

Tamworth Borough Local Plan Sustainability Appraisal

Appendix B

Record of Consultation Responses

August 2026

B.1 Responses to the SA Scoping Report Consultation

Table B.1: Responses to SA Scoping Report Consultation (November-December 2025)

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
Environment Agency	[In reference to Section 11.0 – Climatic Factors] Section 11.1.1. seeks to address flood risk matters in the Borough and highlights the high level of risk of flooding in Tamworth along with initiatives to help reduce the impacts and improve resilience. Reference is made to the Towns formal flood defence infrastructure and it should be noted that discussions are ongoing to improve the standard of these defences. We would expect this to be referenced and considered in the evidence base supporting the forthcoming Local Plan, specifically the Level 1 Strategic Flood Risk Assessment (SFRA).	Referenced in Section 11.4 (page 99) of SA Scoping Report (Climatic Factors chapter)
Environment Agency	[In reference to Section 11.0 – Climatic Factors] Whilst section 11.4 (Data Gaps) highlights the need for a new Water Cycle Study we would also expect reference to the need for a Level 1 SFRA along with, potentially, a Level 2 document should any allocated sites be promoted in area at flood risk.	The need for a Level 2 SFRA has been referenced in Section 11.4 (page 99) of SA Scoping Report (Climatic Factors chapter). A Level 1 SFRA was undertaken in 2024/2025.
Environment Agency	[In reference to Section 11.0 – Climatic Factors] We acknowledge the baseline data utilised in the flood risk section of this chapter. It should be noted that from 25 March 2025, new Flood Zones were produced for the Flood Map for Planning as part of the new National Flood Risk Assessment (NaFRA2). This update uses new national modelling alongside local models. You can find out more about our new national risk information for flooding and coastal erosion by visiting these web pages: New national flood and coastal erosion risk information - GOV.UK ¹ New national flood and coastal erosion risk information - Town and Country Planning Association ² .	Figure 11-2 in Section 11.1.1 (page 86) has been updated using the most recent data (GOV.UK), dated November 2025.

¹ <https://www.gov.uk/guidance/updates-to-national-flood-and-coastal-erosion-risk-information>

² <https://www.tcpa.org.uk/resources/new-national-flood-and-coastal-erosion-risk-information/>

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
Environment Agency	[In reference to Section 11.0 – Climatic Factors] The extent of functional floodplain (Flood Zone 3b) should be identified as part of the SFRA. Identifying areas of functional floodplain in Tamworth will help the Plan to detect areas unsuitable for development, as well as areas where existing development and infrastructure may not be sustainable in the long term. See paragraph 012 of the Flood Risk and Coastal Change section of the National Planning Practice Guidance (PPG). The PPG also refers to Environment Agency guidance on considering climate change in planning decisions which is available online ³ . It should be used to help planners, developers and advisors implement the National Planning Policy Framework (NPPF)'s policies and practice guidance on flood risk. It will help inform Flood Risk Assessments (FRA's) for planning applications, local plans, neighbourhood plans and other projects.	Referenced in Section 11.4 (page 99) of Scoping Report (Climatic Factors chapter)
Environment Agency	[In reference to Section 11.0 – Climatic Factors] We are encouraging all Local Authorities to identify climate change as an overall Development Plan priority and to align policies with national net zero targets and mitigation policies. There is a statutory duty on LPAs to include policies in their Local Plans designed to tackle climate change and its impacts. Section 19 of the Planning and Compulsory Purchase Act 2004 states that 'Local development plans must include policies designed to secure that the development of and use of land contribute to mitigation of and adaptation to climate change'. Revisions to the NPPF in 2021 include a requirement to promote a sustainable pattern of development, by mitigating climate change and adapting to its effects (para 11a). The NPPF also states (para 134) that enhanced local policies and government guidance on design should be given 'significant weight'. To assist the following links (Planning Advisory Service and Sustainability West Midlands) offer support to help	Noted, no change to scoping information required

