

Main Document Response Form

Wolverhampton Local Plan, Issues & Preferred Options (Regulation 18) Consultation

Monday 26 February – Wednesday 10 April, 2024

We are inviting your views on the Wolverhampton Local Plan Issues & Preferred Options consultation.

We would encourage you to use the online response form at www.wolverhampton.gov.uk/localplan-respond that is designed to be quick and easy to complete, where you can answer the questions in the Issues & Preferred Options main document and make any other comments about the Wolverhampton Local Plan. A shorter survey about the Issues & Preferred Options summary leaflet is also available from the link.

Please visit the website www.wolverhampton.gov.uk/localplan where you will find the Issues & Preferred Options main document, summary leaflet and other information including evidence documents and an interactive map.

Paper copies of this response form, the main document and other documents (for reference), plus the summary leaflet are available at:

- Wolverhampton Civic Centre, St Peter's Square, Wolverhampton WV1 1SH (at the business reception by the mayoral entrance)
- All of Wolverhampton's libraries www.wolverhampton.gov.uk/find-library

The consultation period begins on Monday 26 February and ends at 5pm on Wednesday 10 April, 2024.

Completed digital versions of this comments form should be emailed to:

localplan@wolverhampton.gov.uk

or completed printed copies should be posted/ handed in to: Wolverhampton Local Plan, City Planning, City of Wolverhampton Council, St Peter's Square, Wolverhampton WV1 1RP

If you require any assistance in completing this form, or would like more information, please contact the Wolverhampton Local Plan Team at the above email address or Tel: 01902 551155

1. This form has three parts:

- Part 1: Your responses to the Wolverhampton Local Plan Issues & Preferred Options Main Document Consultation Questions
- Part 2: a. Your Details & b. Equalities Monitoring Information (voluntary)
- Part 3: A Declaration which you will need to read and sign

2. Responses must include your name, address and if possible email address

3. Your comments cannot be treated as confidential. By completing this form, you agree to your details being shared and your name and comment (but not your address or other personal details) being made available for public viewing

4. It is recommended that groups that share a common view send a single response rather than multiple copies of the same response. Please attach a list of the contact details of each person who supports the comments, including their names, addresses and if possible their email addresses.

5. Completed forms should be received by us no later than 5pm on Wednesday 10 April, 2024

6. Unfortunately individual acknowledgement of receipt will not be possible

Part 1: Main Document Consultation Questions

The questions below correspond to the questions set out in the Main Document. To help, the section references that the questions relate to in the Main Document are provided. If you are completing this form electronically, text can be added in the boxes. If you are completing a printed version your responses can continue onto the back page and attach additional sheets of paper if required.

Question 1: Do you agree with the proposed scope of the Wolverhampton Local Plan?

(please see Main Document section 1)

Yes No Don't know

Comments:

Question 2: Do you agree with the “big issues” identified for the Wolverhampton Local Plan to address?

(please see Main Document sections 2 & 3)

Yes No Don't know

Comments:

Question 3: Do you agree that the evidence and background documents listed in Table 1 are sufficient to support the Wolverhampton Local Plan?

(please see Main Document section 4)

Yes No Don't know

Comments:

