact on the economy (SA Objective 13). Ensuring the associated employment opportunities are available for all residents within the Plan area will be likely to have a minor positive impact in relation to equality (SA Objective 11) and health and wellbeing (SA Objective 12).

B.6.5.2 Furthermore, this policy will be likely to have benefits to education, by ensuring a diverse range of residents have access to training opportunities to increase their skills and employability. Therefore, a minor positive impact on education is identified (SA Objective 14).

B.7 Centres

B.7.1 Policy CEN1 – The Black Country Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-	+	+	+	+/-

- B.7.1.1** Policy CEN1 will set out the hierarchy of centres and relevant thresholds for impact tests. The policy will aim to ensure centres in the WLP area provide residents with services and facilities that meet the local needs in regard to retail, leisure, commercial, residential, community and civic services. The strategic centre (Tier One) for the WLP area is Wolverhampton City Centre. There are two town centres (Tier Two): Bilston and Wednesfield, and several district and local centres (Tier Three).
- B.7.1.2** The retail hierarchy as set out under this policy will be likely to ensure a range of facilities are provided at appropriate locations to meet the local need. Furthermore, the policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to state that *“In order to have a successful evening economy it is important that a variety of facilities, appealing to a wide range of age and social groups, are provided in such a way to ensure a safe, accessible and inclusive environment and any anti-social behaviour is discouraged”*. As such, the policy is expected to have benefits to the local community, ensuring all residents have access to essential services, and the local economy, through encouraging economic regeneration. Therefore, Policy CEN1 will be likely to have minor positive impacts in relation to equality and the economy (SA Objectives 11 and 13).
- B.7.1.3** The policy is expected to ensure that development proposals within centres are accessible via a variety of sustainable travel options, in particular public transport, walking and cycling. This policy will be likely to encourage residents to live healthy lifestyles by supporting active travel. By encouraging residents to use public transport, this could subsequently reduce the number of cars on the road network, with likely benefits for carbon emissions, congestion and air quality in terms of human health (SA Objectives 4, 9 and 12).
- B.7.1.4** The type, scale and quantity of development that may be directed to each of the identified centres under this policy is currently not known as this policy sets out the strategic context, priorities and approach to centres. There is also uncertainty about the impact and recovery of centres in the light of the COVID-19 pandemic. Therefore, at this stage, the impact development proposals may have on the remaining SA Objectives is unknown. At present, the likely impact is recorded as uncertain (SA Objectives 1, 2, 3, 5, 6, 7, 8, 10 and 14).

B.7.2 Policy CEN2 – Strategic Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN2	0	0	0	+	0	0	+	0	++	+	+	+	+	+

- B.7.2.1 Policy CEN2 will support development and diversification within the Strategic Centre of Wolverhampton City Centre. Development proposals which would increase retail provision, jobs and services will be supported under this policy. Policy CEN2 will seek to ensure that development within Strategic Centres includes a balanced mix of uses to support different industries.
- B.7.2.2 The specifications of Policy CEN2 will be likely to provide improved employment opportunities and retail developments to boost the local economy as well as human health and equality, by helping to ensure all residents have good access to a range of services and facilities, including education and healthcare, by providing community uses within centres. Overall, this policy will be likely to have minor positive impact in relation to equality, health, economy and education (SA Objectives 11, 12, 13 and 14).
- B.7.2.3 The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to provide further detail regarding accessibility to Wolverhampton Strategic Centre, including that it “*should be accessible by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial, leisure and business development that require a Transport Statement within Wolverhampton Strategic Centre boundary shall evidence the means to which they are compatible with achieving sustainable development*”.
- B.7.2.4 Furthermore, the policy is proposed to provide clarity on the proportionate nature and scope requiring proposals to demonstrate compatibility with, and contribute towards, accessibility and sustainable development in the light of issues raised in Draft BCP consultation responses and the Black Country Parking Study (2023).
- B.7.2.5 Overall, a major positive impact on transport and accessibility could be achieved (SA Objective 9), with a potential minor positive impact on climate change mitigation (SA Objective 4) and pollution (SA Objective 7) owing to the focus on sustainable travel, which would help to encourage a modal shift away from private car use and consequently a reduction in transport-associated emissions.
- B.7.2.6 The amended policy for the WLP will also emphasise the importance of housing provision for Wolverhampton City Centre, and for the City Centre housing target to reflect up to date and robust evidence to inform the Wolverhampton City Centre Supplementary Plan. A minor positive impact on housing provision (SA Objective 10) will therefore be likely.

B.7.3 Policy CEN3 – Tier Two Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN3	0	0	0	0	0	0	0	0	+	+	+	+	+	0

B.7.3.1 The aim of Policy CEN3 is to help direct appropriate development to the Town Centres as identified under Policy CEN1. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.7.3.2 The policy will support the development of retail, office, leisure, residential, community, education and cultural facilities within the Town Centres. This will be expected to ensure there is adequate supply of employment opportunities within these areas. In addition, this policy will be likely to support a diverse range of services and facilities within Town Centres, ensuring good accessibility for existing local residents and promoting community cohesion. The policy could potentially direct some residential development to these areas, further ensuring that new residents would also have good access to services, and boosting the local economy. This will be expected to have minor positive impacts in relation to accessibility, housing, equality, health and the economy (SA Objectives 9, 10, 11, 12 and 13).

B.7.4 Policy CEN4 – Tier Three Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0

B.7.4.1 Policy CEN4 seeks to support development within district or local centres that would serve communities, including food stores and day-to-day services. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy could potentially help to encourage social interaction and community cohesion, and help to meet the needs of the community within the local area, reducing the need to travel. This will be likely to have a minor positive impact in relation to local accessibility and equality (SA Objectives 9 and 11).

B.7.4.2 By supporting development within district and local centres and providing job opportunities, this policy will also be likely to have a minor positive impact on the local economy (SA Objective 13).

B.7.5 Policy CEN5 – Proposals of Small-Scale Local Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN5	0	0	0	+	0	0	+	0	+	0	+	+	+	0

B.7.5.1 Policy CEN5 aims to support the development of small-scale centre-uses outside of centres to meet the needs of community, where such proposals meet a number of criteria outlined in the policy. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. The small-scale development proposals supported by the policy will be expected to have benefits to the local economy and the local population by encouraging community cohesion, social inclusion and ensuring residents have good access to essential services in close proximity to their homes. The policy will also seek to retain existing services. Therefore, a minor positive impact in regard to equality and the economy is identified (SA Objectives 11 and 13).

B.7.5.2 The policy will also seek to ensure proposals are located within walking distance of new or improved facilities. The policy will be likely to ensure good access, whilst encouraging active travel, and reduce reliance on private cars, with subsequent benefits to local air quality and GHG emissions. This could lead to a minor positive impact on climate change, transport and accessibility and health (SA Objectives 4, 7, 9 and 12).

B.7.6 Policy CEN6 – Edge-of-Centre and Out-of-Centre Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0

B.7.6.1 This policy will set out criteria for the development of edge-of-centre and out-of-centre proposals for centre uses. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy could potentially have benefits to the local economy, by encouraging development in centres which are highly sustainable locations. A minor positive impact on the economy is expected (SA Objective 13).

B.7.6.2 This policy will encourage development in centres which are likely to be highly sustainable locations, and will require all development proposals to be assessed for accessibility via public transport, walking and cycling. These measures will be expected to ensure all residents and visitors have safe access to these facilities. By supporting access via walking and cycling, this policy could potentially encourage active travel and facilitate healthy

lifestyles. By providing adequate access via public transport, there could potentially be a reduction in car use, with benefits to the climate, air pollution and congestion. Therefore, as the policy will prioritise development in centres, and assuming the assessments outlined in the policy would ensure sustainable access to out-of-centre developments is prioritised, this policy will be likely to have minor positive impacts in relation to climate change, air quality, transport and health (SA Objectives 4, 7, 9 and 12).

B.8 Transport

B.8.1 Policy TRAN1 – Priorities for the Development of the Transport Network and Policy TRAN2 – Safeguarding the Development of the Key Route Network

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN1 & TRAN2	0	0	0	+	0	0	+	0	++	0	0	+	0	0

B.8.1.1 Policy TRAN1 will outline the priorities for Wolverhampton’s transport network during the Plan period, covering a wide range of transport modes including the strategic road network, rail, rapid transit and interchanges. The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to reflect current key transport projects and investment plans of relevance to Wolverhampton whilst providing flexibility for changes which may occur in the lifetime of the WLP. This will include reference to current investment plans such as City Region Sustainable Transport Settlement (CRSTS), West Midlands Rail Strategy, and Bus Service Improvement Plan (BSIP), as well as to the emerging West Midlands Local Transport Plan (LTP) and the need to decarbonise transport in line with national and local targets.

B.8.1.2 For the WLP, Policy TRAN1 is proposed to be merged with Policy TRAN2, to clarify that development of the Key Route Network (KRN) is part of the development of the overall transport network.

B.8.1.3 New development within Wolverhampton as proposed within the WLP, as well as growth within neighbouring authorities in the West Midlands, will be expected to result in an increased number of vehicles on the local road network, adding more pressure to road infrastructure and travel corridors. An increased volume of traffic can have implications for a variety of issues such as congestion, road safety and air quality as well as resulting in longer journey times. The policy will seek to ensure that the West Midlands KRN is effectively managed in order to support the level of growth proposed in the WLP over the Plan period.

B.8.1.4 The transport projects identified within this policy will be expected to contribute towards improving the delivery of sustainable transport options, improving the integration of different modes of transport, reducing issues with congestion, and improving traffic flows. The policy will be expected to ensure that suitable mitigation measures are identified and put in place regarding any potential adverse impacts on the road network. Furthermore, the policy will help to ensure that transport connectivity is improved, through requiring liaison between CWC and Transport for West Midlands. The policy could potentially encourage coordination and streamlining of transport systems including public transport

such as rapid transit and bus routes. Overall, a major positive impact on transport is likely (SA Objective 9).

B.8.1.5 The policy is expected to ensure all modes of travel are promoted including walking, cycling and public transport. The promotion of active travel and public transport improvements within key transport corridors will be likely to encourage the uptake of sustainable transport and could potentially help to reduce reliance on travel via car. A modal shift away from private car use towards public transport and active travel would be expected to result in a reduction in transport-associated emission of GHGs and other air pollutants. Therefore, Policy TRAN1 could potentially result in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

B.8.1.6 Furthermore, by encouraging the uptake of active travel and ensuring development is accessible via walking and cycling, Policy TRAN1 could potentially improve the physical and mental wellbeing of residents. Ensuring that road safety and pedestrian access are considered when designing new development will be likely to encourage more people to choose these forms of travel, encouraging physical exercise and social interaction. A minor positive impact on health is therefore anticipated (SA Objective 12).

B.8.2 Policy TRAN3 – Managing Transport Impacts of New Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN3	0	0	0	0	0	0	0	0	+	0	0	0	0	0

B.8.2.1 Policy TRAN3 will set out the requirement for any development proposals which are likely to have adverse effects regarding transport to be accompanied by mitigation schemes to address accessibility and safety, in accordance with an agreed Transport Assessment. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. A minor positive impact on transport is anticipated (SA Objective 9).

B.8.3 Policy TRAN4 – The Efficient Movement of Freight

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

B.8.3.1 Policy TRAN4 will set out guidelines for the movement of freight, and the prioritisation of sustainable modes of transport where possible. The policy is not proposed to be changed

significantly compared to the version presented in the Draft BCP, other than to add wording in policy to promote more innovative freight modes and smaller logistics requirements with further detail in justification text.

B.8.3.2 Road transport is a major source of air pollution and GHG emissions in the UK⁷. Transporting freight via rail and waterways will be expected to result in lower emissions and higher energy efficiency compared to road transport using heavy goods vehicles (HGVs)⁸. By encouraging the movement of freight via rail and waterways, Policy TRAN4 could potentially help to relieve road congestion issues and result in more sustainable freight transport across the Plan area. Therefore, a minor positive impact on transport is identified (SA Objective 9).

B.8.3.3 Furthermore, this policy could potentially result in more cost-effective and efficient movement of freight, which would help to improve economic productivity. The proposed promotion of innovative freight modes within the WLP policy will also be likely to have benefits in this regard. As such, this policy could potentially result in a minor positive impact on the economy (SA Objective 13).

B.8.3.4 The policy will also support the use of waterways and existing and disused railway lines for freight transport. In Wolverhampton and the wider Black Country, canals and disused railway lines often form part of the ecological network in an otherwise heavily urbanised area, for example, the 'Wyrley and Essington Canal' and 'Staffordshire and Worcestershire Canal' Sites of Importance for Nature Conservation (SINCs), 'Shropshire Union Canal' Site of Local Importance for Nature Conservation (SLINC) and the 'Dudley to Priestfield Disused Railway' SLINC, amongst others. The conversion of these routes back into regular use for freight transport could potentially result in a minor negative impact on biodiversity through the increased disturbance of important wildlife corridors (SA Objective 3).

B.8.4 Policy TRAN5 – Creating Coherent Networks for Cycling and Walking

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0

B.8.4.1 Policy TRAN5 will seek to ensure that walking and cycling infrastructure networks are developed and maintained across the WLP area to encourage sustainable travel choices.

⁷ ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date accessed: 19/12/22]

⁸ Government Office for Science (2019) Understanding the UK freight transport system. Available at: <https://www.gov.uk/government/publications/future-of-mobility-the-uk-freight-transport-system> [Date accessed: 19/12/22]

The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.8.4.2 The policy will require the development of safe cycle and walking links and infrastructure such as cycle parking. These factors will be likely to encourage more people to consider cycling and walking as alternative forms of travel, reducing reliance on private car use. Therefore, a minor positive impact on transport is expected (SA Objective 9). This could also contribute towards a reduction in GHG emissions with benefits for local air quality, and as such, minor positive impacts have been identified for climate change mitigation and pollution (SA Objectives 4 and 7).

B.8.4.3 Furthermore, through facilitating active travel, this policy could potentially encourage outdoor exercise and result in benefits to mental and physical wellbeing. A minor positive impact on health will be likely (SA Objective 12).

B.8.5 Policy TRAN6 – Influencing the Demand for Travel and Travel Choices and Policy TRAN7 – Parking Management

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN6 & TRAN7	0	0	0	+	0	0	+	0	+	0	0	0	+	0

B.8.5.1 Policy TRAN6 will promote the holistic management of traffic across Wolverhampton and the wider area and seek to encourage a modal shift towards more sustainable travel options, in accordance with the Traffic Management Act 2004 (TMA). The aim of the TMA is to “*tackle congestion and disruption on the road network ... [and] places a duty on local authorities to make sure traffic moves freely and quickly*”⁹.

B.8.5.2 Policy TRAN6 is proposed to be merged with Policy TRAN7 for the WLP, which sets out the approach to parking management including the type, location and standards for parking in or near to town centres and will add reference to a fuller range of parking measures. The new combined policy will also be amended to reference innovative practices of influencing demand, including demand responsive transport and micro-mobility, and cross-reference zero emission vehicles in justification text.

B.8.5.3 By regulating the types of parking available in different locations, and ensuring these standards are applied consistently across the Plan area, the policy will be expected to encourage people to choose more sustainable travel modes where possible. The policy

⁹ Department for Transport (2022) Traffic management Act 2004 overview. Available at: <https://www.gov.uk/government/collections/traffic-management-act-2004-overview> [Date accessed: 19/12/22]

will also aim to ensure that the efficiency of traffic flows in and around town centres is improved. Overall, a minor positive impact on transport is anticipated (SA Objective 9).

B.8.5.4 Assuming the policy will seek to ensure that the type of parking is appropriate to the location, this could potentially help to support local shops and businesses and result in a minor positive impact on the economy (SA Objective 13).

