

Tamworth Borough Local Plan Sustainability Appraisal

Main Report

Sustainability Appraisal of
Pre-Submission Local Plan

August 2026

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Chapter 1: Introduction

1.1. Overview

- 1.1.1. Tamworth Borough Council ('the Council') is preparing a new local plan ('TBLP') for Tamworth. The TBLP will set out the vision, objectives, planning policies and site allocations that will guide development in the borough over the period to 2043.
- 1.1.2. The first stage in preparing the TBLP was the Issues and Options consultation in September 2022, which outlined the key challenges facing the borough and presented high-level emerging strategic options concerning the quantum and distribution of development. Building on this early engagement, the Council undertook a further Regulation 18 consultation between March and June 2026. This stage refined earlier options and approaches in response to updates to the evidence base and national policy, and presented the emerging direction of the TBLP through revised growth figures, distribution mechanisms, draft policy directions and a range of site options. Following consideration of the comments received, the Council has prepared the Pre-Submission Local Plan. This has now been published for consultation.
- 1.1.3. As part of the preparation of the TBLP, the Council has a statutory obligation to undertake a Sustainability Appraisal ('SA') incorporating the requirements of Strategic Environmental Assessment ('SEA'). The SA is an iterative and systematic assessment undertaken during the preparation of local plans and spatial development strategies. It assesses the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. In doing so, the SA informs decisions on the scale, distribution and location of future development in the borough and identifies measures to avoid, minimise or mitigate potential negative effects, as well as opportunities to enhance the plan's contribution to sustainable development.
- 1.1.4. The SA process has iteratively informed the development of the TBLP to this stage. An appraisal was undertaken of the emerging direction of the plan set out at the Advanced Regulation 18 consultation and the findings were reported in the Interim SA Report (June 2026). This SA Report presents the findings of the appraisal of the Pre-Submission Local Plan.

1.2. Purpose of this SA Report

- 1.2.1. At the current stage of plan-making, the Council has prepared the Pre-Submission Local Plan, which will be subject to consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations. Following this, the Council will finalise the plan and submit it to the Secretary of State for Examination.
- 1.2.2. The purpose of this SA Report is to appraise the sustainability implications of the objectives, policies and proposed site allocations that comprise the Pre-Submission Local Plan. At this stage, a full SA Report is required to set out the appraisal undertaken throughout plan-making.

1.2.3. To this degree, the broad purposes of the SA are:

- To ensure that the likely significant environmental and socio-economic effects of the TBLP and any reasonable alternatives are identified, characterised and assessed;
- To help identify appropriate measures to avoid, reduce or mitigate adverse effects and to enhance beneficial effects associated with the implementation of the TBLP wherever possible;
- To provide a framework for monitoring the potential significant effects arising from the implementation of the TBLP;
- To inform decisions on the TBLP; and
- To demonstrate that the TBLP has been developed in a manner consistent with compliance with the requirements of the SEA Regulations.

1.2.4. More specifically, this SA Report sets out:

- An overview of the TBLP;
- A review of relevant international, national, regional, sub-regional and local plans, policy and programmes;
- Baseline information for the plan area across key sustainability topics;
- Key economic, social and environmental issues relevant to the appraisal of the TBLP;
- The approach to undertaking the appraisal of the Pre-Submission Local Plan;
- The findings of the appraisal of the Pre-Submission Local Plan; and
- Conclusions and an overview of the next steps in the SA process.

1.3. Sustainability Appraisal

The Requirement for Sustainability Appraisal

1.3.1. Under Section 19 (5) the Planning and Compulsory Purchase Act 2004, a SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the Strategic Environmental Assessment (SEA) Regulations (as amended). It is therefore a legal requirement for the new TBLP to be subject to both a SA and a SEA throughout its preparation.

