

Tamworth Borough Local Plan Sustainability Appraisal

Appendix E

Recommendations Identified at the
Interim SA Stage and Schedule of Changes

August 2026

E.1 Recommendations Identified at the Interim SA Stage

E.1.1 The SA process identified a number of recommendations at the Advanced Regulation 18 stage. These are summarised in Table E.1, with the Council's response explaining how they have informed the development of the Pre-Submission Local Plan. As the responses relate to the refined policies in the Pre-Submission Local Plan, they reference the current policy numbers rather than the broader policy direction identifiers used at Regulation 18.

Table E.1: Interim SA Report (June 2026) Recommendations and Responses

Topic	Policy Direction	Interim SA Report Recommendation	Resulting Refinement of Emerging Plan
Vision/Objectives	N/A	The TBLP Vision may result in potential conflicts between growth, resource use and environmental factors. The effects are highly dependent on how economic, social and environmental sustainability are balanced. In this regard, the TBLP Vision could place more explicit emphasis on the promotion of sustainable development as an underpinning theme, or a TBLP Objective could be added to this end.	This recommendation has been incorporated. The first paragraph of the TBLP Vision has been amended to place greater emphasis on sustainable development. It now explicitly states that growth will be pursued in a sustainable manner, with the aim of balancing environmental, social and economic considerations as effectively as possible. This amendment strengthens the role of sustainable development as an overarching principle of the Vision.
Vision	N/A	The TBLP Vision could be enhanced through incorporating stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, such as seeking opportunities for heritage-led regeneration. Although this is referenced in TBLP	This recommendation has been incorporated. Reference to heritage has been given greater prominence within the Vision by moving it from its original placement into a standalone paragraph. The text has also been expanded to provide greater detail on the

		Objective 5, heritage is of particular importance to Tamworth, especially in areas of proposed change such as the town centre.	borough's aspirations for conserving and enhancing the historic environment.
Vision/Objectives	N/A	The TBLP Vision or Objectives do not directly reference waste or recycling. Wording could be incorporated to recognise the role that the TBLP can play in helping to minimise waste generation and promoting circular economy principles.	No amendments have been made in response to this recommendation. It is considered that waste management, waste minimisation and circular economy principles are adequately reflected through the supporting policies of the emerging plan.
Vision	N/A	The TBLP Vision does not directly reference social cohesion, although this is included within TBLP Objective 9. TBLP Objective 9 was created as a response to the period of rioting in Tamworth during the Summer of 2024. The TBLP Vision may similarly benefit from greater expansion on the Council's renewed ambitions for greater social cohesion and achievement of connected communities.	This recommendation has been incorporated. The Vision has been refined to include an explicit reference to social cohesion and connected communities. This reflects the Council's renewed ambitions for fostering strong, inclusive communities and ensures greater alignment between the Vision and TBLP Objective 9.
Vision	N/A	Although the conservation of natural environments and the importance of green infrastructure are highlighted through the TBLP Vision and Objectives, it is suggested that wording could be included to recognise the importance of conserving and improving air and water quality for both human and ecosystem health.	No amendments have been made in response to this recommendation. Air and water quality are considered to be sufficiently addressed through the emerging policies of the TBLP, which include measures to protect and enhance the natural environment and support healthy communities.

Vision	N/A	The TBLP Vision would benefit from reference to the importance of blue infrastructure. Tamworth has a wealth of urban water infrastructure, and its protection and enhancement will be an important priority.	This recommendation has been incorporated. The Vision has been refined to include an explicit reference to blue infrastructure.
Vision/Objectives	N/A	The TBLP Vision or Objectives do not directly reference crime or feelings of safety. Wording could be incorporated to recognise the role that the TBLP can play in helping to create safer communities, both physically and by perception.	This recommendation has been incorporated. A reference to creating safe communities has been incorporated into the Vision. Further detail on how this will be delivered is provided through the supporting policies.
Objectives	TBLP Objective 8	Consider adding an explicit spatial dimension to TBLP Objective 8, which could maximise its contribution to encouraging sustainable travel patterns. This could include reference that local services and community facilities are in accessible and sustainable locations. Also consider including reference to the enhancement of local services and community facilities, as well as their provision and protection.	This recommendation has been partially incorporated. TBLP Objective 8 has been amended to include reference to the enhancement of local services and facilities. The recommendation to include a spatial dimension has not been incorporated, as locational and accessibility considerations are addressed elsewhere in the emerging plan and would broaden the scope of this objective.
Objectives	TBLP Objective 10	The positive sustainability effects of TBLP Objective 10 could be strengthened by rewording to place specific emphasis on connectivity. While not essential, clarifying the expectation that these assets should function as coherent routes rather than	This recommendation has been incorporated. TBLP Objective 10 has been refined to include an explicit reference to the connectivity of green and blue linkages and open spaces.