B.8.5.5 This policy will be expected to encourage the development of better-connected public transport systems and deliver more widespread changes to the transport network. The promotion of public transport and active travel will be likely to reduce reliance on private car use and consequently reduce the emission of GHGs and other air pollutants. A minor positive impact could be achieved in relation to climate change mitigation and pollution (SA Objectives 4 and 7).

B.8.6 Policy TRAN8 – Planning for Low Emission Vehicles

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0

B.8.6.1 Policy TRAN8 will promote development proposals which support low emission vehicles (LEV). The term LEV can be used to refer to motorised vehicles which emit lower levels of emissions than traditional petrol- or diesel-powered cars or use low carbon technologies, including pure electric vehicles and plug-in hybrid vehicles¹⁰. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.8.6.2 This policy will help to encourage the use of LEVs within the WLP area, by ensuring the appropriate infrastructure such as electric vehicle charging points are incorporated within new developments and appropriate public locations. The policy will also encourage the exploration of alternative low emission vehicle technologies. Overall, these measures will be likely to result in a minor positive impact on sustainable transport (SA Objective 9). Furthermore, encouraging the use of LEVs could potentially help to reduce the emission of GHGs and other air pollutants, resulting in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

¹⁰ SMMT (2020) Ultra Low Emission Vehicles (ULEVs). Available at: <https://www.smmt.co.uk/industry-topics/technology-innovation/ultra-low-emission-vehicles-ulevs/> [Date accessed: 19/12/22]

B.9 Environmental Transformation

B.9.1 Policy ENV1 – Nature Conservation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0

B.9.1.1 Policy ENV1 will aim to protect, conserve and enhance biodiversity assets, from internationally designated to locally protected sites. The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to make clear the expectation that development should not harm species which are legally protected, in decline, rare or identified in Biodiversity Action Plans.

B.9.1.2 Furthermore, requirements will be added to the policy to ensure that where planning applications may affect any designated site or any important habitat, species or geological feature, they must include a data search from the Local Records Centre, and for a Local Sites Assessment to be submitted to the Local Sites Partnership where development is likely to impact upon a Site of Importance for Nature Conservation (SINC) or a Site of Local Importance for Nature Conservation (SLINC).

B.9.1.3 The policy will be expected to ensure that designated sites and important species and habitats are protected, and will require all future development to positively contribute to the local natural environment. Therefore, a major positive impact on biodiversity is expected (SA Objective 3).

B.9.1.4 Biodiversity assets, such as Local Nature Reserves (LNRs) and SINC, are often key features of local landscapes. By protecting and potentially enhancing biodiversity assets, it is likely that some key landscape features would also be protected and potentially enhanced, with benefits to local character and visual amenity. Therefore, this policy will be likely to have a minor positive impact on the local landscape (SA Objective 2).

B.9.1.5 Vegetation provides several ecosystem services to the Plan area, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation) and filtering air pollutants (pollution). The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance the provision of these essential ecosystem services. This policy could potentially result in minor positive impact on SA Objectives 4, 5 and 7.

B.9.1.6 The protection and enhancement of the natural environment will be likely to result in benefits to the health of local residents. Access to natural and diverse outdoor spaces is known to have benefits for mental wellbeing, whilst also encouraging physical activity and providing opportunities for community cohesion. These measures will therefore be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

B.9.2 Policy ENV2 – Development Affecting Special Areas of Conservation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0

- B.9.2.1 Policy ENV2 will set out CWC’s approach to the protection of Special Areas of Conservation (SACs), including Cannock Chase SAC, against future development. Any development within 15km of Cannock Chase SAC which would result in a net increase in residential units will be required to undertake an appropriate assessment under this policy. The appropriate assessment will indicate if the development would be likely to result in an adverse impact on the integrity of the SAC, and if so, the developer will be required to ensure sufficient measures are in place to avoid or mitigate the identified impact.
- B.9.2.2 The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to ensure that air quality modelling is carried out to determine the potential impact of traffic arising from WLP developments on the integrity of Fens Pools, Cannock Extension Canal and Cannock Chase SACs. If analysis shows that there will be likely significant effects (either alone or in combination with other plans), Natural England and relevant local authorities will be liaised with to develop policies which will mitigate these impacts.
- B.9.2.3 The requirements set out in Policy ENV2 will be expected to protect SACs from inappropriate development, and therefore, a major positive impact on biodiversity is likely (SA Objective 3).
- B.9.2.4 Future development which could potentially increase nitrous oxide (NO_x) deposition, and as such impact the integrity of a SAC, will be required to undertake an appropriate assessment, which may require developers to ensure sufficient measures are in place to avoid or mitigate the impact. This will be likely to conserve the integrity of SACs within and surrounding the WLP area, whilst also having a minor positive impact on pollution by helping to improve local air quality (SA Objective 7). Furthermore, the mitigation of impacts arising from NO_x deposition within this policy could potentially help to combat the causes of climate change, leading to a minor positive impact on SA Objective 4.
- B.9.2.5 Cannock Chase SAC is a popular tourist destination, with activities including mountain biking, camping and ‘Go Ape’ adventure park. Although the SAC itself is located some 11.5km to the north east of the Wolverhampton boundary, protecting the SAC from inappropriate development could potentially have benefits in relation to tourism in the wider area and have a minor positive impact on the local economy (SA Objective 13). Cannock Chase SAC and Fens Pools SAC also form part of the wider GI network, providing space for outdoor recreation and exercise for residents and visitors. By preserving and enhancing these sites, the policy could potentially have a minor positive impact on physical and mental health (SA Objective 12).

B.9.3 Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0

- B.9.3.1 Paragraph 174 of the NPPF¹¹ states that *"planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"*. Mandatory requirements for delivering at least 10% biodiversity net gain, maintained for at least 30 years, are expected to come into force in January 2024.
- B.9.3.2 Policy ENV3 will require all development to deliver a minimum of 10% biodiversity net gain as part of development proposals and is expected to ensure that all developments contribute towards the delivery of the emerging Local Nature Recovery Strategy (LNRS). The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to *"Ensure accordance with current national guidance and legislation and make clear that the Policy will relate to the emerging Black Country Local Nature Recovery Map and Strategy until the adoption of the West Midlands Combined Authority Local Nature Recovery Strategy, which will have a statutory role"*. The policy will also be updated to clarify that biodiversity net gain requirements are separate to protections for Habitats sites and irreplaceable habitats.
- B.9.3.3 Consequently, this policy will provide opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna, and as such, improve the biodiversity value of the Plan area. Therefore, this policy is expected to have a major positive impact on biodiversity (SA Objective 3).
- B.9.3.4 Biodiversity net gain could potentially contribute towards improved air quality due to the increased uptake of carbon dioxide and filtration of pollutants associated with road transport, which could potentially help to reduce residents' exposure to air pollution. Furthermore, due to this enhanced carbon storage capacity, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on climate change mitigation and pollution could therefore be achieved (SA Objectives 4 and 7).
- B.9.3.5 Increased biodiversity and green cover are likely to help reduce water runoff rates and as such, reduce the risk of both fluvial and surface water flooding. Improvements to the quality and quantity of the green network will also be likely to enhance natural water storage and flow functions. Connectivity between habitats, including stepping-stone habitats, is particularly important when considering global climatic trends as they provide

¹¹ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 12/12/23]

opportunities for the movement of species and adaptation to climate change. Overall, a minor positive impact on water and flooding is expected (SA Objective 5).

B.9.3.6 Enhanced biodiversity and green cover across the WLP area will be likely to have positive impact on residents’ wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. A minor positive impact on human health and wellbeing is therefore expected (SA Objective 12).

B.9.3.7 Furthermore, the enhancement of the green network could potentially provide opportunities to safeguard and improve the character and appearance of local landscapes and townscapes and create more pleasant outdoor spaces for both people and wildlife. This will be likely to result in a minor positive impact on the local landscape quality (SA Objective 2).

B.9.4 Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0

B.9.4.1 Policy ENV4 will aim to create, retain and protect trees, woodlands and hedgerows, including ancient trees, ancient woodlands and veteran trees across the Plan area. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.9.4.2 Where the loss of a tree is unavoidable, this policy will require the planting of three appropriate native trees in replacement of every tree lost. This policy will require an arboricultural survey to be carried out prior to removal of any vegetation or site groundworks. Ecological surveys will also be required to identify the ecological importance of hedgerows. These measures will be expected to help prevent the inappropriate loss of vegetation. The policy will also ensure that Tree Preservation Orders (TPOs) are used to protect individual or groups of trees that contribute to the character of the local area, and encourage habitat creation and biodiversity net gain. Trees, woodlands and hedgerows support a vast array of important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. Therefore, this policy will be likely to result in a minor positive impact on biodiversity (SA Objective 3).

B.9.4.3 The retention and enhancement of trees and woodland supported under this policy will be likely to boost the natural carbon sink and air filtration ecosystem services provided by trees and vegetation. This could also potentially help to reduce residents’ exposure to air pollution, for example through the filtration or buffering of emissions associated with road transport. Furthermore, due to the enhanced carbon storage capacity tree planting would provide, this policy could potentially help to mitigate anthropogenic climate change. A

minor positive impact on the climate change mitigation and pollution objectives area therefore identified (SA Objectives 4 and 7). These measures could also help to improve the respiratory health of residents and provide opportunities for integrating green spaces amongst development for recreation. Access to a diverse range of natural habitats is also expected to benefit mental wellbeing. Therefore, a minor positive impact is also expected in terms of human health (SA Objective 12).

B.9.4.4 Trees serve an important role in protecting soil from erosion as a result of rainfall and surface water runoff, due to the stabilisation provided by roots and interception of rainfall by foliage. Through conserving and enhancing tree coverage across the Plan area, this policy will be likely to help preserve soils and have a minor positive impact on natural resources (SA Objective 6). By reducing water runoff rates this will also be expected to enhance natural water storage and help to reduce the risk of fluvial and surface water flooding, with a minor positive impact on climate change adaptation (SA Objective 5).

B.9.4.5 Furthermore, trees, woodlands and hedgerows can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or enhancing views, or providing visual interest. Additionally, the protection of ancient and veteran trees, hedgerow and woodland will likely help to protect and enhance historic character. Therefore, this policy could potentially result in minor positive impact to cultural heritage and the local landscape (SA Objectives 1 and 2).

B.9.5 Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0

B.9.5.1 Policy ENV5 is expected to help ensure that heritage assets are conserved in a manner appropriate to their significance, in line with national policy, and that the setting and special character of heritage assets are not adversely impacted by development. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.9.5.2 Where development proposals could potentially affect the significance of a heritage asset, this policy will require an accompanying statement to be produced, to ensure that the impact can be adequately assessed. The policy will seek to enrich the historic environment, by requiring development proposals to enhance local distinctiveness, retain and enhance built assets and their settings, historic townscape value and archaeological potential. Overall, this policy will be likely to have a major positive impact on cultural heritage (SA Objective 1).

- B.9.5.3** It is assumed that the policy will ensure the scale and design of new development will be informed by consideration of the local character and distinctiveness, which would be expected to benefit the character, appearance and distinctiveness of local landscapes and townscapes. This policy will help to protect and enhance urban landscape features and encourage the appropriate re-use of historic buildings, and therefore, have a minor positive impact on the local landscape (SA Objective 2).
- B.9.5.4** Furthermore, the policy will ensure that development proposals have regard to locally distinctive features including public open spaces and local landmarks. This could potentially benefit the local community by encouraging a sense of belonging and promoting social inclusion, and therefore, a minor positive impact on equality is expected (SA Objective 11). Furthermore, the conservation and enhancement of heritage assets and historic townscapes can have benefits to the economy including through encouraging tourism and attracting investment¹². The policy could potentially result in a minor positive impact on the economy (SA Objective 13).
- B.9.5.5** Policy ENV5 will also be expected to promote the conservation and enhancement of geologically significant sites within the UNESCO Black Country Geopark; therefore, a minor positive impact on biodiversity and geodiversity could be expected (SA Objective 3).

B.9.6 Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+

- B.9.6.1** Policy ENV6 will help to protect and enhance geodiversity sites across the WLP area. Of particular importance is the Black Country UNESCO Global Geopark. Development proposals which could potentially result in an adverse impact on geodiversity sites of international or national importance will be resisted. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy will be likely to have a minor positive impact on local geodiversity (SA Objective 3).
- B.9.6.2** Sites of geological importance are often strongly linked to the surrounding local landscape and historic features, including Wolverhampton’s, and the wider Black Country’s, industrial heritage. By protecting the local geodiversity, this policy will also be expected to have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

¹² Historic England (2020) Heritage and the Economy 2020. Available at: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/> [Date accessed: 21/11/23]

B.9.6.3 The protection and enhancement of geologically important sites including the UNESCO Global Geopark is likely to have benefits to tourism in the area, and therefore, have a minor positive impact on the local economy (SA Objective 13). Furthermore, sustainable tourism, outdoor learning and education are major themes of the Geopark¹³. As such, Policy ENV6 could potentially have a minor positive impact on education (SA Objective 14).

B.9.7 Policy ENV7 – Canals

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0

B.9.7.1 Policy ENV7 will aim to protect and enhance Wolverhampton’s canal network. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. The policy will require all development proposals to safeguard the functional waterways and encourage reinstating and/or upgrading towpaths and link them into high-quality, wider pedestrian and cycle networks. This will be expected to ensure the canal network remains functional across the Plan area, with minor positive impacts in regard to transport and accessibility (SA Objective 9). Furthermore, enhancing the canal towpath network for use by pedestrians and cyclists could potentially encourage outdoor exercise and active travel, resulting in a minor positive impact on physical and mental health (SA Objective 12).

B.9.7.2 Policy ENV7 will also require development proposals to protect and enhance the special historic, architectural, archaeological and cultural significance of the canal network, as well as recognise the nature conservation value. Furthermore, development proposals will be required to consider the visual amenity of developments in proximity to the canal network. These requirements are likely to result in minor positive impacts in relation to cultural heritage, landscape, biodiversity and pollution (SA Objectives 1, 2, 3 and 7).

B.9.7.3 The policy will also seek to ensure that where the opportunity exists, future development should aim to improve leisure, recreation and tourism activities. This will be likely to have a minor positive impact on the local economy (SA Objective 13).

B.9.7.4 This policy will support the development of residential moorings within the WLP area, which could potentially have a minor positive impact on the overall provision of accommodation (SA Objective 10).

¹³ Black Country Geopark (2021) Black Country Geopark – Education, Events & Sustainable Tourism. Available at: <https://blackcountrygeopark.dudley.gov.uk/education/> [Date accessed: 21/11/23]

B.9.8 Policy ENV8 – Open Space, Sport and Recreation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0

B.9.8.1 Policy ENV8 will seek to ensure that open space, sport and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents.

B.9.8.2 The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to separate out the playing field and built sports facility elements of Policy ENV8 and justification text into the following new policy which reflects national guidance and Sport England best practice:

B.9.8.3 *“Existing playing fields and built sports facilities should be retained unless:*

- 1) *an assessment has been undertaken that has clearly shown the playing fields or built sports facilities to be surplus to requirements (for the existing or alternative sports provision) at the local and sub-regional level; or*
- 2) *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- 3) *the development is for alternative sports provision, the benefits of which clearly outweigh the loss of the current or former use; or*
- 4) *The proposed development affects only land incapable of forming part of a playing pitch and would not prejudice the use of any playing pitch or remaining areas of playing field on the site.*

B.9.8.4 *New built sports facilities should be:*

- 1) *demonstrated to accord with identified needs to ensure provision of appropriate facilities in a suitable location to meet that need;*
- 2) *well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities; and*
- 3) *well-linked to public transport infrastructure and footpath and cycleway networks and directed to a centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside centres must be justified in terms of relevant national policy.”*

B.9.8.5 Open space has multiple benefits within an area. This includes physical and mental health benefits associated with residents’ access to a diverse range of natural habitats, alongside the facilitation of outdoor recreation.