Sustainability Appraisal and Strategic Environmental Assessment

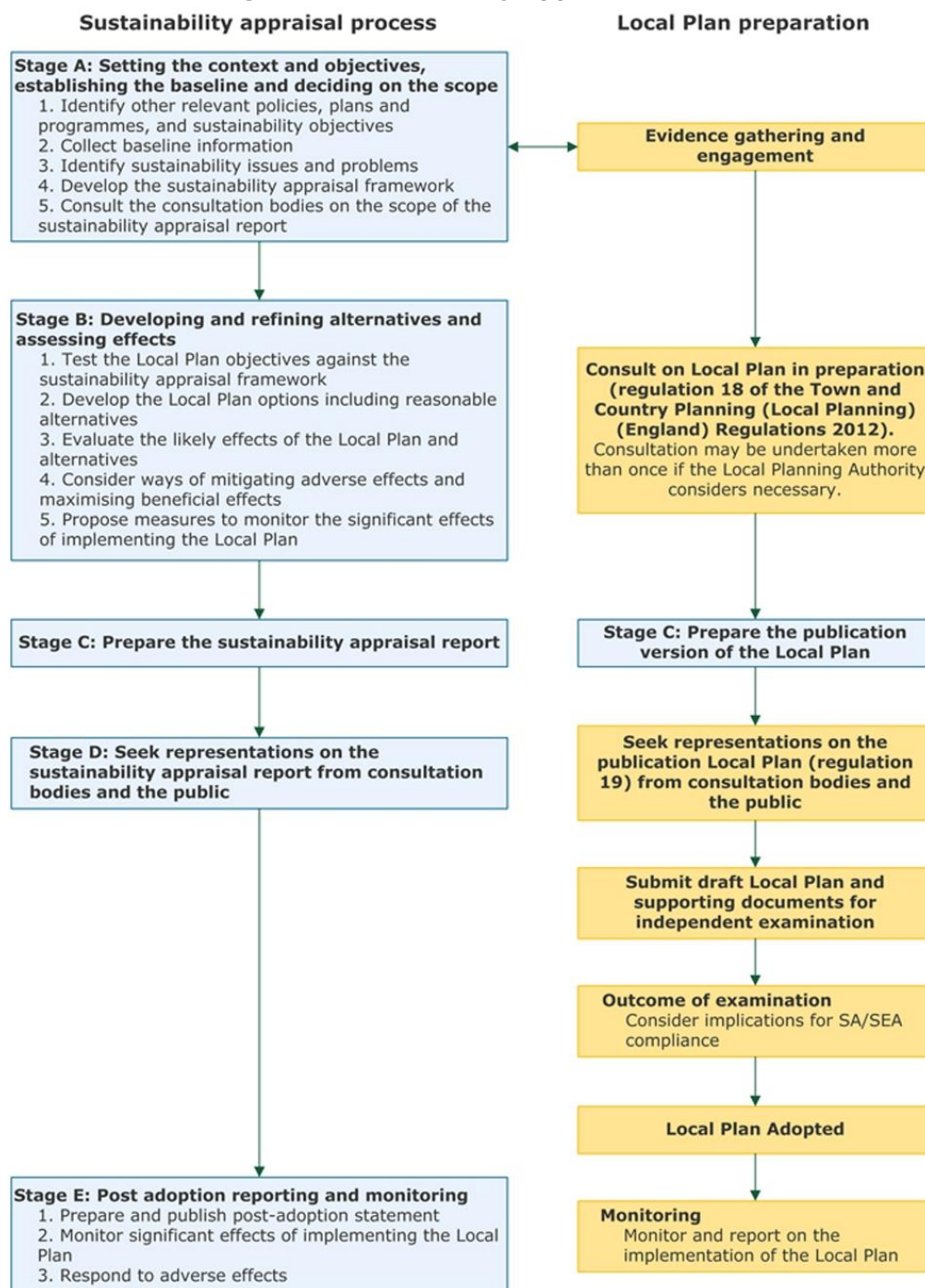
1.3.2. Both the SA and the SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. The SEA only considers the environmental effects of a plan, while the SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. The SA should meet all requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, so a separate SEA should not be required. An approach which satisfies the requirements for both the SA and SEA is advocated in the Government's Planning Practice Guidance (PPG). Practitioners can comply with the requirements of the SEA Regulations through a single integrated SA process - this is the process that is being undertaken by Tamworth Borough Council. From

here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

1.4. Stages in the Sustainability Appraisal Process

- 1.4.1. The PPG¹ specifies five key stages (A to E) of work that must be undertaken during the SA of any local plan. These are highlighted in Figure 1, with a brief overview of each stage provided below.