³ <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	Councils plan for climate change and provide details of the West Midlands Climate Change Adaption Plan. Planning for Climate Change Local Government Association ⁴ West Midlands Climate Change Adaptation Plan 2021-2026 – Sustainability West Midlands ⁵ I have also attached our West Midlands Area Climate Change Guidance which may assist you moving forward and relates to a number of the key issues and questions raised within this consultation.	
Environment Agency	[In reference to Section 11.0 – Climatic Factors] We support the paragraph (page 94) on water scarcity. Severn Trent Water supplies water for Tamworth and is classified as an area of serious water stress. Serious water stress is defined as the current or future household demand for water is a high proportion of the current effective rainfall which is available to meet that demand. In addition, the baseline could reference the West and East Midlands moving to drought status as of 15 July 2025, following the driest spring for 132 years. More information about why we've moved to drought status can be found at West and East Midlands move into drought - GOV.UK ⁶ .	Additional wording added to 11.1.3 (page 94) of the Scoping Report (Climatic Factors chapter) to reflect suggestions made.
Environment Agency	[In reference to Section 11.0 – Climatic Factors] We recommend early liaison with the water companies to identify which sewage treatment works will serve future development, whether there is capacity in the network and when any infrastructure improvement projects are envisaged. This will help to inform sustainable development locations as well as any necessary phasing constraints for development. We would not wish to see any strategic allocations being located in areas that will not be served by mains foul drainage.	Noted, no change to scoping information required.
Environment Agency	[In reference to Section 12.0 – Biodiversity, Geodiversity, Flora and Fauna] Along with habitat sites and their condition we welcome	Noted, no change to scoping information required.

⁴ <https://www.local.gov.uk/planning-climate-change>

⁵ <https://www.sustainabilitywestmidlands.org.uk/resources/west-midlands-climate-change-adaptation-plan-2021-2026/>

⁶ <https://www.gov.uk/government/news/west-and-east-midlands-move-into-drought>

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	reference to watercourses in Tamworth Borough and their contribution to biodiversity. The Water Framework Directive (WFD) and the associated Humber River Basin Management Plan (RBMP's) is also reflected in this section. Tamworth falls within the Tame Anker and Mease Management Catchment. WFD is the key driver for cross-cutting environmental improvements, not only for Water Quality but also for Biodiversity. Returning water courses to a more natural state can be achieved, even with heavily modified waterbodies such the canals and rivers in Tamworth.	
Environment Agency	[In reference to Section 15.0 – Soils, Water and Minerals] We welcome the references to water company supply for water and sewerage services and description of Water Framework Directive status of waterbodies in Tamworth. This describes the water bodies at 'poor' status, heavily modified or artificial due to urbanisation. It's good this section mentions the pressures from contaminated land, urban runoff and treated sewage effluent. This should link to the context of seeking to improve failing waterbodies through appropriate mechanisms such as Sustainable Drainage Systems (SuDS) and improvements to watercourses (including new watercourses or opening up of culverted systems).	Additional wording added to Section 15.1 (page 120) of the Scoping Report (Soils, Water and Minerals chapter)
Environment Agency	Future development should help to facilitate the restoration of watercourses, such as deculverting of any watercourse within or on the boundary of a site, naturalising artificially engineered riverbank or beds, and providing an adequate riparian corridor in meeting flood risk, linked to RBMP and WFD objectives.	Added a further decision-making consideration to support Objective 12 in the SA Framework (Table 17-1) (page 131). This additional consideration is [does the policy or option] "Restore watercourses to a more natural state?".
Environment Agency	With reference to the Water Framework Directive (WFD) we would expect you to continue to help address WFD failures through your role as planner, issuing ordinary watercourse consents and as land manager. All watercourses in the Plan area (and UK) are duty bound to	Noted, no change to scoping information required