B.9.8.6 Access to sports, recreation and leisure facilities is essential for residents to be able to pursue healthy and active lifestyles. This policy will support the development of new sports facilities within the Plan area, in accordance with identified needs and with reference to the Wolverhampton Playing Pitch Strategy (2022). This policy will ensure current playing fields and built sports facilities are retained, unless there is clear justification that they are

surplus to requirements, as well as contribute to the development of new facilities and ensure residents have good access to outdoor space. Therefore, this policy will be likely to have a major positive impact on the health and wellbeing of residents (SA Objective 12). This policy also encourages the developments to ensure links are provided to public transport infrastructure, footpaths and cycle networks, with benefits to local accessibility (SA Objective 9).

B.9.8.7 Furthermore, through ensuring new built sports facilities have good access, and are “*well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities*” this policy could potentially help to fill gaps in accessibility for vulnerable or disadvantaged groups. Therefore, a minor positive impact on equality is identified (SA Objective 11).

B.9.8.8 Open space is beneficial to the local biodiversity network by providing an increased number of natural habitats and the opportunity to create green links within urban areas. This could also benefit the local landscape by creating attractive open spaces within the area. This policy will aim to improve the public realm and incorporate high quality landscaping, which has potential to contribute towards the preservation and enhancement of archaeological heritage and diversity in the natural and built environment. As a result, it is expected that this policy will have a minor positive impact on local cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).

B.9.8.9 Potential new or enhanced open spaces, and associated GI, would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide. Due to this enhanced carbon storage capacity, this policy could potentially contribute towards the mitigation of anthropogenic climate change. GI could also potentially provide natural filtration to reduce residents’ exposure to air pollution, for example from emissions associated with road transport. Furthermore, this policy will place focus on ensuring sports facilities are accessible via sustainable methods, which will help to reduce reliance on private car use. A minor positive impact on climate change and pollution will therefore be expected (SA Objectives 4 and 7). Enhanced open space and GI could also potentially help to reduce water runoff rates, and as such, have a minor positive impact by reducing the risk of flooding (SA Objective 5).

B.9.9 Policy ENV9 – Design Quality

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0

B.9.9.1 Policy ENV9 will focus on ensuring high design quality, including implementation of the National Design Guide, and incorporation of various criteria including the ‘Building for a Healthy Life’ and ‘Manual for Streets’ principles, amongst others, to help ensure that new development is designed and constructed in a sustainable way. The policy is not proposed

to be changed significantly compared to the version presented in the Draft BCP, other than the incorporation of part 1a) of BCP Policy CC1 'Increasing Efficiency and Resilience' which states that:

- 1) *"Development should be designed to mitigate climate change impacts and provide adaptations that will help communities and individuals to continue to avoid or mitigate adverse effects on human health. Proposals for development will need to demonstrate how they have been designed to maximise resistance and resilience to climate change through addressing the following requirements: -
 - a) *Wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation and to reduce exposure to wind and other elements".**

- B.9.9.2 Effective design codes can help to ensure new developments are integrated effectively into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work.
- B.9.9.3 Encouraging new development to pursue high-quality design will help to ensure that new development does not have an adverse impact on any surrounding heritage assets. This policy will set out criteria to help ensure future development proposals protect Wolverhampton's townscapes and heritage assets. Therefore, a minor positive impact on the historic environment would be expected (SA Objective 1).
- B.9.9.4 The policy will require development proposals to create a strong sense of place and include high-quality landscaping. This is likely to result in a minor positive impact on the local landscape, by helping to ensure that future development does not adversely affect the existing landscape character and where appropriate, enhances visual amenity and sense of place in the area (SA Objective 2).
- B.9.9.5 This policy is expected to ensure that major developments contribute towards GI. This will be likely to deliver additional habitats for wildlife and present opportunities to better connect biodiversity features, with potential to have a minor positive impact on biodiversity (SA Objective 3). GI can also have benefits such as enhancing natural water storage and flow functions. In addition, this policy will be expected to promote the use of flood management, including Sustainable Drainage Systems (SuDS), with benefits for local surface water flooding issues. This will be likely to have a minor positive impact on climate change adaptation (SA Objective 5).
- B.9.9.6 This policy will be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design, and ensuring that *"Wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation"*. Therefore, a minor positive impact on climate change mitigation is expected (SA Objective 4).
- B.9.9.7 Future development must meet the water efficiency requirements as stated in the Building Regulations. Encouraging an efficient use of water and energy will be expected to have a minor positive impact on natural resources (SA Objective 6).
- B.9.9.8 The policy will also help to ensure that future development does not result in detrimental impacts on the living environment in regard to artificial lighting, vibrations, dust, fumes,

smell and noise. Urban greening encouraged within this policy will also be expected to help to buffer developments against these pollutants. These measures will be likely to have a minor positive impact in relation to pollution (SA Objective 7).

- B.9.9.9 By ensuring that development proposals follow the 'Manual for Streets', the policy will be likely to provide an attractive, safe and permeable movement network, leading to a minor positive impact for local accessibility (SA Objective 9).
- B.9.9.10 This policy will be likely to make a positive contribution towards reducing crime and fear of crime in the local area, which would be expected to create safe and cohesive communities and help to improve quality of life for residents. Furthermore, the policy will be likely to ensure sufficient internal space is provided, in line with the Nationally Described Space Standards¹⁴. An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. Residents with more space, and therefore better quality of life, are likely to be part of a more vibrant and interactive community, and as such, benefits for the wellbeing of residents are likely. The policy will be likely to have a minor positive impact on equality and health (SA Objectives 11 and 12).

¹⁴ Ministry of Housing, Communities and Local Government (2015) Technical housing standards – nationally described space standards. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date accessed: 21/11/23]

B.10 Climate Change

B.10.1 Policy CC1 – Increasing Efficiency and Resilience

B.10.1.1 The aim of Draft BCP Policy CC1 was to ensure that development proposals seek opportunities for adaptation to, and mitigation of, climate change. The requirements of this policy are to be incorporated within other WLP policies, including Policy ENV9 (see **section B.9.9**), and so Policy CC1 is proposed to be deleted for the WLP, to remove unnecessary duplication.

B.10.2 Policy CC2 – Energy Infrastructure

B.10.2.1 The aim of Draft BCP Policy CC2 was to encourage the use of decentralised energy sources within development proposals and, where appropriate, the use of communal heating systems to reduce GHG emissions. For the WLP, this requirement is proposed to be added to Policy CC7 (see **section B.10.8**) and the remainder of Policy CC2 deleted in light of issues raised by Draft BCP consultation responses.

B.10.3 Policy CC3 – Managing Heat Risk

B.10.3.1 The aim of Draft BCP Policy CC3 was to ensure development proposals address heat risk, in terms of internal heat gain and the impacts of urban heat islands (UHIs), as well as promoting energy efficient designs and passive heating and cooling systems. Several of these principles are set out within other policies, and as such, Policy CC3 is proposed to be deleted in light of issues raised by Draft BCP consultation responses.

B.10.4 Policy CC4 – Air Quality

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0

B.10.4.1 Air pollution is a significant concern internationally and locally. The City of Wolverhampton is designated as an Air Quality Management Area (AQMA). Development within an AQMA would make it more difficult to meet national air quality objectives within the AQMA, whilst also exposing new residents to existing poor air quality.

B.10.4.2 Policy CC4 will require development proposals to promote the use of pedestrian and cycle routes, access to rail, the metro and bus transport networks, plus provide electric car charging points. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

- B.10.4.3** These measures will be expected to support a modal shift to the use of public transport and more sustainable travel options. In terms of air quality, electric vehicles are an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants. By discouraging the use of the private car, this policy will be expected to help reduce transport-associated emissions and have a positive impact on local air quality.
- B.10.4.4** Where a development proposal is situated in a location that does not currently meet national objectives, the policy will require an appropriate Air Quality Assessment (AQA) to be carried out to demonstrate that the proposed development will meet air quality objectives once the development is completed. Overall, the policy will be expected to have a major positive impact on air pollution (SA Objective 7).
- B.10.4.5** The requirements to be set out in Policy CC4 could potentially help to minimise the Plan area’s contributions to climate change by offering alternative, lower emission and more sustainable means of transport. A minor positive impact is therefore also be expected for climate change mitigation (SA Objective 4).
- B.10.4.6** As well as contributing towards the improvement of local air quality, encouraging the provision of sustainable transport methods and electric car charging points will be likely to have a minor positive impact on transport and accessibility (SA Objective 9).
- B.10.4.7** Policy CC4 will aim to encourage active travel by integrating pedestrian and cycle routes into development proposals. In addition, the policy will seek to increase the provision of green and open spaces across the WLP area. This will be likely to facilitate healthy lifestyles, through promoting outdoor exercise and benefiting mental wellbeing of residents. Overall, this policy is likely to have a minor positive impact in regard to human health (SA Objective 12).
- B.10.4.8** Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy will help to prevent deterioration of air quality and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 3).
- B.10.4.9** In addition, by seeking to ensure that development proposals are situated in a sustainable location to minimise commuter distance and time, this policy will be likely to situate residents in close proximity to a range of job opportunities, and therefore, have a minor positive impact on the local economy (SA Objective 13).

B.10.5 Policy CC5 – Flood Risk

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0

- B.10.5.1 Policy CC5 will seek to manage the risk of flooding throughout the Plan area and ensure that measures are in place within new developments to promote resilience to flooding. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.
- B.10.5.2 The policy will set out criteria requiring development proposals to carry out a Flood Risk Assessment and Surface Water Drainage Strategy. The Sequential Test will be applied to all development proposals to ensure that development takes place in areas with the lowest flood risk. This policy will be expected to ensure that all future development proposals do not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. In accordance with the policy, all development proposals should incorporate SuDS to help reduce the risk of surface water flooding and seek to provide wider flood risk betterment. Overall, a major positive impact on climate change adaption is anticipated (SA Objective 5).
- B.10.5.3 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies¹⁵. Providing new development which is flood resilient and results in flood risk betterment in surrounding areas will therefore be expected to have benefits to human health (SA Objective 12).
- B.10.5.4 Surface water run-off can lead to flooding and a decrease in water quality. The incorporation of SuDS into developments would be expected to benefit water quality, biodiversity and amenity interest through integration into the wider green and blue infrastructure networks and promoting natural management of flood water. Developments should, where possible, naturalise urban watercourses and open underground culverts, with likely benefits to biodiversity in terms of improving habitat connectivity and allowing natural filtration of pollutants. Therefore, Policy CC5 will be likely to have a minor positive impact on biodiversity and pollution (SA Objectives 3 and 7).

B.10.6 Proposed New Policy – Water Quality

- B.10.6.1 CWC propose to include a new policy for the WLP on water quality in line with Environment Agency advice, to address current River Basin Management Plan and Water Framework Directive priorities relevant to the Wolverhampton area, supported by updated Water Cycle Study evidence as required.
- B.10.6.2 Depending on the specific wording of the policy, which is not available at this stage, it is likely that this will lead to positive effects on the ecological and chemical status of watercourses (SA Objectives 3 and 6), improving flood resilience (SA Objective 5) and conserving natural resources (SA Objective 6), owing to the protection and enhancement of water quality in the WLP area.

¹⁵ Public Health England (2014) Flooding and the public's health: looking beyond the short-term. Available at: <https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/>
[Date accessed: 21/11/23]

B.10.7 Policy CC6 – Sustainable Drainage and Surface Water Management (SuDS)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0

B.10.7.1 Policy CC6 will set out guidelines for future development with respect to Sustainable Drainage and Surface Water Management. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.10.7.2 The policy would require developments to incorporate SuDS designed in line with the Black Country Local Standards for SuDS which will be anticipated to help reduce the risk of surface water flooding. The policy will further require surface water drainage strategies to be prepared for all major developments, to take into account all sources of flooding. This policy is expected to have a minor positive impact on climate change adaptation (SA Objective 5).

B.10.8 Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC7	0	0	0	+	+	0	+	0	0	0	0	+	0	0

B.10.8.1 Policy CC7 will promote on-site renewable or low carbon technologies incorporated within new development in Wolverhampton, which would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs emitted into the atmosphere. This in turn would reduce the Plan area’s contribution towards the causes of climate change. The policy would require all non-residential development of 1,000 sqm gross or more to be in accordance with the BREEAM New Construction Technical Standards¹⁶. The policy is expected to ensure that development proposals achieve full credits for category Wat 01 (water efficiency).

¹⁶ BREEAM (2018) New Construction Technical Standards. Available at: <https://www.breeam.com/discover/technical-standards/newconstruction/> [Date accessed: 21/11/23]

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- B.10.8.2 The policy is proposed to be amended compared to the version presented in the Draft BCP, to incorporate the requirement of BCP Policy CC2 to “*require all major developments to demonstrate that they will link into any existing decentralised energy network close to the site, or that this is not practical and viable, in the energy assessment*”.
- B.10.8.3 More efficient energy infrastructure will lead to a decrease in the amount of energy needed, and consequently, a decrease in GHG emissions released through the generation of energy. This policy will be likely to have a minor positive impact on climate change mitigation by helping to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources (SA Objective 4). By identifying and improving energy networks and considering future requirements, this policy could also potentially result in a minor positive impact on climate change adaptation (SA Objective 5).
- B.10.8.4 In addition, through improved energy efficiency, this policy will be likely to result in health benefits. This is due to a reduction in GHG emissions, which can cause poor air quality and impact human health, primarily due to particulate matter pollution. Therefore, this policy will be likely to have a minor positive impact in regard to pollution and human health (SA Objectives 7 and 12).
- B.10.8.5 The policy is also proposed to be amended to remove the requirement for all major developments to deliver a 19% carbon reduction improvement above Part L of Building Regulations, in light of changes to the Building Regulations which have introduced a higher improvement of c.31%, compared to the previous figure of 19%.

B.11 Waste

B.11.1 Policy W1 – Waste Infrastructure: Future Requirements

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0

B.11.1.1 Policy W1 will set out the strategy for waste management within the Plan area, as well as the levels of new waste management capacity likely to be needed to support the proposed growth across the Plan period. The policy is proposed to be amended compared to the version presented in the Draft BCP, to update waste figures to reflect Black Country Waste Study (2022), relate to Wolverhampton only, and cover a Plan period up to 2042.

B.11.1.2 Policy W1 will support the minimisation of waste production and re-use and recovery of materials, in accordance with the waste hierarchy, and help to ensure that there is sufficient capacity to accommodate forecast waste arisings as set out in the latest Waste Study. Overall, the policy will be expected to help reduce the volume of waste generated in the WLP area and improve the management and disposal of waste. Therefore, a major positive impact on waste is identified (SA Objective 8).

B.11.2 Policy W2 – Waste Sites

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0

B.11.2.1 The aim of Policy W2 is to safeguard and retain capacity of the existing waste facilities. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.11.2.2 The policy will be expected to ensure that housing proposals or sensitive land uses are not permitted in the vicinity of waste management sites where this could lead to conflicts. The policy will be likely to help ensure appropriate waste management continues in the WLP area and the wider Black Country and that capacity at these facilities does not decrease. Overall, a minor positive impact on waste is likely (SA Objective 8).

B.11.3 Policy W3 – Preferred Areas for New Waste Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0

B.11.3.1 Policy W3 will identify allocations for new waste management infrastructure. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.11.3.2 The provision of waste management facilities will be likely to have a major positive impact on waste by ensuring there are adequate facilities and capacity within Wolverhampton, and the wider Black Country, to effectively manage waste production (SA Objective 8).

