



**SANDWELL LOCAL PLAN - EXAMINATION IN PUBLIC
JANUARY 2025**

TOPIC PAPER – THE ENVIRONMENT

Appendix 4 - Assessment of non-climate change policies following revision of climate change evidence

Extract taken from table “Association with wider Sandwell MBC Reg 19 Policy” [Bioregional and Edgars report for Sandwell MBC, August 2024]

<https://www.sandwell.gov.uk/downloads/file/3278/sandwell-climate-change-study-output-3-evidence-base-september-2024->

Non-climate change policy	Proposed change
<p>Policy SDS1 Spatial Strategy for Sandwell</p> <p>The current policy refers to the ‘minimisation and mitigation of the likely effects of climate change, and the multifunctional benefits of open spaces and green and blue infrastructure</p> <p>The current policy also references promoting zero or low carbon designs, building techniques, materials, and technologies</p>	<p>No change proposed</p>
<p>Policy SDS2 Increasing efficiency and resilience</p> <p>The policy outlines that development should be designed to mitigate climate change and provide adaptations that mitigate adverse effects on human health</p> <p>The policy then cross refers to elements of climate mitigation and adaptation (criteria a-k).</p>	<p>No change proposed</p> <p>Policy will need to be amended to include new policy references.</p> <p>Recommend inserting new criteria to cover off net zero requirement in all residential buildings, and for major non-residential buildings.</p> <p>Recommended changes to policy criteria:</p> <p>a – refer to passive design to minimise internal heat generation through consideration to orientation, shading, thermal mass and insulation.</p> <p>e & f – combine to cover utilisation of sustainable drainage systems and prioritisation into natural drainage solutions.</p> <p>h – remove – policy does not cover this specifically.</p>

Non-climate change policy	Proposed change
<p>Policy SDS5 – Achieving Well-designed Places Refers to climate change mitigation and adaptation.</p>	<p>Policy will need to be amended to include new policy references.</p>
<p>Policy SDS8 - Green and Blue Infrastructure in Sandwell Refers to climate change mitigation and adaptation.</p>	<p>No change proposed</p>
<p>Policy SNE3 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows Refers to the value of trees to mitigate and adapt to climate change</p>	<p>No change proposed</p>
<p>Policy SNE6 – Canals Refers to flood risk and utilisation in sustainable drainage systems. Refers to adaptation of canals to help mitigate the effects of climate change</p>	<p>No change proposed</p>
<p>Policy SHE1 –SHE4 Suite of policies refers to the conservation and enhancement of designated and non-designated heritage assets Climate change policies are likely to interact with policies SHE1-SHE4 where new development is proximal to a historic asset, however it is considered that neither these policies, or the recommended climate change policies require alteration to ensure a successful relationship.</p>	<p>No change proposed.</p>
<p>Policy SHW1– Health Impact Assessments Policies refer to health impact assessment, of which includes quality of housing and mitigation and adaptation to climate change The relationship between the climate change policies and SHW1 is positive.</p>	<p>No change proposed.</p>
<p>Policy SHW3 – Air Quality Policy refers to energy generation in new development.</p>	<p>Recommended changes:</p>