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	reach Good Ecological Status or Potential (GES/GEP) by 2027 or as amended. It is essential that WFD is fully integrated into the Local Plan process and that all future development helps to address the issues that currently prevent the watercourse from achieving GES/GEP. WFD data is available from our Catchment Data Explorer tool at: http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9 Principal aquifers are designated as named groundwater bodies and these are also classified under WFD regulations. More information is available in the Tame Anker and Mease Abstraction Licensing Strategy 2022.	
Environment Agency	The allocation of sites for development should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zone's (SPZ's). This is especially important in SPZ1, which represents the most sensitive location. In considering groundwater vulnerability, and SPZ's within the Plan area, we would recommend that reference be made to our Groundwater Position Statements (formally Groundwater Protection: Policy and Practice (GP3) guidance) ⁷ .	Added wording regarding SPZs to Section 15.1 (page 120) (Soils, Water, Minerals chapter) of Scoping Report. A new figure has also been added (Figure 15-2) to show the location of SPZ, which are largely situated outside of the borough. The SA framework does not need updating. The existing Objective 9 Soils and Water Pollution decision making consideration "Maintain and improve surface water and groundwater quality?" is considered both proportionate and sufficient, given most of the borough does not contain any SPZs.
Environment Agency	Groundwater Vulnerability is an important consideration in parts of this area and further information is available in our CAMS documents. These are available at:	Wording added to Section 15.1 (page 120) of Scoping Report (Soils, Water, Minerals chapter).

⁷ <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-scams-process	An additional figure (Figure 15-2) has also been included in the Scoping Report to present data on source protection zones. Additional information in relation to groundwater vulnerability has been added to Section 15.1.
Environment Agency	Whilst not in the Town itself there is a Source Protection Zone to the west of Tamworth, on Tamworth Road. The zones are defined using models to estimate how long it will take for groundwater to travel below ground (any point below the water table) to the source (the point where water is taken). The area around the source needs protecting from potential pollution, therefore, these zones indicate an area very sensitive to pollution risks due to the proximity of drinking water sources. There is more information at Groundwater source protection zones (SPZs)Source Protection Zones [Merged] - data.gov.uk ⁸ .	Added wording regarding SPZs to Section 15.1 (page 120) (Soils, Water, Minerals chapter) of Scoping Report and a new figure showing the location of SPZ, which are largely outside of the borough. The SA framework does not need updating. The existing Objective 9 Soils and Water Pollution decision making consideration "Maintain and improve surface water and groundwater quality?" is considered sufficient, given most of the borough does not contain any SPZs.
Environment Agency	Section 15.4 (Data Gaps) states that a new Water Cycle Study (WCS) is likely to be commissioned in support of the Local Plan. It is imperative that this key piece of evidence is provided to ascertain whether there is sufficient availability of water supply and capacity to treat wastewater in both the network and wastewater treatment works for growth proposed both in the Borough. A Water Cycle Study should give Tamworth Borough Council clear recommendations for new developments and any policy requirements needed. We also welcome	Comments are noted. There are no changes to scoping information required.

⁸ <https://www.data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged1>

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	reference for the need for an updated Contaminated Land Inspection Strategy.	
Environment Agency	Section 16 - Waste: The West Midlands Resources Technical Advisory Body comprises of local authorities. This group looks at the available waste capacity across West Midlands and identifies where more infrastructure is required, so will be a valuable source of information for Tamworth when preparing its waste-related evidence base for the Local Plan.	Comments are noted. There is no additional information available that has not already been included within the Scoping Report.
Environment Agency	17.0 - The Proposed SA Framework: Within Table 17.1 the proposed SA objectives use the wording 'minimise' several times, including the within objective 'SA11 Adaptation to Climate Change'. We recommend stronger wording be utilised to support the objectives. For example, 'reduction' of flood risk (SA12) is stronger as an objective and reflects national policy objectives instead of 'minimise.' The word 'minimise' implies 'minimal' action or 'doing the minimum' which is not what national policy or locally derived evidence base documents are likely to aim towards for the environment in Tamworth. Stronger active words (should, require, reduce, avoid) would promote better policy strength within the Local Plan when tested against these objectives. A review of terminology is recommended now against existing policies, but as each evidence base document is produced (Water Cycle Study, Strategic Flood Risk Assessment) the objectives and other sections of Sustainability Appraisal should be refreshed in light of new local evidence (as an iterative process). This will ensure the emerging Local Plan is being appraised utilising the latest evidence base and its recommendations.	In line with suggestions, the language within the framework has been reviewed. Wording of the third decision making consideration relating to Objective 6 (inclusion of the word 'meeting') has been amended to strengthen it (page 130). No other changes have been considered necessary or proportionate.
Environment Agency	The SA 11 sub-objectives reflect adaptation as a theme e.g. 'withstand future climate change' however, there's a major strategic step with regards to 'flood risk' which should be reflected in Tamworth's objectives. There is a requirement (e.g. National Planning Policy	Flood risk is sufficiently covered within the SA Framework including reducing flood risk and locating development