B.11.3.3 At present, the scale and location of the proposed waste management facilities in unknown. Seeking to manage Wolverhampton’s waste rather than exporting to surrounding areas could potentially result in some benefits, although the likelihood and extent of these benefits are unknown. Overall, the likely impact in relation to environmental objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7 and 9).

B.11.3.4 The provision of waste management facilities will not be expected to significantly impact housing, equality, health, economy or education (SA Objectives 10, 11, 12, 13 and 14).

B.11.4 Policy W4 – Locational Considerations for New Waste Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0

B.11.4.1 Policy W4 will set out criteria to which new waste management facilities should be in accordance with. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.11.4.2 Waste management facilities will only be supported where there is an identified need for the facility. This will be likely to help fill any gaps in infrastructure and meet the locally identified waste management needs. A minor positive impact on waste is therefore expected (SA Objective 8).

B.11.4.3 The policy will ensure that consideration is given to potential impacts of the development on visual amenity, environmental and public health, noise and other disturbances when

allocating waste management facilities. These criteria will be expected to help prevent adverse impacts, and therefore, negligible impacts are identified in relation to landscape, biodiversity, human health, transport, flood risk and pollution (SA Objectives 2, 3, 5, 7, 9 and 12).

B.11.5 Policy W5 – Resource Management and New Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0

- B.11.5.1 Policy W5 will set out criteria for the sustainable management of waste and resources associated with new developments, during both construction and occupation. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.
- B.11.5.2 The policy will require all new developments to minimise waste, and maximise the use of secondary and recycled materials and locally sourced products wherever possible. This policy will be expected to promote sustainable and efficient waste management and use of materials across all new development in the WLP area and limit the generation of waste as much as is feasible. Furthermore, Policy W5 will help to ensure that development design takes into account the need for waste management, when occupied. Overall, a major positive impact on waste is expected (SA Objective 8).
- B.11.5.3 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, Policy W5 will be expected to result in a minor positive impact on natural resources (SA Objective 6).
- B.11.5.4 Policy W5 will also be expected to ensure that environmental impacts as a result of resource management and new development are minimised. The policy will encourage the use of materials with low environmental impacts and the management of waste either on-site or as close as possible to the source. These factors will be expected to minimise the potential for, and scale of, adverse impacts on the environment by reducing the distances travelled by waste management vehicles such as HGVs. Therefore, negligible impacts have been identified for landscape, biodiversity, pollution and transport (SA Objectives 2, 3, 7 and 9).

B.12 Minerals

B.12.1 Policy MIN1 – Minerals Production: Requirements

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0

B.12.1.1 Policy MIN1 will set out requirements for the production of construction aggregate and industrial minerals in the WLP area. The policy is proposed to be amended compared to the version presented in the Draft BCP, to clarify that primary mineral production in Wolverhampton is not available and remove references to Primary Land Won Sand and Gravel, Brick Clay Etruria Marl and fireclay, as reserves are not available in Wolverhampton.

B.12.1.2 The policy will be expected to help ensure the efficient use of mineral resources in the WLP area and promote use of recycled products to help reduce reliance on quarried products. This policy will be likely to have a minor positive impact on natural resources (SA Objective 6). This policy will also be expected to have a minor positive impact on the local economy, by supporting local construction and industrial businesses (SA Objective 13).

B.12.2 Policy MIN2 – Minerals Safeguarding

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0

B.12.2.1 Policy MIN2 is proposed to be amended compared to the version presented in the Draft BCP, to remove references to Mineral Safeguarding Areas (MSAs), as there are no MSAs in Wolverhampton. Instead, the policy will focus on ensuring that any mineral deposits that are identified as being of economic importance outside of MSAs are safeguarded from unnecessary sterilisation. The policy will help to ensure that development proposed in proximity to existing mineral sites or infrastructure do not result in unacceptable impacts on their continued operation. This policy will be expected to protect mineral resources and therefore have a minor positive impact on natural resources (SA Objective 6).

B.12.3 Policy MIN3 – Preferred Areas for New Minerals Development

B.12.3.1 The aim of Draft BCP Policy MIN3 was to identify areas for mineral extraction. The policy is proposed to be deleted for the WLP, as there is no potential for new mineral development in Wolverhampton.

B.12.4 Policy MIN4 – Managing the Effects of Mineral Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

B.12.4.1 Policy MIN4 is proposed to be amended compared to the version presented in the Draft BCP, to remove criteria relating to types of mineral development, for which there is no potential in Wolverhampton. Instead, the policy will focus on requirements for any mineral-related infrastructure to ensure that potential adverse effects on the environment, built and historic environment, pollution, transport and land use conflicts are addressed. Therefore, the policy is expected to ensure adverse effects are minimised, rather than introducing and positive effects. Negligible impacts are identified across all SA Objectives.

Appendix C – Reasonable Alternative Site Assessments

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C.1 Introduction

C.1.1 Overview

C.1.1.1 A total of 48 reasonable alternative sites have been identified by the City of Wolverhampton Council (CWC) within the Wolverhampton Local Plan (WLP) area (see **Table C.1.1**). This includes:

- 22 sites proposed for residential use;
- 25 sites proposed for employment use; and
- One site proposed for Gypsy and Traveller use.

C.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables C.2.1 – C.14.1** within each SA Objective chapter, in accordance with the topic-specific methodology set out in **Chapter 3** of the main SA Report.

C.1.1.3 This Regulation 18 SA Report has considered all reasonable alternative sites in the same way using the SA Framework, irrespective of their size or location. At this stage, the assessment has been carried out using the red line boundary and site proposal information provided by CWC, as set out in **Table C.1.1**. The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation.

C.1.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Council, as well as expert judgement.

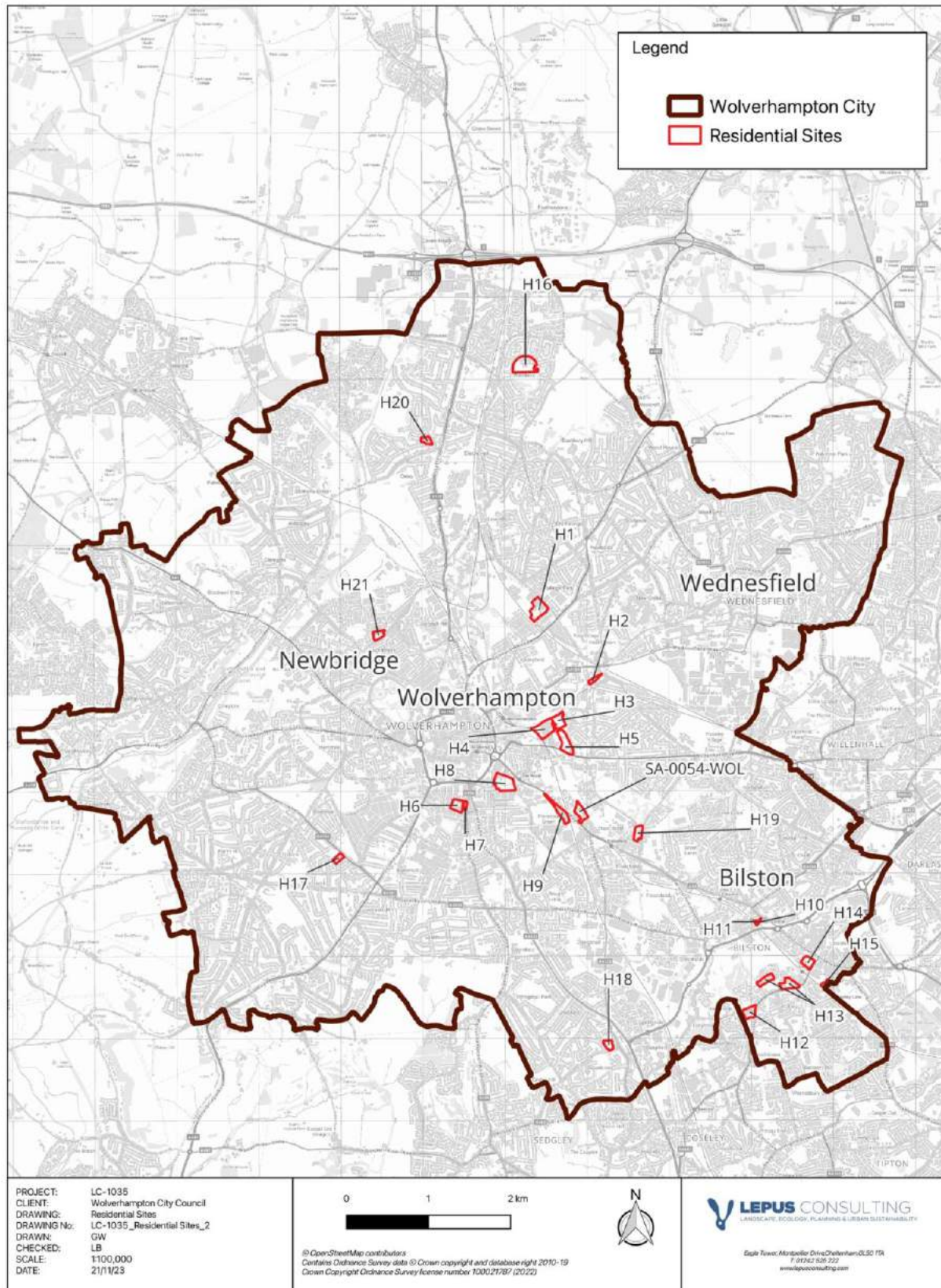


Figure C.1.1: Reasonable alternative sites proposed for residential use in Wolverhampton

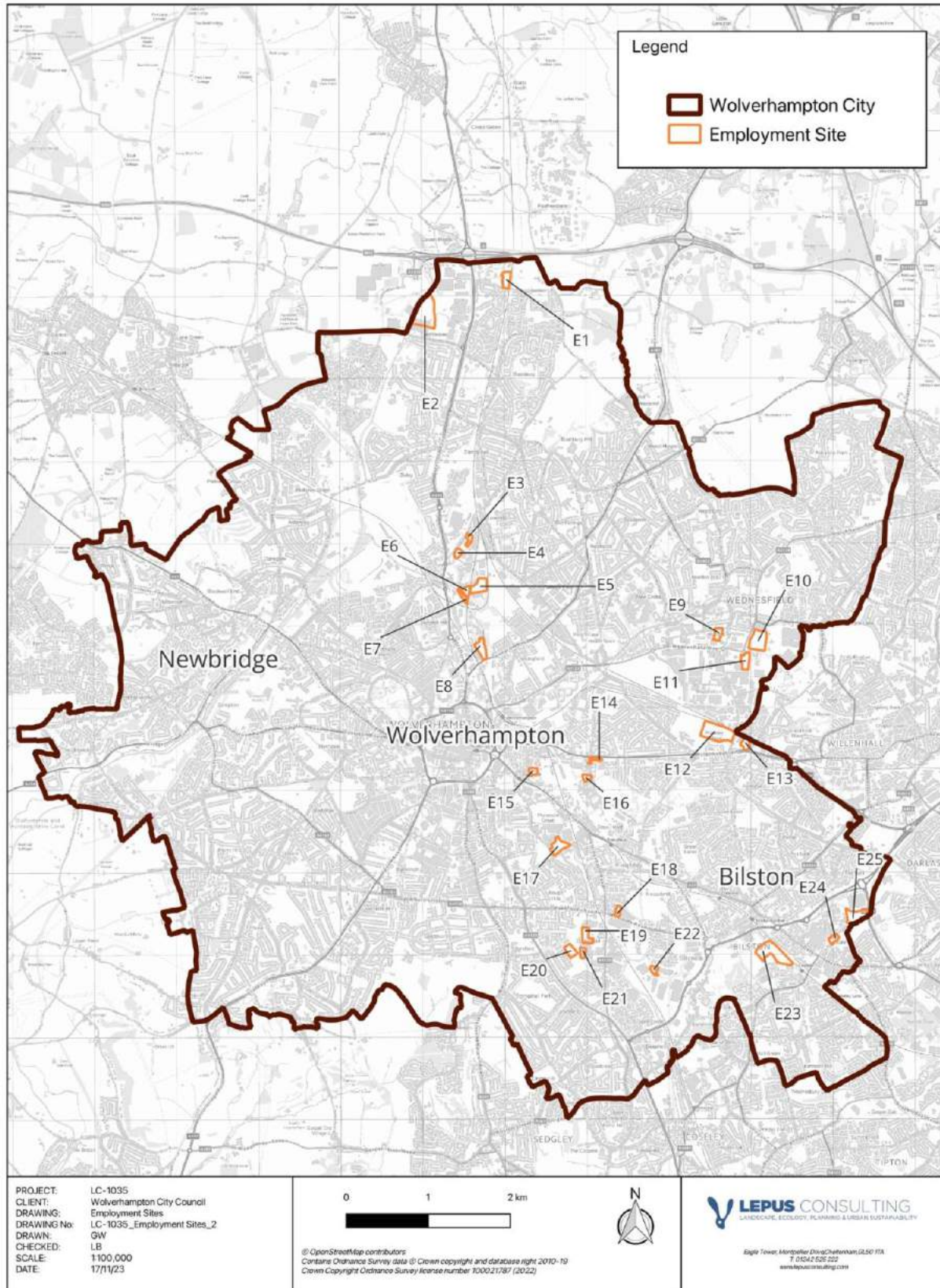


Figure C.1.2: Reasonable alternative sites proposed for employment use in Wolverhampton

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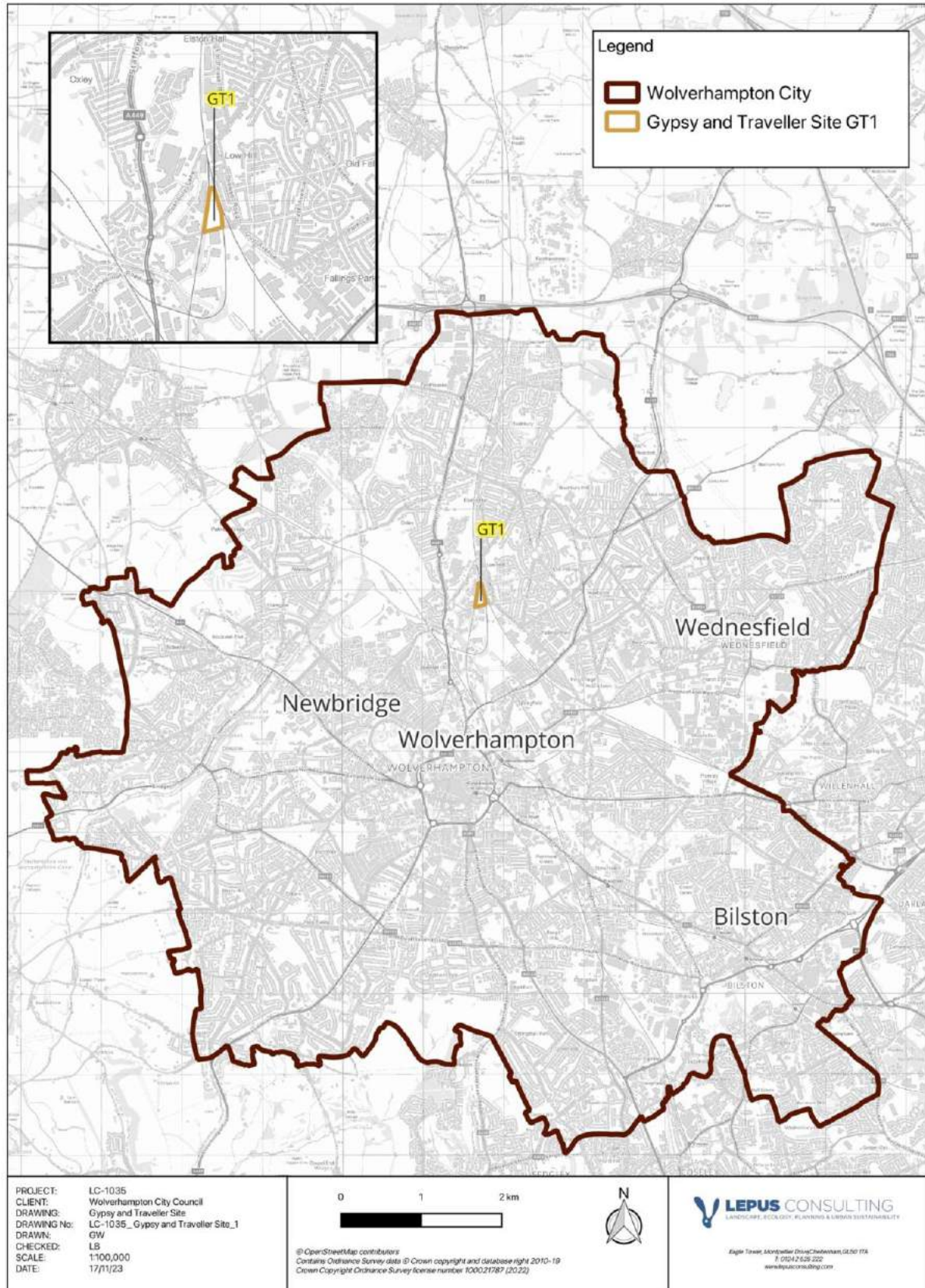