		isolated areas would strengthen their role in supporting sustainable travel modes and more likely deliver associated benefits for air quality and carbon emissions. Improved connectivity would also maximise the positive effect on ecological linkages.	
Heritage	SPD1 Securing the Conservation and Enhancement of Heritage Assets	Consider requiring proposals that affect a heritage asset or its setting to be accompanied by a proportionate heritage statement.	This recommendation has been incorporated. The requirement for a proportionate heritage statement has been incorporated into the policy, with additional detail added into the supporting text of Strategic Policy SP7.
Heritage	SPD1 Securing the Conservation and Enhancement of Heritage Assets	More generally, the heritage section would benefit from referencing non-designated archaeological assets, including buried or undiscovered remains. Although this would not necessarily be best placed under the strategic policy, the Council may wish to consider adding an additional policy to this end. This could include a requirement for a desk-based assessment and, where necessary, a field evaluation to establish the significance of any remains. Any future policy should also set out expectations for circumstances where preservation in situ is not feasible.	This recommendation has been incorporated. A reference to archaeological assets has been incorporated into the supporting text accompanying Policy HE2. Strategic Policy SP7 has also been amended to include a general requirement for proportionate assessments, with further detail on the scope and application of these requirements provided within the supporting text.
Heritage	PD1 Proposals Affecting	Consider including explicit reference to heritage assets at risk, ensuring that	This recommendation has been incorporated. Strategic Policy SP7 has been

	Designated Heritage Assets	proposals which secure their conservation and safeguard their significance are supported.	revised and to include explicit support for proposals that secure the conservation of, and safeguard the significance of, heritage assets identified as being at risk.
Heritage	PD3 Loss or Removal of Heritage Assets	Consider requiring applicants to work with a suitably qualified heritage specialist to ensure that any recording of a lost asset is accurate and meaningful. This is likely to improve the quality of information captured and strengthen the positive effect on the historic environment (SAO14).	This recommendation has been incorporated. The requirement for applicants to work with a suitably qualified heritage specialist has been incorporated into the supporting text of Strategic Policy SP7.
Heritage	PD4 Conservation Areas	Consider clarifying the scope of “other features” by explicitly recognising the contribution of the natural environment (such as trees, hedgerows, verges, and other landscape elements) both within and surrounding conservation areas. This would reinforce the policy’s influence on SAO15 and introduce a minor positive effect for biodiversity (SAO13).	This recommendation has been incorporated. The supporting text to Policy HE3 has been revised to explicitly recognise the contribution of natural features to the character and significance of conservation areas.
Heritage	PD4 Conservation Areas	Consider including an explicit reference to the setting of conservation areas, ensuring that potential impacts on character and appearance are assessed comprehensively.	This recommendation has been incorporated. The wording of Policy HE3 has been refined to explicitly refer to the setting of conservation areas, in addition to the conservation areas themselves.
Heritage	PD4 Conservation Areas	Consider referencing relevant Conservation Area Appraisals to ensure the key features	This recommendation has been incorporated. Policy HE3 has been refined to