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	Framework and sequential test) to ensure new developments are sited away from areas of fluvial flood risk. This initial step of avoidance will help increase the borough's resilience to climate change, as this reduces the likelihood of communities being affected by flooding, requiring emergency services or there being a need for local authority or private investment funding to protect properties or recover from flood risk. Tamworth's SFRA will investigate the cumulative impact of developments on flood risk, and there's likely to be recommendations on achieving flood risk reductions and improvements e.g. flood storage areas, natural flood risk management. We have produced Climate Change Guidance for the West Midlands area which contains useful advisory information on this theme, with links to resources. This is attached with our response.	away from areas at risk of fluvial flooding. No change is needed.
Environment Agency	Similarly, the sub-objectives of SA16 Waste use terms such as 'enhance,' 'adequate' and 'encourage.' Our challenge is that there's a risk these become meaningless (too subjective) when appraising draft local plan policies or strategic sites if these aren't quantified or defined in some way. The alternative is to use stronger terms/wording such as 'require.'	In line with suggestions, the language within the framework has been reviewed. Wording of the third decision making consideration relating to Objective 6 (inclusion of the word 'meeting') has been amended to strengthen it (page 130). No other changes have been considered necessary or proportionate.
Environment Agency	Circular economy principles are mentioned in one of the sub-objectives, but there should be a much stronger push towards achieving a circular economy. How much closer is Tamworth to being a circular economy, versus dependence on low-waste hierarchy processes e.g. landfill and waste incineration? Growing a circular economy means reducing reliance on new raw materials and transferring to a maximum utilisation of waste as a resource, recovering more waste material for economic reuse. This leaves less waste requiring disposal. Specific interventions are available to deliver	Comments are noted. The SA framework is considered appropriate given the scope of the local plan.

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	a much more Circular Economy. Separating and sorting waste is only the first stage. It requires improved processing and manufacturing or refurbishment capacity to make use of recovered resources. However, there is no point collecting and processing recyclable materials if there is no demand for them. Therefore, how can Tamworth Borough Council help drive demand? For example, could demand for locally generated waste-derived resources be stimulated (such as through any public sector procurement contracts and if possible, preferentially specified in the construction of buildings)? Demand could be created by manufacturing industry in or near to Tamworth requiring materials that could be derived from the waste stream. This could include indigenous production of recycled packaging products to support Tamworth's local engineering and fabrication sector, or in food production. The objectives and sub-objectives should be reviewed to see how effective they would be in helping to deliver a strong circular economy in Tamworth.	
Natural England	Natural England has no specific comments to make on this SA scoping Consultation. However, Natural England notes the potential to export housing need to neighbouring authorities in Lichfield and North Warwickshire through the duty to co-operate process. It is advised that any allocations or policies which fall outside of the plan area must also be incorporated within the Sustainability Appraisal / Strategic Environmental Assessment and the Habitats Regulations Assessment. For further information please find attached Natural England's Local Plan Advice Note.	Noted, no change to scoping information required
SCC Education	[In reference to] Page 41 – The Education Map 6.6 is missing two primary schools Dunstall Park and The Garden Village	Figure 6.6 (page 41) has been amended to now also show the two additional primary schools identified. The accompanying text in Section 6.1.8 (page 40) has also been updated accordingly.