1. The evidence base includes the Black Country EDNA Updates of 2021 and 2023. Reference is also made to the EDNA in paragraphs 5.26 and 5.27, under the heading of Employment Land Growth, as the principal evidence in projecting a need for employment land and identifying a supply.
2. Nurton Developments Ltd (NDL) has made representations in respect of various iterations of the Black Country EDNA. This has included: -
 - The 2021 Update, in respect of the now withdrawn Draft Black Country Development Plan.
 - The 2022 Update, in respect of the Sandwell Local Plan Issues and Options.
 - The 2023 Update, in respect of the Dudley Draft Local Plan.
3. The representations made in respect of the Dudley Draft Local Plan, submitted in December 2023, provide a critique of the latest version of the EDNA (i.e. the 2023 Update). This critique is still relevant and is relied upon by NDL in making representations to the Wolverhampton Local Plan Issues and Preferred Options. A copy of the representations is attached, along with its associated appendices.
4. For ease of reference, the principal elements of NDL's critique are provided in summary form below.
5. NDL's principal concern, at this initial stage of the Local Plan review process, is to ensure that the evidence base on the need and supply of employment land in the Black Country is accurate, realistic, and consistent. If it is, then it will provide a sound basis for the Black Country Local Planning Authorities, including Wolverhampton, for discussions with neighbouring and other planning authorities which have a functional link with the Black Country, under the Duty to Co-operate, on the quantity and quality of employment land that they will provide in order to help to meet the need of the Black Country which cannot be met itself in the Black Country.
6. NDL's critique of both the 2022 and 2023 EDNA Updates concludes:
 - the figures for employment land need have been under-estimated;
 - the assessment of deliverable supply has been over-estimated;
 - thus, the shortfall between need and supply has been significantly under-estimated; and
 - there is a clear mismatch between the quality and type of site demanded by occupiers and developers and those being supplied through the development plan-making process.
7. NDL's principal concerns about the assessment of need cover the following: -
 - Arbitrary deployment of method for each authority and lack of consistency.
 - No allowance for suppressed demand.
 - Under-estimation of replacement of future losses.
 - No allowance for flexibility or market churn.
 - Insufficient wider assessment of strategic employment land.
8. For the above reasons, NDL considers that the need assessed by the EDNA 2023 remains a significant under-estimation. The base need should be increased to 623 ha. To this should be added a further minimum allowance of 49 ha, as a margin for flexibility. This would generate a **minimum need of 672 ha** for the Black Country for the plan period.
9. NDL has three principal concerns about the assessment of supply. These are: -
 - The nature of the supply.
 - The likely yield.
 - The assumption that windfall sites should be counted.
10. On this basis, NDL considers that the **maximum** supply of new employment land will be 302 ha.
11. Table 4.1 of the EDNA 2023 identifies a shortfall of 153 ha for the Black Country. This is derived by deducting a supply of 380 ha from a need of 533 ha. For the reasons set above, NDL contends that there is a **minimum need of 672 ha** and a **maximum supply of 302 ha**. This leaves a **minimum shortfall of 370 ha**. Overall, there is a much larger shortfall in quantitative terms, between need and supply, than the EDNA is articulating.
12. In addition, there is a clear qualitative shortage of large strategic employment sites, which the EDNA pays no heed to. It makes no reference to the West Midlands Strategic Employment Sites Studies. The latest published iteration of this study, issued in May 2021, concludes that there is a shortage of large sites (i.e. over 25 ha) across the West Midlands, especially serving the Black Country and southern Staffordshire, and an 'urgent' need to bring forward a new portfolio of sites.
13. NDL notes that the EDNA is due to be updated to support the Publication draft version of the Local Plan. We would respectfully ask that NDL's critique is taken into account by the authors of the EDNA, independent consultants WECD, in reviewing and updating the EDNA.

Question 4: Do you agree with the proposed approach to the Vision and Strategic Priorities for the Wolverhampton Local Plan?

(please see Main Document section 5 A)

Yes No Don't know

Comments:

Question 5: Do you agree with the Preferred Housing Growth Option (H3) for the Wolverhampton Local Plan and the proposed apportionment approach to housing contributions from neighbouring authorities?

(please see Main Document section 5 B i))

Yes No Don't know

Comments:

Question 6: Do you agree with the Preferred Gypsy and Traveller Pitch Option (G2) for the Wolverhampton Local Plan?

(please see Main Document section 5 B (ii))

Yes No Don't know

Comments:

Question 7: Do you agree with the Preferred Employment Land Growth Option (E3) for the Wolverhampton Local Plan?

(please see Main Document section 5 B (iii))

Yes No

Don't know Comments:

1. Nurton Developments Ltd (NDL) agrees with the principle of the preferred option. Because of the lack of land capacity within Wolverhampton, especially obvious development options for larger strategic employment sites, there is a clear imperative to work with neighbouring authorities to export any shortfall of land through the Duty to Co-operate.

2. However, NDL considers that the identified shortfall of 53.3 ha for Wolverhampton is a significant under-estimation quantitatively. This is for reasons set out in NDL's response to Question 3, with specific reference to the latest update of the EDNA. In addition, there is an acknowledged identified qualitative need for large strategic employment sites in excess of 25 ha.

3. The prospect of meeting this shortfall in neighbouring Black Country authorities is remote. Dudley, Sandwell and Walsall are constrained for the same reasons as Wolverhampton. However, opportunities do exist in South Staffordshire, which forms part of the same FEMA (along with Cannock). This is particularly so north of Wolverhampton due to the routing of the M6 and M54 and the location of nodal points at the junctions of the two motorways with the strategic road network.