Non-climate change policy	Proposed change
	<p>c. Policy directs development away from fossil fuel, therefore remove reference to ultra-low NOx boilers.</p> <p>Policy will need to be amended to reference new policy references.</p>
<p>Policy SHW4 – Open Space and Recreation</p> <p>Refers to open space’s benefits in mitigating against the effects of climate change</p>	<p>No change proposed.</p>
<p>Policy SHO3 - Housing Density, Type and Accessibility</p> <p>The policy refers to density and type of development in relationship to design.</p> <p>The design of development could be impacted by climate change policies, e.g. orientation, provision of renewable energy etc.</p>	<p>Recommend amending criteria c to include reference to mitigation and adaption to climate change.</p>
<p>Policy SHO4 – Affordable Housing</p> <p>Policy includes inclusion of, or financial contribution to affordable housing</p> <p>The delivery of affordable housing is subject to viability, it is acknowledged that compliance with the climate change policies may also impact some development through viability also. However, it's not considered that either this policy or the climate change policies require any further amendments as both refer to individualised viability for schemes, which the Council requires under each policy if the requirements for affordable housing, or compliance with climate change policies is unviable.</p>	<p>No change proposed.</p>
<p>Policy SHO5 – Delivering Accessible and Self / Custom Build Housing</p> <p>Relates to new build dwellings</p> <p>The threshold for climate change policy SCC1 requires that all new dwellings are net zero carbon, and such accessible and custom builds would be subject to this policy.</p>	<p>The policy may benefit from being amended to cross refer to SCC1 as a requirement for the standard of new dwellings.</p>
<p>Policy SHO6 - Financial Viability Assessments for Housing</p>	<p>We consider that it is down to the Council to decide what requirements of the Local Plan is</p>

Non-climate change policy	Proposed change
<p>Relates to development viability and requires that if compliance with local plan policies is unviable, then applicants need to demonstrate this through a viability assessment.</p> <p>Paragraph 4 relates specifically to affordable housing, and not compliance with SCC1- SCC2.</p>	<p>reduced or removed should developer viability be challenging, as such we recommend the Council reviews this policy.</p>
<p>Policy SHO9 – Education Facilities</p> <p>Relates to development of educational buildings or estates</p> <p>The type of development would be subject to recommended policy SCC2 if it met the thresholds for development.</p>	<p>No change proposed.</p>
<p>Policy SHO10 – Accommodation for Gypsies, Travellers and Travelling Show people</p> <p>Policy relates to safeguarding and meeting the future needs of gypsies, travellers and travelling showpeople</p>	<p>Policy will need to be amended to include new policy references. (flooding)</p>
<p>Policy SHO11 - Housing for people with specific needs</p> <p>Policy relates to specific needs within new housing.</p> <p>The type of development would be subject to recommended policy SCC1 and SCC2 if it met the thresholds for development. The type of development would be subject to recommended policy SCC1 and SCC2 if it met the thresholds for development.</p>	<p>No change proposed.</p>
<p>Policy SEC1 - 4</p> <p>Policies relate to non-residential development</p> <p>New non-residential development would be subject to recommended policy SCC2 if it met the thresholds for development.</p>	<p>No change proposed.</p>
<p>Policy SWA1 – Waste Infrastructure Future Requirements</p> <p>Policy refers to waste minimisation and recycling of waste through construction phases.</p> <p>New development would need to comply with this policy and the requirements of SCC4.</p>	<p>No change proposed.</p>
<p>Policy SWA4 – Locational Considerations for New Waste Facilities</p>	<p>No change proposed.</p>

Non-climate change policy	Proposed change
<p>Policy refers to opportunities to supply heat or power from waste development</p> <p>Policies SCC1 and SCC2 refer to decentralised energy.</p>	
<p>Policy SWA5 – Resource Management and New Development</p> <p>Policy refers to waste management in new development which includes minimising waste, maximising the use of materials with low environmental impacts</p>	<p>No change proposed.</p>
<p>Policy SDM1 – Design Quality</p> <p>The policy does not refer to mitigation or adaption to climate change but does include reference to green and blue infrastructure.</p>	<p>Recommend adding criteria j to include reference to mitigation and adaption to climate change in accordance with SCC3.</p>
<p>Policy SDM2 – Development and Design Standards</p> <p>Policy outlines standards for new development including space standards and water efficiency.</p> <p>All new residential development will be subject to SCC1 as well as this policy.</p>	<p>It is considered that repetition is not required, but the Council may be minded to cross reference to policy SCC1 for energy efficiency standards.</p>
<p>Delivery, Monitoring, and Implementation</p>	<p>Will need to be amended to include new policy references (flooding – policies SCC5 and SCC6)</p>