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
SCC Education	[In reference to] Page 42 – The first two paragraphs do not accurately reflect the discussion we had when we met with SLR Consulting and I am concerned may be misleading. I have suggested a possible amendment below: ‘Over the last 10 years, Tamworth has experienced a steady increase in demand for school places as a result of development, in the north and east of the town, including development just over the Borough boundary in Lichfield to the north. Over the past five years the demand has been focussed on primary provision as it is recognised that the pressure on Secondary places can take 10 to 15 years to build as the younger pupils work through the school system. The child yield used to calculate pupil generation at primary level in Tamworth is slightly higher than for the majority other Staffordshire areas at 4.5% as housing developments in Tamworth have been shown to generate a higher number of pre-school and primary age children. Demand for secondary places is expected to increase over the longer term in the north of Tamworth. In addition, a number of Tamworth pupils access school places outside of Staffordshire at year 7, the majority of which attend Secondary schools in North Warwickshire. This has traditionally been in excess of 100 pupils each year, however numbers have been reducing and the latest available data for 2024/25 shows this had dropped to just under 80. Any pushback of Staffordshire pupils from these out of county schools would cause additional pressure on the availability of Secondary places in Tamworth. There is one primary school expected to be developed over the next 3 years, in line with the Arkall Farm development, which is situated just over the Tamworth Borough boundary in Lichfield. The new school will be situated within the development, and the opening date is dependent on the time taken for the various phases of the development to come	Amendments made to wording of Section 6.1.8 (page 41) of the Scoping Report (Population and Equalities chapter) to reflect the paragraph alterations suggested.

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	forward. It is currently anticipated this school will open in September 2029'.	
SCC Education	[In reference to] Page 42 – Please could you consider renaming Figure 6-7 either in the chart title or accompanying footnote to make it clear this is data from Gov.uk (not Staffordshire County Council) for the whole of Staffordshire (not just Tamworth) and that the data is forecast using 2022/23 actuals?	Suggested change made to the footnote and figure title in Section 6.1.8 (page 43) of the Scoping Report (Population and Equalities chapter).
SCC Education	[In reference to] Page 43 – paragraph 1, please could you consider amending the paragraph as below: 'Where a new school or expansion to an existing school is proposed, these will be built as fully accessible. this will comply with accessibility regulations'	Suggested change made to wording in Section 6.1.8 (page 43) of the Scoping Report (Population and Equalities chapter)
SCC Education SEND	[In reference to] Page 43 [suggested changes to wording as follows]: Tamworth is seeing increased demand for Special Educational Needs (SEN) support, in both specialist schools and mainstream schools, in line with national trends. There are two specialist schools within the Borough, both of which are at capacity. The sixth forms at these schools are The High school is currently being expanded in order to accommodate increased pupil numbers to provide additional places for future cohorts. Tamworth's 2025/26 SEN school capacity is just over 400 places. Tamworth's current SEN school capacity, which is around 700 places, is expected to fall short by approximately 400 places by 2027.	Suggested changes made to wording in Section 6.1.8 (page 43) of the Scoping Report (Population and Equalities chapter).
SCC Education SEND	[In reference to Page 43] Replace the below: Between 2020 and 2024, Educational, Health and Care (EHC) assessments have risen significantly across Staffordshire. The most common primary need among children with an EHCP in Tamworth is autism (24.8%), followed by speech, language and communication	Amendments made to wording in Section 6.1.8 (page 43) of the Scoping Report (Population and Equalities chapter) to align with wording suggested.

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	needs (24.7%). For children with SEN support, moderate learning difficulties (22.3%) are the most prevalent primary needs. Autism is most prevalent among males, and speech, language and communication needs are most prevalent among females. There are concerns that children with SEND are not achieving the same level of academic attainment as other children in Staffordshire With [the following suggested amended wording]: Between 2020 and 2024, Educational, Health and Care (EHC) assessments have risen significantly across Staffordshire. The most common primary need among children with an EHCP in Tamworth is speech, language and communication (27.8%), followed by autism (24.1%). Speech, language and communication needs are the most prevalent among both males and females. For children with SEN support, moderate learning difficulties (25.9%) are the most prevalent primary needs. The data above is from the SEN2 data collection January 2025, Education, health and care plans, reporting year 2025 - Explore education statistics - GOV.UK	
SCC Education SEND	[In reference to Appendix B of the Scoping Report] In the table change “increase education facility provision for children with SEND” to “Increase capacity to provide education provision for children with SEND”.	Suggested change made to wording in Appendix B (page 6) in relation to SA3 Accessibility.
SCC Education SEND	[In reference to Appendix B of the Scoping Report] Please delete this: Demand for SEN support is rising, with a projected shortfall of 400 specialist school places by 2027/28? [and suggest replacing with] “Demand for SEND support is rising, with a projected shortfall of 400 specialist school places by 2027/28”.	Suggested change made to wording in Appendix B (page 7) in relation to SA3 Accessibility. Corresponding amendment also made in the SA Scoping Report Yes, suggested change made to Appendix B page 7. (SA Objective 3).