Figure C.1.3: Reasonable alternative sites proposed for Gypsy and Traveller use in Wolverhampton

Table C.1.1: Reasonable alternative sites in Wolverhampton

Site reference	Site address	Gross area (ha)	Site use	Housing capacity (if applicable)
H1	Blue Bird Industrial Estate and site to rear, Park Lane	3.10	Residential	130
H2	Former G & P Batteries Site, Grove Street, Heath Town	0.79	Residential	56
H3	East of Qualcast Road	2.00	Residential	101
H4	West of Qualcast Road	3.25	Residential	119
H5	West of Colliery Road	2.00	Residential	90
H6	Dobbs Street, Blakenhall	1.35	Residential	266
H7	Dudley Road / Bell Place, Blakenhall	0.68	Residential	100
H8	Former Royal Hospital, All Saints	4.11	Residential	192
H9	Delta Trading Estate, Bilston Road	2.00	Residential	80
H10	Land at Hall Street / The Orchard, Bilston Town Centre	0.12	Residential	21
H11	Former Pipe Hall, The Orchard, Bilston Town Centre	0.13	Residential	38
H12	Lane Street / Highfields Road, Bradley	1.79	Residential	72
H13	Greenway Road, Bradley	4.00	Residential	180
H14	Former Loxdale Primary School, Chapel Street, Bradley	1.30	Residential	100
H15	South of Oxford Street, Bilston	0.45	Residential	20
H16	Former Northicote Secondary School, Northwood Park Road	4.94	Residential	178
H17	Beckminster House, Beckminster Road	0.25	Residential	15
H18	Former Rookery Lodge, Woodcross Lane	0.25	Residential	16
H19	Former Stowheath centres. Stowheath Lane	1.00	Residential	53
H20	Former Probert Court / Health Centre, Probert Road	0.88	Residential	35
H21	Former Gym, Craddock Street	1.20	Residential	48
SA-0054-WOL	Sites at Sutherland Avenue / Cooper Street	1.50	Residential	100-150
E1	Wolverhampton Business Park	1.77	Employment	N/A
E2	Rear of IMI Marstons	7.20	Employment	N/A
E3	Shaw Road (north of Civic Amenity Site)	0.80	Employment	N/A
E4	Former Strykers, Bushbury Lane	0.80	Employment	N/A
E5	Gas Holder site, Wolverhampton Science Park	2.60	Employment	N/A
E6	Mammouth Drive, Wolverhampton Science Park	0.80	Employment	N/A
E7	Stratosphere Site, Wolverhampton Science Park	0.70	Employment	N/A
E8	Crown St/Cross St North	2.10	Employment	N/A
E9	Bentley Bridge Business Park, Well Lane, Wednesfield	1.20	Employment	N/A
E10	Tata Steel, Wednesfield	4.30	Employment	N/A
E11	Phoenix Road, Wednesfield	1.80	Employment	N/A

Site reference	Site address	Gross area (ha)	Site use	Housing capacity (if applicable)
E12	Land at Neachells lane	6.70	Employment	N/A
E13	Land rear of Key Line Builders, Neachells Lane / Moose Lane	1.20	Employment	N/A
E14	Chillington Fields	0.60	Employment	N/A
E15	Powerhouse, Commercial Road	0.90	Employment	N/A
E16	Hickman Avenue	0.70	Employment	N/A
E17	Former MEB Site, Major Street / Dixon Street	2.50	Employment	N/A
E18	Millfields Road, Ettingshall	0.70	Employment	N/A
E19	Rolls Royce Playing Fields, Spring Road	1.80	Employment	N/A
E20	South of Inverclyde Drive	1.40	Employment	N/A
E21	Rear of Spring Road	0.70	Employment	N/A
E22	Springvale Avenue	0.70	Employment	N/A
E23	Bilston Urban Village, Bath Street	6.00	Employment	N/A
E24	Dale St, Bilston	0.90	Employment	N/A
E25	South of Citadel Junction, Murdoch Road, Bilston	3.20	Employment	N/A
GT1	Former Bushbury Reservoir, Showell Road	0.30	Gypsy and Traveller	12 pitches

C.2 SA Objective 1: Cultural Heritage

C.2.1 Grade I Listed Buildings

C.2.1.1 There are two Grade I Listed Buildings in Wolverhampton, 'Wightwick Manor' and 'Church of St Peter'. All of the reasonable alternative sites in Wolverhampton would be unlikely to significantly impact either of the Grade I Listed Buildings, therefore a negligible impact has been identified for these sites.

C.2.2 Grade II* Listed Buildings

C.2.2.1 There is a relatively small number of Grade II* Listed Buildings within Wolverhampton, mostly concentrated in Wolverhampton city centre, with fewer located towards the outer edges of the city. All reasonable alternative sites within Wolverhampton are separated from Listed Buildings by existing built form and therefore are unlikely to significantly impact any Grade II* Listed Buildings. A negligible impact has been identified for these sites.

C.2.3 Grade II Listed Buildings

C.2.3.1 There are many Grade II Listed Buildings throughout Wolverhampton, generally clustered within the built-up areas and particularly within the city centre and Tettenhall, and along the canal network. Sites H08, H11 and H17 coincide with Grade II Listed Buildings 'Royal Hospital', 'Top Cats Night Spot' and 'Beckminster House and Gateway' respectively. Despite the likely retention (and opportunities for sensitive redevelopment) of the Grade II Listed Buildings, in line with the precautionary principle it is considered that the proposed development at these three sites could potentially have a direct major negative impact on these Grade II Listed Buildings. A further six reasonable alternative sites within Wolverhampton are either adjacent to or in close proximity to various Grade II Listed Buildings. The proposed development at these six sites could potentially have a minor negative impact on the settings of these Grade II Listed Buildings. The remaining reasonable alternative sites within Wolverhampton are likely to have a negligible impact on the setting of Grade II Listed Buildings, primarily due to being separated by existing built form.

C.2.4 Conservation Area

C.2.4.1 Wolverhampton contains 31 Conservation Areas (CAs), the majority of which cover sections of the urban area, as well as portions of the canal network and historic open spaces. The proposed development at the majority of the sites within Wolverhampton are unlikely to significantly impact any of these CAs, as the sites are separated from nearby CAs by existing built form. However, five sites are located wholly or partially within one of these CAs, including four residential sites (H8, H10, H11, H12) and one employment site (E15). Site H8 is located wholly within 'Cleveland Road' Conservation Area, Sites H10 and H11 are located wholly within 'Bilston Town Centre', Site H12 is partially located within 'Bilston Canal Corridor' and Site E15 is located wholly within the 'Bilston Canal Corridor' CA. A further 12 sites are located adjacent or in close proximity to a CA. Therefore, the

proposed development at these 17 sites could potentially result in a minor negative impact on the character or setting of CAs in Wolverhampton.

C.2.5 Scheduled Monument

C.2.5.1 There are four Scheduled Monuments (SMs) within Wolverhampton, all of which cover small historical features. All reasonable alternative sites are separated from nearby SMs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of SMs.

C.2.6 Registered Park and Garden

C.2.6.1 Two Registered Parks and Gardens (RPGs) can be found within Wolverhampton: 'West Park' and 'Wightwick Manor' RPGs. All reasonable alternative sites are separated from nearby RPGs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of RPGs.

C.2.7 Archaeological Priority Area

C.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Wolverhampton, mainly found in the urban areas. Four sites within Wolverhampton coincide wholly or partially with APAs (H10, H11, E10 and E16). The proposed development at these four sites could potentially alter the setting of APAs, and as a result have a minor negative impact on the historic environment. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.

C.2.8 Historic Landscape Characterisation

C.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study¹ has identified a range of Historic Environment Area Designations within the Black Country. In Wolverhampton, these designations are mainly restricted to the small parcels of Green Belt as well as a number of features within the urban areas.

C.2.8.2 Three reasonable alternative sites are located wholly or partially within an area of High Historic Landscape Value (HHLV) or High Historic Townscape Value (HHTV): Sites H1, H6, and H12. The proposed development at these three sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the local historic environment.

¹ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
[Date accessed: 04/01/24]

Table C.2.1: Sites impact matrix for SA Objective 1 – Cultural heritage

Site Use	Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
Residential	H1	0	0	0	0	0	0	0	-
Residential	H2	0	0	0	0	0	0	0	0
Residential	H3	0	0	0	-	0	0	0	0
Residential	H4	0	0	0	-	0	0	0	0
Residential	H5	0	0	0	-	0	0	0	0
Residential	H6	0	0	-	0	0	0	0	-
Residential	H7	0	0	0	0	0	0	0	0
Residential	H8	0	0	--	-	0	0	0	0
Residential	H9	0	0	0	-	0	0	0	0
Residential	H10	0	0	-	-	0	0	-	0
Residential	H11	0	0	--	-	0	0	-	0
Residential	H12	0	0	0	-	0	0	0	-
Residential	H13	0	0	0	-	0	0	0	0
Residential	H14	0	0	0	0	0	0	0	0
Residential	H15	0	0	0	0	0	0	0	0
Residential	H16	0	0	0	0	0	0	0	0
Residential	H17	0	0	--	0	0	0	0	0
Residential	H18	0	0	0	0	0	0	0	0
Residential	H19	0	0	0	0	0	0	0	0
Residential	H20	0	0	0	0	0	0	0	0
Residential	H21	0	0	0	0	0	0	0	0
Residential	SA-0054-WOL	0	0	0	0	0	0	0	0
Employment	E1	0	0	0	0	0	0	0	0
Employment	E2	0	0	0	-	0	0	0	0
Employment	E3	0	0	0	0	0	0	0	0
Employment	E4	0	0	0	0	0	0	0	0
Employment	E5	0	0	-	0	0	0	0	0
Employment	E6	0	0	-	-	0	0	0	0
Employment	E7	0	0	-	-	0	0	0	0
Employment	E8	0	0	-	-	0	0	0	0
Employment	E9	0	0	0	0	0	0	0	0
Employment	E10	0	0	0	0	0	0	-	0
Employment	E11	0	0	0	0	0	0	0	0
Employment	E12	0	0	0	0	0	0	0	0
Employment	E13	0	0	0	0	0	0	0	0
Employment	E14	0	0	0	0	0	0	0	0
Employment	E15	0	0	0	-	0	0	0	0
Employment	E16	0	0	0	0	0	0	-	0
Employment	E17	0	0	0	-	0	0	0	0

Site Use	Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
Employment	E18	0	0	0	-	0	0	0	0
Employment	E19	0	0	0	0	0	0	0	0
Employment	E20	0	0	0	0	0	0	0	0
Employment	E21	0	0	0	0	0	0	0	0
Employment	E22	0	0	0	0	0	0	0	0
Employment	E23	0	0	0	-	0	0	0	0
Employment	E24	0	0	0	0	0	0	0	0
Employment	E25	0	0	0	0	0	0	0	0
G&T	GT1	0	0	0	0	0	0	0	0

C.3 SA Objective 2: Landscape

C.3.1 Landscape Sensitivity

C.3.1.1 The Black Country Landscape Sensitivity Assessment² identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Wolverhampton, Green Belt is restricted mainly to the north and west, and alongside the Smestow Brook and the Staffordshire and Worcestershire Canal. All 48 reasonable alternative sites identified for the WLP lie outside of the Green Belt, and as such outside of the Landscape Sensitivity Assessment study area. Therefore, the potential effects of each site on sensitive landscapes are scored as uncertain.

C.3.1.2 Information relating to the historic environment which has strong links with landscapes/townscapes in Wolverhampton, including the Historic Landscape Characterisation and associated designations, has been assessed under SA Objective 1 (Cultural Heritage) (see **Chapter C.2**).

C.3.2 Alter Views for PRow Network Users

C.3.2.1 The PRow network in Wolverhampton is fragmented, with the majority of remaining footpaths found in the Green Belt parcels. The proposed development at six reasonable alternative sites (H2, H16, E5, E12, E25 and GT1), could potentially alter the views of open space currently experienced by users of the PRow network, and result in a minor negative impact on the landscape. Sites which contain existing development, or are separated from PRows by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

C.3.3 Alter Views for Local Residents

C.3.3.1 The development proposed at a large proportion of sites in Wolverhampton are considered to have the potential to alter the views currently experienced by local residents primarily due to their location with respect to existing residential zones. Therefore, a minor negative impact on the local landscape could be expected at these 22 sites. The remaining sites comprise previously developed land and/or are located away from existing residential zones; therefore, the proposed development at these sites would be unlikely to result in a significant impact on views.

² LUC (2019) Black Country Landscape Sensitivity Assessment. Available at:
https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 12/01/24]

Table C.3.1: Sites impact matrix for SA Objective 2 – Landscape

Site Use	Site Ref	Landscape Sensitivity Assessment ^t	Alter Views for PRoW Network Users	Alter Views for Local Residents
Residential	H1	+/-	0	0
Residential	H2	+/-	-	-
Residential	H3	+/-	0	-
Residential	H4	+/-	0	0
Residential	H5	+/-	0	0
Residential	H6	+/-	0	0
Residential	H7	+/-	0	0
Residential	H8	+/-	0	-
Residential	H9	+/-	0	0
Residential	H10	+/-	0	0
Residential	H11	+/-	0	0
Residential	H12	+/-	0	0
Residential	H13	+/-	0	0
Residential	H14	+/-	0	-
Residential	H15	+/-	0	0
Residential	H16	+/-	-	-
Residential	H17	+/-	0	-
Residential	H18	+/-	0	-
Residential	H19	+/-	0	-
Residential	H20	+/-	0	-
Residential	H21	+/-	0	-
Residential	SA-0054-WOL	+/-	0	0
Employment	E1	+/-	0	-
Employment	E2	+/-	0	0
Employment	E3	+/-	0	0
Employment	E4	+/-	0	-
Employment	E5	+/-	-	0
Employment	E6	+/-	0	0
Employment	E7	+/-	0	0
Employment	E8	+/-	0	0
Employment	E9	+/-	0	-
Employment	E10	+/-	0	0
Employment	E11	+/-	0	0
Employment	E12	+/-	-	-
Employment	E13	+/-	0	-
Employment	E14	+/-	0	-
Employment	E15	+/-	0	0
Employment	E16	+/-	0	0
Employment	E17	+/-	0	-
Employment	E18	+/-	0	0
Employment	E19	+/-	0	-
Employment	E20	+/-	0	0
Employment	E21	+/-	0	0

Site Use	Site Ref	Landscape Sensitivity Assessment ^t	Alter Views for PRoW Network Users	Alter Views for Local Residents
Employment	E22	+/-	0	-
Employment	E23	+/-	0	-
Employment	E24	+/-	0	0
Employment	E25	+/-	-	-
G&T	GT1	+/-	-	-

C.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

C.4.1 Habitats Sites

C.4.1.1 Habitats sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no Habitats sites located within Wolverhampton, with the nearest being 'Fens Pools' SAC located approximately 5km to the south of the city, and 'Cannock Chase' SAC located approximately 12km to the north east. A small proportion in the north of the city lies within the identified 15km Zone of Influence (ZoI) where recreational impacts to Cannock Chase SAC may arise as a result of new development. No ZoI has currently been identified for Fens Pools SAC or other surrounding Habitats sites.