		that contribute to each conservation area's special interest and significance are clearly understood. This would strengthen their consideration and protection, reinforcing the positive effect on maintaining and enhancing the distinctiveness of the area (SAO15).	direct applicants to the relevant Conservation Area Appraisal.
Flooding	PD7 Sustainable Drainage Systems and Watercourses	Consider requiring SuDS to be integrated into developments that are at risk of flooding. This would enhance the performance of the direction against SAO12 and SAO11.	This recommendation has been partially incorporated. A broad reference to the involvement of the lead local flood authority in the design and placement of SuDS has been integrated within Policy FL3.
Flooding	PD7 Sustainable Drainage Systems and Watercourses	Consider greater explicit reference to the protection and enhancement of watercourses, to better align with the scope of the direction. This would enhance the performance of the direction against SAO9, SAO11, SAO13 and SAO15.	This recommendation has been incorporated. Policy FL3 has been amended to include explicit references to the protection and enhancement of watercourses and to strengthen policy requirements relating to water quality.
Flooding	PD7 Sustainable Drainage Systems and Watercourses	Consider stating that SuDS should be designed, where appropriate, to support the delivery of the local nature recovery strategy. This would strengthen the performance of the direction against SAO11, SAO13 and SAO15.	No amendments have been made in response to this recommendation. Policy FL3 contains detailed requirements relating to the design and delivery of sustainable drainage systems (SuDS). The importance of supporting the delivery of the Local Nature Recovery Strategy is also addressed elsewhere in the emerging policies of the plan, and it is therefore considered that additional policy wording is not necessary.

Nature and Biodiversity	SPD2 Protecting the Natural Environment	The policy direction could more explicitly recognise the role of designated sites and habitats as part of a wider ecological network and encourage development to support or enhance ecological connectivity in line with the LNRS. This could maximise positive effects on SAO13.	This recommendation has been incorporated. The supporting text to the ‘Protecting the Natural Environment’ chapter has been amended to recognise designated sites and habitats as part of connected ecological networks, reinforcing the importance of ecological connectivity alongside the protection of individual assets.
Nature and Biodiversity	SPD2 Protecting the Natural Environment	Consider strengthening the direction by explicitly referencing the protection and enhancement of important but undesignated habitats. This may include priority habitats and LNRS-identified areas. This could maximise positive effects on SAO13.	No amendments have been made in response to this recommendation. The protection and enhancement of non-designated habitats is addressed through more detailed policies elsewhere in the plan.
Nature and Biodiversity	PD9 Areas of Particular Importance for Biodiversity	Consider a requirement for a proportionate ecological assessment to evidence that no harm has occurred. This would secure the major positive effect on SAO13.	This recommendation has been incorporated. An appropriate hook has been added to Policy NE2 to enable the requirement for assessments to be secured through the Local List of Information Requirements.
Nature and Biodiversity	PD9 Areas of Particular Importance for Biodiversity	Consider clarifying in the supporting text how important but undesignated habitats will be considered in decision-making, given the broad scope implied by the title of the policy direction.	No amendments have been made in response to this recommendation. The matter is considered to fall outside the scope of the original direction, and is already addressed in broader terms within policies across the wider ‘Protecting the Natural Environment’ chapter (NE2, NE5 and NE6). Following review, no additional changes are considered necessary.

Community Facilities	PD14 Community Facilities and New Development	Although the policy direction recognises the need for the right type of community facilities in new developments, it does not explicitly address how or where these facilities should be located in order to be effective or sustainable. Although much of this will be addressed on a site-by-site basis, the direction could reference the need for facilities to be integrated with sustainable travel routes, accessible for all different types of potential users, and aligned with other aspects of the built form in a way that encourages facilities to be a focal point of community interaction. This would strengthen the positive effect of the direction on both SAO3 and SAO4.	No amendments have been made in response to this recommendation. It is considered that these matters are more appropriately addressed through other policies in the plan, which provide detailed requirements relating to the accessibility of development.
Community Facilities	PD15 New and Improved Community Facilities	Consider encouraging new local small-scale shops to be located in accessible places, such as along active travel routes or within walking distance of residential and employment areas. This would strengthen the positive effect on health (SAO4) and potentially introduce a positive effect for sustainable travel (SAO7).	This recommendation has been incorporated. Policy HC3 has been refined to specify that small-scale shops should respond to an identified need and be located where they are accessible by walking, cycling and public transport.
Community Facilities	PD15 New and Improved Community Facilities	Consider referencing accessibility by walking and cycling to encourage sustainable travel to new community facilities. This would strengthen the positive effect on health (SAO4) and potentially	This recommendation has been incorporated. Policy HC3 has been refined to specify that new community facilities should be located where they are accessible by walking, cycling and public transport.