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
	[Also] replace “there is a need for more specialist schools and schools supporting pupils with complex learning difficulties” with “There is a need for more inclusive school environments to ensure all children/young people with SEND can be supported in the right place at the right time”.	Change also made in Scoping report SA Objective 3.
SCC Public Health	For the fast-food outlet density indicator, although the value of the rate is lower in Tamworth compared to England, it can be described as ‘similar to’ England, due to the overlapping confidence intervals.	Change made to analysis wording in Section 7.1.5 (page 51) of Scoping Report (Health chapter).
SCC Public Health	The infant mortality figure ‘should be treated with caution’, given the small number of events that contribute to this statistic.	Change made to analysis wording in Section 7.1.9 (page 54) of Scoping Report (Health chapter).
SCC Public Health	For the emergency admissions due to self-harm, I would add the dates- that this is based on data between 2016/17 and 2020/21.	Dates added as suggested to Section 7.1.9 (page 54) of Scoping Report (Health chapter).
SCC Public Health	Would also add in the years for hospital admissions for those with a mental health diagnosis.	Dates added as suggested to Section 7.1.9 (page 55) of Scoping Report (Health chapter).
SCC Public Health	Life expectancy is slightly lower than England but is statistically ‘similar to’ England.	Change made to analysis wording in Section 7.1.2 (page 48) of Scoping Report (Health chapter).
SCC Public Health	For teenage conceptions – I think there may be an error here- I think it is maybe in the top 5 in the West Midlands? I’ve got the under 18 conception rate as 19.4 per 1000 (similar to England) please can this be double-checked?	Amendments made to data included in Section 7.1.9 (page 54) of Scoping Report (Health chapter).
SCC Public Health	Would suggest rewording the following to be more specific to the data that we have (e.g. GP recorded depression, self-harm admissions- not sure where the multiple psychiatric disorders bit has come from: Mental health issues are rising, increasing hospital admissions. Common conditions include anxiety, depression and multiple psychiatric disorders;	Change made to wording in Section 7.1.9 (page 54) of Scoping Report (Health chapter).

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
SCC Public Health	[In reference to Appendix A] Additionally, in Appendix A under the Health and Wellbeing strategy, I would highlight what the priorities are in the strategy with more info available under each of the priorities i.e.: Staffordshire Health and Wellbeing Board has drawn on local insight, considered current health and wellbeing need and determined the following as priorities for focused attention and action. Under each priority area we identify the outcomes we want to achieve, the local community assets and partners we will work with. • Health in early life • Good mental health • Healthy weight • Healthy ageing	Change made to wording of Table 3 in Appendix A (page 23).
SCC Public Health	Under the SA framework section- I would add, does it 'promote good health, including healthy behaviours' to the point about does it promote active lifestyles. I would also add does it 'address identified local health and wellbeing needs' does it 'prevent ill-health' and does it 'reduce health inequalities between communities'.	Changes made to Table 17-1 (the SA Framework) in the Scoping Report (page 130) and corresponding wording regarding SA Objective 4 in Appendix B. These changes involve incorporating 'promoting good health, including healthy behaviours' with 'promoting active lifestyles', as well as adding 'does it reduce health inequalities between communities'. The suggested inclusion of 'Does it prevent ill health' is not considered necessary to add and would not be practical to assess in the SA which is a strategic assessment. Similarly, the suggested addition of 'does it address identified local health and wellbeing

Consultee	Comment	Response/ Schedule of Changes to SA Scoping Report
		needs' is considered too detailed for the SA. The latter would be more suitable to assess in a standalone health impact assessment of either the local plan or at the project level. In both of these cases, no amendments have therefore been made to the Scoping Report.