C.4.1.2 Within Wolverhampton, two sites proposed for residential use (Site H16 and H20) are located within the 15km ZoI for recreational impacts at Cannock Chase SAC, and therefore, the proposed development at these sites could potentially have a minor negative impact on the designated features of this Habitats site. At the time of writing, the likely impact of development at the remaining sites on other Habitats sites, including Fens Pools SAC, is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

C.4.2 Sites of Special Scientific Interest

C.4.2.1 There are no Sites of Special Scientific Interest (SSSI) within Wolverhampton, with the nearest being 'Wren's Nest' SSSI located approximately 1.4km south of the city in Dudley.

C.4.2.2 Within Wolverhampton, one site proposed for residential use (H16) is located within an IRZ which states that "*Strategic solutions for recreational impacts are in place. Please contact your Local Planning Authority as they have the information to advise on specific requirements*". Therefore, the proposed development at Site H16 could potentially have a minor negative impact on nearby SSSIs (the SSSI components of Cannock Chase SAC) and Natural England should be consulted. The remaining sites within Wolverhampton are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.

C.4.3 National Nature Reserves

C.4.3.1 There are no National Nature Reserves (NNR) within Wolverhampton City, with the nearest being 'Wren's Nest' NNR located approximately 1.4km south of the city in Dudley. There are no sites within Wolverhampton located within close proximity to this NNR, and therefore the proposed development at all sites within Wolverhampton would be expected to have a negligible impact.

C.4.4 Ancient Woodland

- C.4.4.1 There are four areas of ancient woodland within Wolverhampton: 'Tettenhall Wood', 'Ashen Coppice', 'Park Coppice' and one unnamed stand of woodland, all of which are found in the south west of the city. All reasonable alternative sites within Wolverhampton are not in close proximity to any areas of ancient woodland, and therefore a negligible impact is identified.

C.4.5 Local Nature Reserves

- C.4.5.1 Within Wolverhampton, there are two Local Nature Reserves (LNRs): 'Smestow Valley' and the more recently adopted 'Wyrley and Essington Canal' LNR. Other nearby LNRs include 'Waddens Brook, Noose Lane' LNR which is located adjacent to the north eastern city boundary, in Walsall. Sites H2, H3, H4, and H5 are all located adjacent to the 'Wyrley and Essington Canal' LNR. Development at these four sites could potentially have a minor negative impact on the LNR. All of the remaining reasonable alternative sites in Wolverhampton are deemed unlikely to significantly impact these LNRs, primarily due to being separated by existing built form.

C.4.6 Sites of Importance for Nature Conservation

- C.4.6.1 There are 43 Sites of Importance for Nature Conservation (SINCs) found throughout Wolverhampton, including 'Birmingham Canal, Wolverhampton Level' SINC which runs throughout the central city area. A small proportion of Site SA-0054-WOL coincides with 'Monmore Green Disused Railway' SINC. A small proportion of Site E17 coincides with 'Birmingham Canal, Wolverhampton Level' SINC. The proposed development at these two sites could potentially have direct major negative impacts on these SINCs.
- C.4.6.2 Additionally, 11 sites are located adjacent to SINCs. Sites H9, E7, E8, E15 and E18 are located adjacent to the 'Birmingham Canal, Wolverhampton Level' SINC which runs through the centre of Wolverhampton. Sites H2, H3, H4, H5, H13, and E2 are also located adjacent to SINCs, including the 'Birmingham Canal, Wednesbury Oak Loop', 'Staffordshire and Worcestershire Canal' and the 'Wyrley and Essington Canal' SINCs. The proposed development at these 11 sites could potentially have a minor negative impact on the SINCs, due to an increased risk of development related threats and pressures.

C.4.7 Sites of Local Importance for Nature Conservation

- C.4.7.1 A total of 58 Sites of Local Importance for Nature Conservation (SLINCs) can be found throughout Wolverhampton, many of which comprise semi-natural open spaces within the highly urbanised area.
- C.4.7.2 Three sites coincide with SLINCs, including Site E7 with 'Wolverhampton Science Park' SLINC, Site E12 with 'Neachells Lane Open Space' SLINC, and Site E25 with 'Land East of Dale Street' SLINC. Additionally, three sites are located adjacent to SLINCs: Site H12 is located adjacent to 'Dudley to Priestfield Disused Railway' SLINC, and Sites E20 and E21 are located adjacent to 'Taylor Road' SLINC. The proposed development at these six sites could potentially result in a minor negative impact on SLINCs, due to an increased risk of development related threats and pressures.

- C.4.7.3 Site GT1 coincides with 'Bushbury Junction Reservoir' SLINC; however, it is understood that this reservoir has since been landfilled. It is unknown whether this site is still of any importance for biodiversity; therefore, the impact of the proposed development at this site is uncertain.
- C.4.7.4 The remaining sites are located further away from SLINCs, and as such, the proposed development at these sites would be less likely to significantly impact any SLINC.

C.4.8 Geological Sites

- C.4.8.1 Geological sites have been identified throughout the city, which form part of the Black Country Global Geopark³. These sites include a range of notable geological features and formations. In Wolverhampton, these include 'Stafford Road Cutting SINC', 'Wightwick Manor and Smestow Valley' and 'Northcote Farm'. None of the reasonable alternative sites in Wolverhampton are located in close proximity to any identified areas of geological importance, and therefore, the proposed development at all sites would be expected to have a negligible impact.

C.4.9 Priority Habitats

- C.4.9.1 Despite being largely urbanised, there are some sections of priority habitats present within Wolverhampton, with 'deciduous woodland' in particular found along the canals, as well as 'coastal and floodplain grazing marsh' alongside the Smestow Brook, with a smaller proportion of 'good quality semi-improved grassland' in the north east.
- C.4.9.2 Sites E1, E2, E5 and E23 coincide with areas of priority habitat, including coastal and floodplain grazing marsh and/or deciduous woodland. The proposed development at these four sites could potentially result in the loss or degradation of these habitats, and therefore result in a minor negative impact on the overall presence of priority habitats across the Plan area. The sites which do not coincide with any identified priority habitat are likely to have a negligible impact.

³ Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/>
[Date accessed: 04/01/24]

Table C.4.1: Sites impact matrix for SA Objective 3 – Biodiversity, flora, fauna and geodiversity

Site Use	Site Ref	Habitats Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
Residential	H1	+/-	0	0	0	0	0	0	0	0
Residential	H2	+/-	0	0	0	-	-	0	0	0
Residential	H3	+/-	0	0	0	-	-	0	0	0
Residential	H4	+/-	0	0	0	-	-	0	0	0
Residential	H5	+/-	0	0	0	-	-	0	0	0
Residential	H6	+/-	0	0	0	0	0	0	0	0
Residential	H7	+/-	0	0	0	0	0	0	0	0
Residential	H8	+/-	0	0	0	0	0	0	0	0
Residential	H9	+/-	0	0	0	0	-	0	0	0
Residential	H10	+/-	0	0	0	0	0	0	0	0
Residential	H11	+/-	0	0	0	0	0	0	0	0
Residential	H12	+/-	0	0	0	0	0	-	0	0
Residential	H13	+/-	0	0	0	0	-	0	0	0
Residential	H14	+/-	0	0	0	0	0	0	0	0
Residential	H15	+/-	0	0	0	0	0	0	0	0
Residential	H16	-	-	0	0	0	0	0	0	0
Residential	H17	+/-	0	0	0	0	0	0	0	0
Residential	H18	+/-	0	0	0	0	0	0	0	0
Residential	H19	+/-	0	0	0	0	0	0	0	0
Residential	H20	-	0	0	0	0	0	0	0	0
Residential	H21	+/-	0	0	0	0	0	0	0	0
Residential	SA-0054-WOL	+/-	0	0	0	0	--	0	0	0
Employment	E1	+/-	0	0	0	0	0	0	0	-
Employment	E2	+/-	0	0	0	0	-	0	0	-
Employment	E3	+/-	0	0	0	0	0	0	0	0
Employment	E4	+/-	0	0	0	0	0	0	0	0
Employment	E5	+/-	0	0	0	0	0	0	0	-
Employment	E6	+/-	0	0	0	0	0	0	0	0
Employment	E7	+/-	0	0	0	0	-	-	0	0
Employment	E8	+/-	0	0	0	0	-	0	0	0
Employment	E9	+/-	0	0	0	0	0	0	0	0
Employment	E10	+/-	0	0	0	0	0	0	0	0
Employment	E11	+/-	0	0	0	0	0	0	0	0
Employment	E12	+/-	0	0	0	0	0	-	0	0
Employment	E13	+/-	0	0	0	0	0	0	0	0
Employment	E14	+/-	0	0	0	0	0	0	0	0
Employment	E15	+/-	0	0	0	0	-	0	0	0
Employment	E16	+/-	0	0	0	0	0	0	0	0
Employment	E17	+/-	0	0	0	0	--	0	0	0

Site Use	Site Ref	Habitats Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
Employment	E18	+/-	0	0	0	0	-	0	0	0
Employment	E19	+/-	0	0	0	0	0	0	0	0
Employment	E20	+/-	0	0	0	0	0	-	0	0
Employment	E21	+/-	0	0	0	0	0	-	0	0
Employment	E22	+/-	0	0	0	0	0	0	0	0
Employment	E23	+/-	0	0	0	0	0	0	0	-
Employment	E24	+/-	0	0	0	0	0	0	0	0
Employment	E25	+/-	0	0	0	0	0	-	0	0
G&T	GT1	+/-	0	0	0	0	0	+/-	0	0

C.5 SA Objective 4: Climate Change Mitigation

C.5.1 Potential Increase in Carbon Footprint

- C.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 37 sites are proposed for the development of 113 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution towards Wolverhampton’s total carbon emissions.
- C.5.1.2 Six sites are proposed for the development of 114 dwellings or more. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Wolverhampton’s total, by more than 0.1%. Therefore, a minor negative impact on Wolverhampton’s carbon emissions would be expected at these six sites.
- C.5.1.3 The housing capacity at Site SA-0054-WOL is identified as between 100-150, and therefore, the impact of the proposed development at the site is uncertain as the likely extent of carbon emissions is unknown.
- C.5.1.4 The carbon emissions likely to be generated as a result of employment-led development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present.
- C.5.1.5 The nature and design of Gypsy and Traveller pitches which could be developed is unknown at present. Therefore, potential increases in carbon emissions as a result of the construction and occupation of dwellings at Site GT1 is uncertain.

Table C.5.1: Sites impact matrix for SA Objective 4 – Climate change mitigation

Site Use	Site Ref	Potential Increase in Carbon Footprint
Residential	H1	-
Residential	H2	0
Residential	H3	0
Residential	H4	-
Residential	H5	0
Residential	H6	-
Residential	H7	0
Residential	H8	-
Residential	H9	0
Residential	H10	0
Residential	H11	0
Residential	H12	0
Residential	H13	-
Residential	H14	0
Residential	H15	0
Residential	H16	-

Site Use	Site Ref	Potential Increase in Carbon Footprint
Residential	H17	0
Residential	H18	0
Residential	H19	0
Residential	H20	0
Residential	H21	0
Residential	SA-0054-WOL	+/-
Employment	E1	+/-
Employment	E2	+/-
Employment	E3	+/-
Employment	E4	+/-
Employment	E5	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E8	+/-
Employment	E9	+/-
Employment	E10	+/-
Employment	E11	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E19	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

C.6 SA Objective 5: Climate Change Adaptation

C.6.1 Flood Zones

C.6.1.1 Flood Zones 2, 3a and 3b within Wolverhampton occur alongside the Smestow Brook in the west, the Waterhead Brook in the north and also a significant area in the south east of the city covering some existing residential areas, close to the River Tame and Walsall Canal.

C.6.1.2 Three sites (E2, E23, and E25) in Wolverhampton are located partially within Flood Zone 3a and/or 3b, and therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Wolverhampton. A small proportion of Site H19 is located within Flood Zone 2, and therefore, the proposed development at this site could potentially have a minor negative impact on flooding. The remaining sites which are located wholly within Flood Zone 1 would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

C.6.2 Indicative Flood Zone 3b

C.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen due to climate change, areas of which have been identified in the north and the south east of Wolverhampton. Three sites (E2, E23 and E25) partially coincide with Indicative Flood Zone 3b. Therefore, the proposed development at these sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Wolverhampton. All remaining sites which do not coincide with Indicative Flood Zone 3b may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

C.6.3 Surface Water Flood Risk

C.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. SWFR in Wolverhampton is prevalent, and in particular affects roads and pathways within the urban area. The proposed development at seven sites within Wolverhampton which coincide with areas of high SWFR could potentially have a major negative impact on flooding, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate surface water flood risk in surrounding locations. The proposed development at 27 sites in Wolverhampton which coincide with areas of low and/or medium SWFR could potentially have a minor negative impact on surface water flooding. The remaining sites which do not coincide with any significant areas of SWFR would be expected to have a negligible impact on surface water flooding.

Table C.6.1: Sites impact matrix for SA Objective 5 – Climate change adaptation

Site Use	Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
Residential	H1	+	0	--
Residential	H2	+	0	-
Residential	H3	+	0	-
Residential	H4	+	0	-
Residential	H5	+	0	-
Residential	H6	+	0	-
Residential	H7	+	0	0
Residential	H8	+	0	-
Residential	H9	+	0	0
Residential	H10	+	0	0
Residential	H11	+	0	0
Residential	H12	+	0	-
Residential	H13	+	0	--
Residential	H14	+	0	0
Residential	H15	+	0	-
Residential	H16	+	0	-
Residential	H17	+	0	0
Residential	H18	+	0	-
Residential	H19	-	0	-
Residential	H20	+	0	-
Residential	H21	+	0	-
Residential	SA-0054-WOL	+	0	-
Employment	E1	+	0	-
Employment	E2	--	--	-
Employment	E3	+	0	0
Employment	E4	+	0	0
Employment	E5	+	0	-
Employment	E6	+	0	-
Employment	E7	+	0	--
Employment	E8	+	0	-
Employment	E9	+	0	-
Employment	E10	+	0	--
Employment	E11	+	0	0
Employment	E12	+	0	-
Employment	E13	+	0	0
Employment	E14	+	0	-
Employment	E15	+	0	-
Employment	E16	+	0	0
Employment	E17	+	0	-
Employment	E18	+	0	-
Employment	E19	+	0	0
Employment	E20	+	0	0
Employment	E21	+	0	--
Employment	E22	+	0	-

Site Use	Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
Employment	E23	--	--	--
Employment	E24	+	0	0
Employment	E25	--	--	-
G&T	GT1	+	0	--

C.7 SA Objective 6: Natural Resources

C.7.1 Previously Undeveloped Land / Land with Environmental Value

- C.7.1.1 Wolverhampton is predominately urban with pockets of undeveloped land and greenspace scattered throughout the communities, including areas of Green Belt in the south and north west of the city.
- C.7.1.2 16 sites in Wolverhampton wholly comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.
- C.7.1.3 The majority of reasonable alternative sites in Wolverhampton wholly or partially comprise undeveloped land, and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at these 32 sites could potentially have a minor negative impact on natural resources due to the loss of previously undeveloped land and/or land with potential environmental value.