		introduce a positive effect for sustainable travel (SA07).	
Community Facilities	PD15 New and Improved Community Facilities	Encourage good design principles where new community facilities are proposed, ensuring that they are inclusive, adaptable and responsive to changing needs over time. This would reinforce long-term positive effects on health and community cohesion (SA04).	This recommendation has been partially incorporated. The principles of inclusive, adaptable and responsive design are already adequately addressed through the plan's overarching design policies, which apply to all forms of development. A change to the policy is therefore considered unnecessary. However, a general reference has been incorporated into the supporting text of Policy HC3.
Community Facilities	PD15 New and Improved Community Facilities	Consider encouraging new community facilities to be designed and located so that they are accessible to all groups within the community, while recognising that some facilities will appropriately serve specific user groups and should be planned to meet their particular needs.	No amendments have been made in response to this recommendation. The principles of accessible and responsive design are already adequately addressed through the plan's overarching design policies, which apply to all forms of development. The emerging policy framework is therefore considered to adequately address the intent of this recommendation.
Community Facilities	PD16 Development Affecting Existing Community Facilities	Consider clarifying that the assessment of 'reasonable distance' should consider safe and convenient walking and cycling routes, ensuring that alternative provision is genuinely accessible without reliance on car travel.	This recommendation has been incorporated. The supporting text to Policy HC1 has been amended to clarify the interpretation of 'reasonable distance', providing greater certainty as to how the policy should be applied.

Community Facilities	PD16 Development Affecting Existing Community Facilities	Although the direction seeks to prevent the loss of community services and facilities, it could consider the social groups who use the service or facility. For example, the locality for the elderly may be a much smaller area than other social groups.	This recommendation has been incorporated. The supporting text to Policy HC1 has been amended to clarify the interpretation of 'reasonable distance', providing greater certainty as to how the policy should be applied.
Pollution, Ground Conditions, Minerals and Soils	PD18 Ground Conditions and Contamination	Expand the wording of the direction to ensure that any mitigation measures identified through ground investigation are actually secured and implemented as part of the development, to strengthen outcomes for SAO9 and SAO4. Remediation is only effective if it is verified.	This recommendation has been incorporated. The wording of Policy EP2 has been expanded to require that appropriate remediation/mitigation be secured.
Pollution, Ground Conditions, Minerals and Soils	PD19 Managing the Impacts of Development	Consider explicit reference that the pollution impacts on sensitive receptors, including vulnerable population groups and environmental assets, should be assessed and addressed where relevant. This would strengthen the directions performance against SAO4 and introduce a minor positive effect on protecting biodiversity (SAO13).	No amendments have been made in response to this recommendation. Following consideration, it was concluded that the intent of the recommendation is already addressed through the overarching requirement that development should not give rise to unacceptable impacts on land users, neighbouring uses or the environment. No further policy amendment is therefore considered necessary.
Pollution, Ground Conditions, Minerals and Soils	PD19 Managing the Impacts of Development	While the policy includes water pollution within its scope and prevents development that would lead to harmful effects, its influence is more general and less targeted than for other forms of pollution. Therefore,	This recommendation has been partially incorporated. References to watercourses, Sustainable Drainage Systems (SuDS) and water quality have been added to the policy links

		the Council may wish to consider a cross-reference to the relevant policies in the TBLP that address SuDS, watercourse protection and surface-water management. This would help to ensure that water pollution considerations are applied consistently, as well as strengthening the direction's influence on water quality outcomes.	section attached to Policy EP1 to support the interpretation and implementation of the policy.
Pollution, Ground Conditions, Minerals and Soils	PD19 Managing the Impacts of Development	Include supporting text clarifying that cumulative pollution impacts should be assessed with reference to local baseline evidence.	This recommendation has been incorporated. The importance of local baseline evidence in respect of cumulative effects has been added to the supporting text of Policy EP1.
Sport, Leisure and Recreation	PD21 Existing Sport, Leisure and Recreational Facilities	Consider clarifying that “equivalent or better provision” must be at least as accessible to the community as the existing facility. This would reinforce a positive effect on SAO3, as well as introduce modest positive effects for sustainable travel (SAO7).	This recommendation has been incorporated. An explicit reference to accessibility has been added to the wording of Policy HC5.
Sport, Leisure and Recreation	PD22 Provision of New Facilities	Consider clarifying that new facilities should maximise opportunities for access by walking, cycling and public transport. Although the direction already references sustainable travel connections, making this expectation more explicit would strengthen support for SAO7.	This recommendation has been incorporated. An explicit reference to sustainable travel opportunities has been added to the wording of Policy HC7.