4. A particular opportunity exists outside the City's boundaries at Junction 11 of the M6 motorway. This junction is due to be upgraded as part of the proposed M6 M54 Link Road. Construction of this important piece of infrastructure for the sub-region is due to start this year. NDL is promoting a large site at this junction, with capacity for 175,000 sqm (1.87 million sq ft) on a site of 43 ha (developable). This site is well placed to meet any shortfall of need from Wolverhampton, and the wider Black Country, as well as meeting a sub-regional need for strategic sites.

Question 8: Do you agree with the Preferred Spatial Option (G – Balanced and Sustainable Growth) for the Wolverhampton Local Plan?

(please see Main Document section 5 B (iv))

Yes No Don't know

Comments:

Question 9: Do you agree with the preferred approach to policies in the Wolverhampton Local Plan (that the policies and Policies Map designations should repeat those in the Draft Black Country Plan (2021), subject to the amendments set out in Appendix 2 and summarised in section 5 C)?

(please tell us which policies you are referring to)

Yes No Don't know

Comments:

Question 10. Do you agree with the proposed site allocations for the Wolverhampton Local Plan (housing, gypsy & traveller pitch, employment development, waste and minerals)?

(please see Main Document section 5 D – housing, gypsy & traveller pitch, employment development, waste and minerals; and please tell us which sites you are referring to, using the site references in Table 4 and the Draft Black Country Plan (2021))

Yes No Don't know

Comments:

Question 11: Do you have any other comments to make about the Wolverhampton Local Plan?

(please use the opportunity below to provide any further comments you wish to make on the Wolverhampton Local Plan Issues & Preferred Options consultation. This could include any responses to the Issues & Preferred Options Summary Leaflet and/ or other information, such as the Sustainability Appraisal, Interactive Map and supporting evidence. Please state clearly what aspect of the consultation you are referring to e.g. document/ page/ section/ question/ site reference/ policy area)

Part 2a: Your Details

	A. INDIVIDUAL OR (IF APPLICABLE) AGENT	B. ORGANISATION (IF APPLICABLE)
Name:*	<input type="text"/>	<input type="text" value="Peter Leaver"/>
Organisation Name (if applicable):	<input type="text"/>	<input type="text" value="Nurton Developments Ltd"/>
ADDRESS:*		
House/Building No./ Name:	<input type="text"/>	<input type="text" value="11"/>
Street:	<input type="text"/>	<input type="text" value="Waterloo Street"/>
Town:	<input type="text"/>	<input type="text"/>
City/County:	<input type="text"/>	<input type="text" value="Birmingham"/>
Postcode:	<input type="text"/>	<input type="text" value="B2 5TB"/>
Telephone:	<input type="text"/>	<input type="text" value="07970 611 236"/>
*Email:	<input type="text"/>	<input type="text" value="pjl@nurton.ltd"/>

Notes:

1. If you are responding as an individual (e.g. a resident) you do not need to fill in the organisation boxes unless you are responding as a member of an organisation.
2. If you are an individual or agent responding on behalf of a client please ensure that your details are completed in Column A and, as a minimum, the name and organisation boxes of the client you are responding on behalf of, are completed in Column B.
3. *Names, addresses and if possible email addresses must be provided

Part 2b: Equalities Monitoring Information (voluntary)

City of Wolverhampton Council as a public sector organisation has a responsibility to ensure that we do not unfairly discriminate in the services we provide and are accessible to everyone. In order to do this, the Council collects equality monitoring data.

Why do we want to know these things about you?

It is very important for City of Wolverhampton Council to collect information about respondents to understand whether the feedback we get from these surveys is representative of our resident population. You are welcome to complete these optional questions. The disclosure of this data is treated in the strictest confidence.

What is your postcode?

What is your age?

- | | | |
|-----------------------------------|----------------------------------|--|
| <input type="checkbox"/> Under 16 | <input type="checkbox"/> 35 – 44 | <input type="checkbox"/> Over 65 |
| <input type="checkbox"/> 16 – 24 | <input type="checkbox"/> 45 – 54 | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> 25 – 34 | <input type="checkbox"/> 55 – 64 | |
-

What is your sex? (a question about gender identity will follow)

- Male Female Prefer not to say
-

Is the gender you identify with the same as your sex registered at birth?