C.7.2 Agricultural Land Classification

- C.7.2.1 Within Wolverhampton, Agricultural Land Classification (ALC) indicates largely 'Urban' land, with some areas of Grade 2, 3 and 4 land found in the southern and northern sections of the city. ALC Grade 2, and potentially Grade 3, represents some of Wolverhampton's 'best and most versatile' (BMV) land.
- C.7.2.2 Site E1 is wholly located on Grade 3 land and the proposed development at this site could potentially lead to a small-scale loss of BMV land, therefore, a minor negative impact on natural resources is expected.
- C.7.2.3 31 reasonable alternative sites are located on areas of 'Urban' land, and therefore, the proposed development at these sites could potentially have a minor positive impact on natural resources as development at these sites would help to prevent the loss of BMV land across the Plan area.
- C.7.2.4 The proposed development at the 16 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

Table C.7.1: Sites impact matrix for SA Objective 6 – Natural resources

Site Use	Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
Residential	H1	+	0
Residential	H2	-	+
Residential	H3	-	+
Residential	H4	+	0
Residential	H5	+	0
Residential	H6	+	0
Residential	H7	+	0
Residential	H8	+	0
Residential	H9	-	+
Residential	H10	-	+
Residential	H11	+	0
Residential	H12	+	0
Residential	H13	+	0
Residential	H14	-	+
Residential	H15	-	+
Residential	H16	-	+
Residential	H17	-	+
Residential	H18	-	+
Residential	H19	-	+
Residential	H20	-	+
Residential	H21	-	+
Residential	SA-0054-WOL	+	0
Employment	E1	-	-
Employment	E2	-	+
Employment	E3	+	0
Employment	E4	-	+
Employment	E5	-	+
Employment	E6	-	+
Employment	E7	-	+
Employment	E8	-	+
Employment	E9	-	+
Employment	E10	+	0
Employment	E11	-	+
Employment	E12	-	+
Employment	E13	-	+
Employment	E14	-	+
Employment	E15	+	0
Employment	E16	-	+
Employment	E17	-	+
Employment	E18	+	0
Employment	E19	-	+
Employment	E20	+	0
Employment	E21	-	+
Employment	E22	-	+

Site Use	Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
Employment	E23	-	+
Employment	E24	+	0
Employment	E25	-	+
G&T	GT1	-	+

C.8 SA Objective 7: Pollution

C.8.1 Air Quality Management Area

C.8.1.1 Wolverhampton City is wholly designated as 'Wolverhampton Air Quality Management Area' (AQMA). All of the reasonable alternative sites within Wolverhampton are located wholly within this AQMA. Several of the sites are also located within 200m of neighbouring AQMAs including 'Walsall AQMA' to the east, 'Sandwell AQMA' to the south east and 'Dudley AQMA' to the south. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

C.8.2 Main Road

C.8.2.1 Wolverhampton contains many major roads, including a large ring road in the city centre, where several main roads meet such as the A41, A449 and A454. The M54 motorway passes adjacent to the city in the north. 30 sites are located partially or wholly within 200m of a major road, and therefore, the proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites. On the other hand, the proposed development at the remaining sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

C.8.3 Watercourse

C.8.3.1 Wolverhampton's watercourse network largely comprises the canal system, with fewer rivers/streams. Notable watercourses include the Smestow Brook, Waterhead Brook and the River Tame, as well as sections of the Staffordshire and Worcestershire Canal and Birmingham to Wolverhampton Canal. 12 sites coincide with or are located within 10m of various watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

C.8.3.2 Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location. At this stage, the potential effects of these 36 sites on water quality are uncertain and would depend upon implementation.

C.8.4 Groundwater Source Protection Zone

C.8.4.1 Source Protection Zones (SPZs) for groundwater within Wolverhampton are located to the west and covering a large area of the city. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. 12 sites in Wolverhampton are located wholly or partially within the total catchment (zone 3) of this SPZ. The proposed

development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources. The remaining sites do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

C.8.5 Potential Increase in Air Pollution

- C.8.5.1 10 sites are proposed for the development of 100 or more dwellings. The proposed development at these sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact is identified.
- C.8.5.2 12 sites are proposed for the development of between ten and 99 dwellings, and 14 sites are proposed for employment-led end use and comprise between one and 10ha. Therefore, the proposed development at these 26 sites could potentially have a minor negative impact on air pollution in the local area.
- C.8.5.3 11 sites are proposed for employment-led end use and comprise less than 1ha. The proposed development at these 11 sites would be expected to have a negligible impact on local air pollution.
- C.8.5.4 The nature and design of Gypsy and Traveller pitches which could be developed at each site is unknown at present. Therefore, potential increases in air pollution as a result of the construction and occupation of dwellings at Site GT1 is uncertain.

Table C.8.1: Sites impact matrix for SA Objective 7 – Pollution

Site Use	Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
Residential	H1	-	-	+/-	0	--
Residential	H2	-	-	-	0	-
Residential	H3	-	0	-	0	--
Residential	H4	-	-	-	0	--
Residential	H5	-	-	-	0	-
Residential	H6	-	-	+/-	0	--
Residential	H7	-	-	+/-	0	--
Residential	H8	-	-	+/-	0	--
Residential	H9	-	-	-	0	-
Residential	H10	-	-	+/-	0	-
Residential	H11	-	-	+/-	0	-
Residential	H12	-	0	+/-	0	-
Residential	H13	-	0	-	0	--
Residential	H14	-	-	+/-	0	--
Residential	H15	-	-	+/-	0	-
Residential	H16	-	0	+/-	-	--
Residential	H17	-	0	+/-	-	-

Site Use	Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
Residential	H18	-	-	+/-	0	-
Residential	H19	-	0	+/-	0	-
Residential	H20	-	-	+/-	-	-
Residential	H21	-	0	+/-	-	-
Residential	SA-0054-WOL	-	-	+/-	0	--
Employment	E1	-	-	+/-	-	-
Employment	E2	-	0	-	-	-
Employment	E3	-	0	+/-	-	0
Employment	E4	-	-	+/-	-	0
Employment	E5	-	0	+/-	-	-
Employment	E6	-	0	+/-	-	0
Employment	E7	-	-	-	-	0
Employment	E8	-	-	-	0	-
Employment	E9	-	-	+/-	0	-
Employment	E10	-	-	+/-	0	-
Employment	E11	-	-	+/-	0	-
Employment	E12	-	-	+/-	0	-
Employment	E13	-	-	+/-	0	-
Employment	E14	-	-	+/-	0	0
Employment	E15	-	-	-	0	0
Employment	E16	-	0	+/-	0	0
Employment	E17	-	0	-	0	-
Employment	E18	-	-	-	0	0
Employment	E19	-	-	+/-	0	-
Employment	E20	-	0	+/-	0	-
Employment	E21	-	0	+/-	0	0
Employment	E22	-	0	+/-	0	0
Employment	E23	-	-	+/-	0	-
Employment	E24	-	0	+/-	0	0
Employment	E25	-	-	+/-	0	-
G&T	GT1	-	0	+/-	-	+/-

C.9 SA Objective 8: Waste

C.9.1 Potential Increase in Household Waste Generation

- C.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. 15 sites are proposed for the development of 111 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- C.9.1.2 Six sites (H1, H4, H6, H8, H13, and H16) are proposed for the development of 111 dwellings or more. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- C.9.1.3 The housing capacity at Site SA-0054-WOL is identified as between 100-150, and therefore, the impact of the proposed development at the site is uncertain. However, the proposed development at this site would be expected to have a negative impact on household waste to some extent.
- C.9.1.4 The waste likely to be generated as a result of employment-led development is uncertain.
- C.9.1.5 The nature and design of Gypsy and Traveller pitches which could be developed at Site GT1 is unknown at present. Therefore, potential increases in household waste generation as a result of the construction and occupation of dwellings at Site GT1 is uncertain.

Table C.9.1: Sites impact matrix for SA Objective 8 – Waste

Site Use	Site Ref	Increase in household waste generation
Residential	H1	-
Residential	H2	0
Residential	H3	0
Residential	H4	-
Residential	H5	0
Residential	H6	-
Residential	H7	0
Residential	H8	-
Residential	H9	0
Residential	H10	0
Residential	H11	0
Residential	H12	0
Residential	H13	-
Residential	H14	0
Residential	H15	0
Residential	H16	-
Residential	H17	0
Residential	H18	0

Site Use	Site Ref	Increase in household waste generation
Residential	H19	0
Residential	H20	0
Residential	H21	0
Residential	SA-0054-WOL	+/-
Employment	E1	+/-
Employment	E2	+/-
Employment	E3	+/-
Employment	E4	+/-
Employment	E5	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E8	+/-
Employment	E9	+/-
Employment	E10	+/-
Employment	E11	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E19	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

C.10 SA Objective 9: Transport and Accessibility

C.10.1 Bus Stop

C.10.1.1 Throughout Wolverhampton, there are many bus stops which would be expected to provide good public transport access to the local and wider community, especially throughout the city centre. Site E22 is located wholly outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at this site could potentially have a minor negative impact on site end users' access to sustainable transport. The remaining 47 sites are largely located amongst existing settlements and are all situated within 400m of a bus stop; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport.

C.10.2 Railway Station

C.10.2.1 Wolverhampton Station is located in the city centre, providing access to rail services as well as the West Midlands Metro Line, of which there are six stations located in the south eastern area providing tram services towards Birmingham. Access to rail and metro services in the outer areas of the city is likely to be more restricted. 11 sites are situated wholly or partially outside of the sustainable distance of 2km from a station, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services. The remaining 37 sites are located within 2km of a railway station and are therefore identified as having a minor positive impact on access to rail services.

C.10.3 Pedestrian Access

C.10.3.1 Sites with good pedestrian access can be described as those with connections to existing pavements or pathways which are segregated from traffic use in the area, which is likely to be the case for most of the built-up areas of Wolverhampton. All of the reasonable alternative sites are well connected to the existing footpath network, and therefore, the proposed development at these 48 sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created.

C.10.4 Road Access

C.10.4.1 There are many major and minor roads which run through Wolverhampton allowing for good access for road traffic in the local area and nationally. All of the reasonable alternative sites in Wolverhampton are adjacent to existing roads, and therefore the proposed development at all sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility.

C.10.5 Pedestrian Access to Local Services

- C.10.5.1 Sustainable pedestrian access to local fresh food and services in Wolverhampton can be attributed to being within a 15-minute walking distance, according to accessibility modelling data. Within Wolverhampton, a total of 45 local services have been identified. The areas with the best pedestrian access to services are generally found towards the north west, with somewhat restricted access in the south east and in the outskirts of the city.
- C.10.5.2 20 sites are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure. Whereas 16 sites are identified to be within 10-minute walking distance and therefore, the proposed development at these sites would be expected to have a major positive impact on sustainable access to local services. 12 sites are identified to be within 15-minute walking distance and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to local services.

C.10.6 Public Transport Access to Local Services

- C.10.6.1 Accessibility modelling data shows that almost the entirety of Wolverhampton is located within a sustainable travel time of 15 minutes via public transport to local fresh food and services. The majority of sites meet these criteria. The proposed development at 31 sites which are located within a sustainable travel time of 10 minutes via public transport would be expected to have a major positive impact on the access of site end users to local services, based on existing infrastructure. 16 sites are located within a sustainable travel time of 15 minutes via public transport, and would be expected to have a minor positive impact on the access of site end users to local services.
- C.10.6.2 However, Site H19 is located outside of this sustainable travel time via public transport to these local services, and therefore, the proposed development at this site could potentially have a minor negative impact on transport and accessibility.

Table C.10.1: Sites impact matrix for SA Objective 9 – Transport and accessibility

Site Use	Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
Residential	H1	+	+	+	+	+	++
Residential	H2	+	+	+	+	++	++
Residential	H3	+	+	+	+	++	+
Residential	H4	+	+	+	+	++	+
Residential	H5	+	+	+	+	+	+
Residential	H6	+	+	+	+	++	++
Residential	H7	+	+	+	+	++	++
Residential	H8	+	+	+	+	++	++
Residential	H9	+	+	+	+	-	++
Residential	H10	+	+	+	+	++	++

Site Use	Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
Residential	H11	+	+	+	+	++	++
Residential	H12	+	+	+	+	-	+
Residential	H13	+	+	+	+	+	++
Residential	H14	+	+	+	+	+	++
Residential	H15	+	+	+	+	+	++
Residential	H16	+	-	+	+	++	++
Residential	H17	+	-	+	+	++	++
Residential	H18	+	+	+	+	-	+
Residential	H19	+	+	+	+	-	-
Residential	H20	+	-	+	+	++	++
Residential	H21	+	+	+	+	++	++
Residential	SA-0054-WOL	+	+	+	+	-	+
Employment	E1	+	-	+	+	-	+
Employment	E2	+	-	+	+	-	++
Employment	E3	+	-	+	+	+	++
Employment	E4	+	-	+	+	+	++
Employment	E5	+	+	+	+	-	++
Employment	E6	+	+	+	+	-	++
Employment	E7	+	+	+	+	+	++
Employment	E8	+	+	+	+	++	++
Employment	E9	+	-	+	+	++	++
Employment	E10	+	-	+	+	+	++
Employment	E11	+	-	+	+	-	++
Employment	E12	+	+	+	+	-	+
Employment	E13	+	+	+	+	+	++
Employment	E14	+	+	+	+	-	+
Employment	E15	+	+	+	+	+	++
Employment	E16	+	+	+	+	-	+
Employment	E17	+	+	+	+	-	+
Employment	E18	+	+	+	+	-	++
Employment	E19	+	+	+	+	-	+
Employment	E20	+	+	+	+	-	+
Employment	E21	+	+	+	+	-	+
Employment	E22	-	+	+	+	-	+
Employment	E23	+	+	+	+	++	++
Employment	E24	+	+	+	+	+	++
Employment	E25	+	+	+	+	++	+
G&T	GT1	+	-	+	+	-	++

C.11 SA Objective 10: Housing

C.11.1 Housing Provision

C.11.1.1 Residential-led development is likely to result in a net gain in housing. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision.

C.11.1.2 Site GT1 is proposed for the development of 12 Gypsy and Traveller pitches. The proposed development at this site would be expected to contribute towards meeting the accommodation needs of Gypsies and Travellers, and result in a minor positive impact on housing provision.

C.11.1.3 Employment-led sites in Wolverhampton would not be expected to result in a net change in housing provision and therefore a negligible impact has been identified for these sites.