Gypsies, Travellers and Travelling Showpeople	PD27 Approach to Gypsy and Traveller Sites	The direction could provide clearer guidance on what constitutes appropriate access to key services, infrastructure and transport, including education, healthcare, water supply, waste disposal and opportunities for sustainable travel. This would strengthen the positive effects for SAO3, SAO4 and SAO7 by giving applicants and decision-makers a clearer understanding of the level and type of connectivity expected to support economically, socially and environmentally sustainable locations.	No recommendations have been made in response to this recommendation. The scope of the direction has changed as it has evolved into a policy, and the recommendation is therefore no longer applicable. Strategic Policy SP3 now defers to national policy on Green Belt Matters.
Retail, Town Centre and Local Centres	PD35 Development in Local Centres	Consider strengthening expectations regarding inclusive and accessible development. This would ensure that development with local centres benefits all users and supports more equitable access to services. This would enhance performance of the direction against both SAO3 and SAO5.	This recommendation has been partially incorporated. Policy TC6 has been refined to include reference to accessibility by sustainable modes of transport. Beyond this, the principles of inclusive design are already adequately addressed through the plan's overarching design policies, which apply to all forms of development. A change to the policy is therefore considered unnecessary.
Retail, Town Centre and Local Centres	PD35 Development in Local Centres	Consider strengthening support for active and sustainable travel to and within local centres. This would reinforce the direction's focus on meeting daily needs locally and would enhance the positive effect for SAO7 by supporting more sustainable patterns of movement.	This recommendation has been incorporated. Policy TC6 has been refined to include reference to accessibility by sustainable modes of transport.

Retail, Town Centre and Local Centres	PD39 Pride in Place	Consider strengthening expectations around inclusive and accessible design. This would help ensure regeneration benefits all users and improves equitable access to services and movement, enhancing performance against SAO3.	No amendments have been made in response to this recommendation. The principles of accessible and inclusive design are already adequately addressed through the plan's overarching design policies, which apply to all forms of development. The policy framework is therefore considered to adequately address the intent of this recommendation.
Retail, Town Centre and Local Centres	PD39 Pride in Place	Consider explicitly referencing support for public realm improvements, in order to clarify the direction's intent regarding the quality of streets and spaces. This would introduce a positive yet localised effect on townscape (SAO15).	No amendments have been made in response to this recommendation. Public realm improvements are already adequately addressed through the plan's overarching design policies, which apply to all forms of development. Policy HC8 also specifically refers to public realm across all developments. The policy framework is therefore considered to adequately address the intent of this recommendation.
Design	PD42 Public Realm	Consider clarifying that crime-prevention measures should be balanced with good design quality. Ensuring that these interventions also maintain the visual quality and inclusiveness of public spaces would help to secure more sustainable long-term outcomes for overall place quality.	Amendments have been made in response to this recommendation. Policy HC8 has been amended to include an explicit reference to design quality. The remainder of the recommendation has been incorporated through additions to the supporting text.
Design	PD42 Public Realm	Consider referencing the role that public space plays in providing opportunities for	Amendments have been made in response to this recommendation. References to social interaction in respect of public realm have been

		social interaction. This would reinforce positive outcomes for SAO4 and SAO5.	incorporated into the supporting text of Policy HC8.
Open Spaces and Green and Blue Links	PD45 Protection and Enhancement of Existing Open Space	Consider encouraging the incorporation of nature-based solutions, such as SuDS and naturalised planting within open space enhancements. This would strengthen benefits for climate mitigation (SAO10) and flood risk management (SAO12), whilst further supporting positive effects on biodiversity (SAO13). It would also introduce minor positive effects on air (SAO8) and water quality (SAO9).	Amendments have been made in response to this recommendation. The scope of the original policy direction has been incorporated into Policy HC5 alongside provisions for sports and recreation. A corresponding reference to supporting multifunctional use has been added to Policy HC5.
Open Spaces and Green and Blue Links	PD45 Protection and Enhancement of Existing Open Space	Consider promoting improved walking and cycling connections to open spaces as part of enhancement proposals, helping to reinforce the contribution to accessibility (SAO3) and introduce a minor positive effect on sustainable travel (SAO7).	Amendments have been made in response to this recommendation. Reference to accessibility is included in Policy HC5.