- Yes No Prefer not to say
-

What best describes your gender?

- Female Non-binary Prefer not to say
 Male I use another term
-

What is your legal marital or registered civil partnership status?

- | | |
|---|---|
| <input type="checkbox"/> Never married and never registered a civil partnership | <input type="checkbox"/> Divorced |
| <input type="checkbox"/> Married | <input type="checkbox"/> Formally in a civil partnership which is now legally dissolved |
| <input type="checkbox"/> In a registered civil partnership | <input type="checkbox"/> Widowed |
| <input type="checkbox"/> Separated, but still legally married | <input type="checkbox"/> Surviving partner from a registered civil partnership |
| <input type="checkbox"/> Separated, but still legally in a civil registered partnership | <input type="checkbox"/> Prefer not to say |
-

What is your legal marital or registered civil partnership status?

- | | |
|--|---|
| <input type="checkbox"/> English, Welsh, Scottish, Northern Irish or British | <input type="checkbox"/> Any other Black, Black British or Caribbean background |
| <input type="checkbox"/> Irish | <input type="checkbox"/> Arab |
| <input type="checkbox"/> Gypsy or Irish Traveller | <input type="checkbox"/> White and Asian |
| <input type="checkbox"/> Roma | <input type="checkbox"/> Any other Mixed or Multiple background |
| <input type="checkbox"/> Any other white background | <input type="checkbox"/> Indian |
| <input type="checkbox"/> White and Black Caribbean | <input type="checkbox"/> Pakistani |
| <input type="checkbox"/> White and Black African | <input type="checkbox"/> Bangladeshi |
| <input type="checkbox"/> Any other Asian background | <input type="checkbox"/> Chinese |
| <input type="checkbox"/> Caribbean | <input type="checkbox"/> Any other ethnic group |
| <input type="checkbox"/> African background | <input type="checkbox"/> Prefer not to say |

What is your religion?

No Religion

Christian (including Church of England, Catholic, Protestant and all other Christian denominations)

Buddhist

Hindu

Jewish

Muslim

Sikh

Any Other Religion

Prefer not to say

Do you have any, disabilities, physical or mental health conditions or illnesses lasting or expected to last 12 months or more?

Yes

No

Prefer not to say

What best describes your sexual orientation?

Straight

Bisexual

Prefer not to say

Gay/Lesbian

I use another term

Do you have an armed forces connection in the past or present day?

Currently a full-time member of the Armed Forces

Previous Service in Armed Forces

No

Currently a Reservist

A Military spouse/partner

Prefer not to say

Part 3: Declaration

How we will use your personal information

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the council to contact you if necessary regarding your submission, such as to clarify your consultation responses. Your name, organisation and comments will be made available for public viewing when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and in order to protect personal data and confidentiality, we will not publish signatures, telephone numbers, postal addresses, email addresses or any equality monitoring data. Your details will be kept until the Local Plan is adopted plus a further ten years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. When other agencies are involved in Local Plan preparation, we may need to share details about you to enable us to work together for your benefit. Information will only be shared with third parties if they have genuine and lawful need for it. Information shared on this basis will not be reused for any other purpose. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

DECLARATION

By completing and signing this form, I agree to my name, organisation and representations being made available for public inspection on the internet. Please sign and date this form below. Forms signed electronically will be accepted.

Signature:

Peter J Leaver

Date:

5.4.2024

I understand that in submitting my representations, that my details will be added to the Local Plan Consultation database for Wolverhampton and I may be contacted at future stages of the Local Plan process. All personal data will be processed in accordance with the Data Protection Act 2018 and the UK GDPR. If you do not wish to be contacted further, please tick the box below:

I would prefer not to be contacted in future about the Local Plan

A copy of our privacy notice is available from www.wolverhampton.gov.uk/localplan

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Wolverhampton Local Plan
City Planning, City of Wolverhampton Council
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Wolverhampton
WV1 1RP

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Please submit your comments form by 5pm Wednesday 10 April, 2024. Thank you.

You can get this information in large print, braille, audio or in another language by calling 01902 551155 or emailing translations@wolverhampton.gov.uk

wolverhampton.gov.uk 01902 551155

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City of Wolverhampton Council, Civic Centre, St. Peter's Square, Wolverhampton WV1 1SH