B.2 Responses to the Interim SA Report Consultation

Table B.2: Responses to Interim SA Report Consultation (June-July 2026)

Consultee	Comment	Schedule of Changes to SA Scoping Report
Historic England	HE welcomes that the historic environment has been incorporated as part of the Sustainability Appraisal process and is pleased to see the inclusion of a specific SA Objective for the historic environment (SAO 14) as well as a specific SA objective for landscape and townscape (SAO15). We are also pleased to see that the various residential site options and the employment site option have been assessed in relation to impacts on the historic environment and also in relation to impacts on landscape and townscape character. However, please see below for further comments on this.	Comments noted. No further action required.
Historic England	Whilst the SA and the Local Plan both acknowledge the regeneration opportunities and development site options that are located within or near to the Tamworth Town Centre Conservation Area (TTCCA), the SA Report omits to mention opportunities to address heritage at risk through the Local Plan, as does the Local Plan itself. We note that the TTCCA is classed as vulnerable in terms of heritage at risk, and we suggest that both Local Plan and the SA should reference opportunities to address this.	In line with the recommendation identified in the Interim SA Report, the strategic heritage policy has been refined to include explicit reference to heritage assets at risk, confirming that proposals which secure their conservation and safeguard their significance will be supported. The SA Framework already includes a decision-making criterion under SAO14 relating to improving the condition of the historic environment, including heritage at risk, and this remains appropriate with no further amendments required.
Historic England	Furthermore, we are unclear as to whether the assessments within the SA Interim Report have included consideration of non-designated heritage assets, such as archaeological remains or locally listed	Assessments undertaken at the Pre-Submission stage include consideration of non-designated heritage assets, informed by liaison with our Conservation Officer.

	buildings. The narrative under SAO 14 Historic Environment at paragraphs 5.2.43 5.2.47 seems to suggest not.	
Historic England	HE would endorse the ‘SA Recommendations’ for the historic environment policies of the Local Plan (SPD1, PD1, PD2, PD3 and PD4) included in table 7.2 of the SA Report, much of which reflects our comments above and our comments on the policy directions themselves. However, whilst we support the recommendation for Policy Direction SPD1 that proposals affecting a heritage asset or its setting be accompanied by a proportionate heritage statement, we are unclear whether the Council has undertaken any assessments specifically relating to heritage for the potential site allocations identified in the Local Plan. We have commented on this in our response to the recent Local Plan consultation and consider that this evidence would enable a far more robust SA of potential sites to be undertaken. For example, in relation to “Table 5.12: Summary of Likely Effects for all Site Options” we note that many are scored as having 0/neutral or negligible effects or ?/uncertain effects, both for SAO 14 and SAO 15 and we consider that, as mentioned above, assessments specifically relating to heritage should be undertaken and used to inform the SA.	The Pre-Submission Local Plan includes potential site allocations, with the Regulation 18 site appraisals used as the baseline and updated where new information warrants. Amendments reflect new evidence, including an initial scoping exercise undertaken by the Council’s Conservation Officer in anticipation of a full Heritage Impact Assessment, which is currently in the process of being procured.
Historic England	As we have set out in our response letter to the Local Plan consultation, to ensure that plans are positively prepared, HE advises undertaking the process of the ‘Site Selection Methodology’ as set out in Historic England’s Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3): https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/	Following the Interim SA Report, an initial scoping exercise has been undertaken by the Council’s Conservation Officer to help inform the SA and site selection. This work precedes a formal Heritage Impact Assessment being carried out, which is currently being procured.

	We would also recommend that detailed Heritage Impact Assessments (HIAs) are prepared for a number of the potential housing sites and have included a list of these we recommend for assessment in our response letter to the Local Plan consultation.	
--	--	--