Table C.11.1: Sites impact matrix for SA Objective 10 – Housing

Site Use	Site Ref	Housing Provision
Residential	H1	++
Residential	H2	+
Residential	H3	++
Residential	H4	++
Residential	H5	+
Residential	H6	++
Residential	H7	++
Residential	H8	++
Residential	H9	+
Residential	H10	+
Residential	H11	+
Residential	H12	+
Residential	H13	++
Residential	H14	++
Residential	H15	+
Residential	H16	++
Residential	H17	+
Residential	H18	+
Residential	H19	+
Residential	H20	+
Residential	H21	+
Residential	SA-0054-WOL	++
Employment	E1	0
Employment	E2	0
Employment	E3	0
Employment	E4	0

Site Use	Site Ref	Housing Provision
Employment	E5	0
Employment	E6	0
Employment	E7	0
Employment	E8	0
Employment	E9	0
Employment	E10	0
Employment	E11	0
Employment	E12	0
Employment	E13	0
Employment	E14	0
Employment	E15	0
Employment	E16	0
Employment	E17	0
Employment	E18	0
Employment	E19	0
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	0
Employment	E24	0
Employment	E25	0
G&T	GT1	+

C.12 SA Objective 11: Equality

C.12.1 Index of Multiple Deprivation

C.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England⁴. Out of 317 Local Authorities in England, Wolverhampton is ranked as the 24th most deprived⁵. Overall deprivation is relatively high, with 33 of the LSOAs in Wolverhampton ranked among the 10% most deprived in England. In general, the most deprived areas of Wolverhampton are those surrounding the city centre and particularly towards the north around Bushbury South and Low Hill.

C.12.1.2 24 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the majority of sites in Wolverhampton may have a negligible impact on equality.

C.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

Table C.12.1: Sites impact matrix for SA Objective 11 – Equality

Site Use	Site Ref	IMD 10% Most Deprived
Residential	H1	-
Residential	H2	-
Residential	H3	-
Residential	H4	-
Residential	H5	-
Residential	H6	-
Residential	H7	-
Residential	H8	-
Residential	H9	0
Residential	H10	-
Residential	H11	-
Residential	H12	-
Residential	H13	-
Residential	H14	-
Residential	H15	0

⁴ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 04/01/24]

⁵ Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.activeblackcountry.co.uk/insight-hub/data/communities/indices-of-multiple-deprivation-2019/> [Date accessed: 04/01/24]

Site Use	Site Ref	IMD 10% Most Deprived
Residential	H16	-
Residential	H17	0
Residential	H18	0
Residential	H19	0
Residential	H20	0
Residential	H21	0
Residential	SA-0054-WOL	0
Employment	E1	0
Employment	E2	0
Employment	E3	-
Employment	E4	-
Employment	E5	0
Employment	E6	0
Employment	E7	0
Employment	E8	0
Employment	E9	0
Employment	E10	0
Employment	E11	0
Employment	E12	0
Employment	E13	0
Employment	E14	-
Employment	E15	-
Employment	E16	-
Employment	E17	0
Employment	E18	-
Employment	E19	0
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	-
Employment	E24	-
Employment	E25	-
G&T	GT1	-

C.13 SA Objective 12: Health

C.13.1 NHS Hospital with Accident & Emergency Department

C.13.1.1 New Cross Hospital is located within Wolverhampton, to the north east, and provides an Accident and Emergency (A&E) department. Other nearby hospitals with A&E departments include Manor Hospital, situated approximately 3.7km to the east of the city, in Walsall. 46 sites are located within 5km of these hospitals and could therefore potentially have a minor positive impact on access to emergency healthcare due to being within a sustainable distance to the services. However, two sites (H12 and H18) are located over 5km from a hospital, and therefore the proposed development at these sites could potentially have a minor negative effect on access to emergency healthcare.

C.13.2 Pedestrian Access to GP Surgery

C.13.2.1 There are 72 GP surgeries within Wolverhampton serving the local communities, although certain areas of the city (such as Finchfield and Wergs, in the west) have less coverage, and as such these areas could potentially have somewhat restricted access to healthcare. Accessibility modelling data has been provided to Lepus by the Council, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. Sustainable pedestrian access to these services is considered to be under a 15-minute travel time.

C.13.2.2 Nine sites in Wolverhampton are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare. On the other hand, 18 sites in Wolverhampton are located within a 10-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a major positive impact on access to healthcare, based on existing infrastructure. The remaining 21 sites are within a 15-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to healthcare.

C.13.3 Public Transport Access to GP Surgery

C.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey, and according to accessibility modelling data, there are only small pockets of the city where these criteria would not be met. All of the reasonable alternative sites within Wolverhampton are located in areas within this travel time to a GP surgery via public transport. 38 sites are located within a 10-minute journey and would therefore be expected to have a major positive impact on sustainable access to healthcare. The remaining 10 sites are located within a 15-minute journey and would therefore be expected to have a minor positive impact on sustainable access to healthcare.

C.13.4 Access to Greenspace

C.13.4.1 Greenspaces are distributed throughout the city, including parks, allotments, playing fields and sports facilities. All sites in Wolverhampton are located within 600m of one or more

greenspaces. Therefore, a minor positive impact would be expected at the majority of sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

C.13.5 Net Loss of Greenspace

C.13.5.1 One reasonable alternative site, Site E19, wholly coincides with 'Bowling Green' greenspace located adjacent to Loverose Way, according to OS Open Greenspaces data⁶. Information provided by the Council indicates the 'Bowling Green' has not been used for over 15 years and is not a public greenspace, and as such a negligible impact is identified.

C.13.5.2 Site E12 does not coincide with any OS Open Greenspaces⁷, however, information provided by the Council has indicated that the entirety of the site coincides with public open space. The proposed development at Site E12 could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

C.13.6 Public Right of Way/Cycle Path

C.13.6.1 The majority of sites in Wolverhampton are located within 600m of the PRow and/or cycle network. The proposed development at these 47 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

C.13.6.2 Conversely, Site E22 is located wholly over 600m from the cycle network and is partially located within 600m to PRow, however, the majority of the site is located outside 600m of the PRow. Therefore, the proposed development at the site could potentially have a minor negative impact on pedestrian and cycle access.

⁶ Ordnance Survey (2023) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 01/12/23]

⁷ Ibid

Table C.13.1: Sites impact matrix for SA Objective 12 – Health

Site Use	Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
Residential	H1	+	+	++	+	0	+
Residential	H2	+	++	++	+	0	+
Residential	H3	+	+	++	+	0	+
Residential	H4	+	+	+	+	0	+
Residential	H5	+	+	++	+	0	+
Residential	H6	+	++	++	+	0	+
Residential	H7	+	++	++	+	0	+
Residential	H8	+	++	++	+	0	+
Residential	H9	+	++	+	+	0	+
Residential	H10	+	++	++	+	0	+
Residential	H11	+	++	++	+	0	+
Residential	H12	-	++	++	+	0	+
Residential	H13	+	+	++	+	0	+
Residential	H14	+	+	++	+	0	+
Residential	H15	+	+	++	+	0	+
Residential	H16	+	++	++	+	0	+
Residential	H17	+	++	++	+	0	+
Residential	H18	-	++	++	+	0	+
Residential	H19	+	+	++	+	0	+
Residential	H20	+	++	++	+	0	+
Residential	H21	+	++	++	+	0	+
Residential	SA-0054-WOL	+	+	+	+	0	+
Employment	E1	+	+	+	+	0	+
Employment	E2	+	+	++	+	0	+
Employment	E3	+	+	++	+	0	+
Employment	E4	+	+	++	+	0	+
Employment	E5	+	-	++	+	0	+
Employment	E6	+	-	++	+	0	+
Employment	E7	+	-	++	+	0	+
Employment	E8	+	+	++	+	0	+
Employment	E9	+	++	++	+	0	+
Employment	E10	+	++	++	+	0	+
Employment	E11	+	++	++	+	0	+
Employment	E12	+	+	++	+	-	+
Employment	E13	+	-	++	+	0	+
Employment	E14	+	+	++	+	0	+
Employment	E15	+	+	++	+	0	+
Employment	E16	+	+	+	+	0	+
Employment	E17	+	++	++	+	0	+
Employment	E18	+	+	++	+	0	+

Site Use	Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
Employment	E19	+	-	+	+	0	+
Employment	E20	+	+	+	+	0	+
Employment	E21	+	-	++	+	0	+
Employment	E22	+	-	+	+	0	-
Employment	E23	+	++	++	+	0	+
Employment	E24	+	-	++	+	0	+
Employment	E25	+	-	++	+	0	+
G&T	GT1	+	+	++	+	0	+

C.14 SA Objective 13: Economy

C.14.1 Employment Floorspace Provision

- C.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- C.14.1.2 There are 25 reasonable alternative sites proposed for employment use, 23 of which currently comprise areas of undeveloped land. Therefore, the proposed development at these 23 sites would be expected to result in a net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Sites E3 and E15 currently coincide with various employment sites including 'Auto Body Wolverhampton', 'AB Service', 'CL Refurbishments' and 'ADT Furnishings'. At this stage, it is uncertain whether the proposed development at these two sites would result in a net change in employment floorspace.
- C.14.1.3 10 sites proposed for residential use coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at two of these sites (H14 and H19) could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at eight of these sites could potentially have a major negative impact due to the possible loss of a large area of employment land.
- C.14.1.4 Sites H15, H17 and H20 coincide with a yard area that could still be an active employment site, office space, and Probert Court Nursing Home, respectively; however, it is uncertain whether these land uses are currently active employment land. It is uncertain whether the proposed development at these three sites would result in a net change in employment floorspace.
- C.14.1.5 The remaining residential and Gypsy and Traveller site are located on previously undeveloped land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

C.14.2 Pedestrian Access to Employment Opportunities

- C.14.2.1 Wolverhampton would be expected to provide a range of employment opportunities for new and current residents. Accessibility modelling data shows the distribution of employment locations, with a total of 136 mapped locations, generally clustered within the city centre and the large industrial/retail estates in the south, north and east of the city. According to the data, sustainable pedestrian access to employment opportunities (within a 30-minute walk) can be expected throughout the city, with the exception of a small proportion close to the western boundary. All residential sites and the singular Gypsy and Traveller site are located within 20-minute walk to employment locations and would therefore be expected to have a major positive impact on pedestrian access to employment opportunities.

C.14.3 Public Transport Access to Employment Opportunities

C.14.3.1 Accessibility modelling data indicates that the whole of Wolverhampton is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. All proposed residential / Gypsy and Traveller sites in Wolverhampton are wholly within a 20-minute journey. Therefore, development at all sites would be expected to have a major positive impact on sustainable access to employment opportunities.

Table C.14.1: Sites impact matrix for SA Objective 13 – Economy

Site Use	Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
Residential	H1	--	++	++
Residential	H2	0	++	++
Residential	H3	0	++	++
Residential	H4	--	++	++
Residential	H5	--	++	++
Residential	H6	--	++	++
Residential	H7	0	++	++
Residential	H8	0	++	++
Residential	H9	--	++	++
Residential	H10	0	++	++
Residential	H11	0	++	++
Residential	H12	--	++	++
Residential	H13	--	++	++
Residential	H14	-	++	++
Residential	H15	+/-	++	++
Residential	H16	0	++	++
Residential	H17	+/-	++	++
Residential	H18	0	++	++
Residential	H19	-	++	++
Residential	H20	+/-	++	++
Residential	H21	0	++	++
Residential	SA-0054-WOL	--	++	++
Employment	E1	++	0	0
Employment	E2	++	0	0
Employment	E3	+/-	0	0
Employment	E4	++	0	0
Employment	E5	++	0	0
Employment	E6	++	0	0
Employment	E7	++	0	0
Employment	E8	++	0	0
Employment	E9	++	0	0
Employment	E10	++	0	0
Employment	E11	++	0	0
Employment	E12	++	0	0

Site Use	Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
Employment	E13	++	0	0
Employment	E14	++	0	0
Employment	E15	+/-	0	0
Employment	E16	++	0	0
Employment	E17	++	0	0
Employment	E18	++	0	0
Employment	E19	++	0	0
Employment	E20	++	0	0
Employment	E21	++	0	0
Employment	E22	++	0	0
Employment	E23	++	0	0
Employment	E24	++	0	0
Employment	E25	++	0	0
G&T	GT1	0	++	++

C.15 SA Objective 14: Education, Skills and Training

C.15.1 Pedestrian Access to Primary School

C.15.1.1 There are 94 primary schools distributed throughout Wolverhampton. Accessibility modelling data has been provided to Lepus by the Council, mapping the location of primary schools and areas within a sustainable travel time to these schools for pedestrians. Some small areas of the city lie outside of the sustainable 15-minute walk to a primary school, whereas the majority of the city would be expected to meet these criteria.

C.15.1.2 23 sites proposed for residential / Gypsy and Traveller use are located within a 15-minute walking distance to a primary school. Of these 23 sites, the majority (19 sites) are located within a 10-minute walking distance to a primary school, therefore, the proposed development at these 19 sites would be expected to have a major positive impact on pedestrian access to primary schools. The remaining four sites are located within a 15-minute walking distance to a primary school; therefore, the proposed development at these four sites could potentially have a minor positive impact on pedestrian access to primary schools.

C.15.2 Pedestrian Access to Secondary School

C.15.2.1 There are 22 secondary schools in Wolverhampton, and similarly to primary schools, almost the entirety of the city is identified as being within a sustainable travel time for pedestrians.

C.15.2.2 Two residential sites (H9 and SA-0054-WOL) are situated in the areas of the city outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education. Conversely, 21 residential / Gypsy and Traveller sites in Wolverhampton are within a 25-minute walk to a secondary school, and 14 of these are located within a 20-minute walk to a secondary school, and would therefore be expected to encourage pedestrian access to secondary schools and have a major positive impact on education, skills and training. The remaining seven sites are located within a 25-minute walk to a secondary school, and would therefore be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training.

C.15.3 Public Transport Access to Secondary School

C.15.3.1 Existing public transport within Wolverhampton is widespread and would be likely to provide current and future residents in most areas with suitable access to secondary schools in the local and surrounding area, according to the accessibility modelling data.

C.15.3.2 The majority of proposed residential / Gypsy and Traveller sites (22) are located within a 25-minute public transport journey to a secondary school, and of these 22 sites 18 are located within a 20-minute public transport journey to a secondary schools; therefore, the proposed development at these 18 sites would be expected to have a major positive impact

on sustainable access to education, based on current infrastructure. The remaining four sites are located within a 25-minute public transport journey to secondary schools; therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to education, based on current infrastructure.

C.15.3.3 However, Site H18 is located outside of this sustainable travel time to a secondary school, and therefore, the proposed development at the site could potentially have a minor negative impact on new residents’ access to education, based on current infrastructure.

Table C.15.1: Sites impact matrix for SA Objective 14 – Education, skills and training

Site Use	Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
Residential	H1	++	++	++
Residential	H2	++	++	++
Residential	H3	++	++	++
Residential	H4	++	++	++
Residential	H5	++	+	++
Residential	H6	++	++	+
Residential	H7	++	++	+
Residential	H8	++	+	++
Residential	H9	+	-	++
Residential	H10	++	++	++
Residential	H11	++	++	++
Residential	H12	++	++	+
Residential	H13	++	++	+
Residential	H14	+	+	++
Residential	H15	++	+	++
Residential	H16	++	+	++
Residential	H17	++	++	++
Residential	H18	++	+	-
Residential	H19	++	++	++
Residential	H20	++	++	++
Residential	H21	++	++	++
Residential	SA-0054-WOL	+	-	++
Employment	E1	0	0	0
Employment	E2	0	0	0
Employment	E3	0	0	0
Employment	E4	0	0	0
Employment	E5	0	0	0
Employment	E6	0	0	0
Employment	E7	0	0	0
Employment	E8	0	0	0
Employment	E9	0	0	0
Employment	E10	0	0	0
Employment	E11	0	0	0
Employment	E12	0	0	0
Employment	E13	0	0	0

Site Use	Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
Employment	E14	0	0	0
Employment	E15	0	0	0
Employment	E16	0	0	0
Employment	E17	0	0	0
Employment	E18	0	0	0
Employment	E19	0	0	0
Employment	E20	0	0	0
Employment	E21	0	0	0
Employment	E22	0	0	0
Employment	E23	0	0	0
Employment	E24	0	0	0
Employment	E25	0	0	0
G&T	GT1	+	+	++

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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