Figure 1: Sustainability Appraisal Process²



¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

² Source: Strategic Environmental Assessment and Sustainability Appraisal Guidance (GOV.UK)
<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Early Sustainability Work at the Issues and Options Stage

- 1.4.2. Early sustainability work was undertaken to support the Issues and Options stage of plan-making. This proportionate internal exercise preceded the formal SA Scoping stage and provided an initial indication of broad sustainability implications associated with emerging strategic options. It helped to guide early plan development by identifying potential sustainability considerations and informing the refinement of high-level options. The published Issues and Options material (2022) reflects the sustainability considerations identified through this early work.

Stage A: Scoping

- 1.4.3. The Sustainability Appraisal of the emerging TBLP commenced in July 2025 with the appointment of SLR Consulting Ltd to undertake Stage A of the process. This stage defined the scope and level of detail for the appraisal through a review of relevant plans, policies and programmes (PPP), compilation of baseline information across the SEA Directive topic areas, and identification of key sustainability issues and opportunities for Tamworth. This work informed the development of the SA Framework, comprising the SA Objectives and associated decision-making considerations that underpin the subsequent stages of the appraisal. The SA Framework is provided in Appendix D.
- 1.4.4. A Draft SA Scoping Report was published for consultation in November-December 2025. Statutory consultation bodies (Historic England, Environment Agency and Natural England) and stakeholders involved in baseline preparation were invited to comment. All comments received, together with officer responses, are provided in Appendix B.
- 1.4.5. The Scoping Report was subsequently updated to reflect the consultation feedback, and the final version was published in February 2026. Amendments made following consultation are also recorded in Appendix B.
- 1.4.6. The scope of the SA has been kept under review throughout preparation of the TBLP. The review of PPP, baseline information and sustainability issues has been revisited during the preparation of this Regulation 19 SA Report. This review confirmed that the material set out in the earlier Scoping work remains appropriate and up to date for the purposes of the appraisal, given the short interval between the two documents and the absence of any substantive changes in the evidence base. The most recent versions of the PPP and baseline information are accordingly provided in the Scoping Report (February 2026) and its supporting appendices, which is reproduced in Appendix C. The key sustainability issues for Tamworth are also summarised in Chapter 3.

Stage B: Developing and Refining Alternatives and Assessing Effects

- 1.4.7. Stage B is an iterative process involving the development, refinement and appraisal of reasonable alternatives and emerging approaches for the TBLP. An Interim SA Report (June 2026) was prepared to support the Advanced Regulation 18 consultation and presented the appraisal of emerging options.
- 1.4.8. The Interim SA Report was published for consultation between June and July 2026. Statutory consultation bodies and the stakeholders engaged at the Scoping stage

were invited to comment. Historic England provided comments, and Natural England confirmed it had no specific comments. No other responses were received. All comments, together with the Council's responses, are provided in Appendix B.

- 1.4.9. The Interim SA noted that further options were still being developed and that additional reasonable alternatives would be identified as the evidence base progressed. Since the Advanced Regulation 18 stage, the Council has refined earlier options and developed additional reasonable alternatives. Some of these refined options are introduced and appraised for the first time in this Regulation 19 SA Report.
- 1.4.10. Stage B therefore continues through this SA Report, with further appraisal undertaken as new evidence becomes available and the emerging TBLP is refined.

Stages C (Preparing the SA Report), D (Consultation) and E (Monitoring)

- 1.4.11. Stage C involves preparing the final SA Report to accompany the Pre-Submission Local Plan at Regulation 19. This SA Report presents the findings of the appraisal of the Pre-Submission Local Plan, including the refined reasonable alternatives. The preparation and publication of this SA Report therefore constitute Stage C of the SA process.
- 1.4.12. Stage D comprises consultation on the Pre-Submission Local Plan and this SA Report.
- 1.4.13. Stage E takes place following Examination and adoption. The Council will prepare a Post-Adoption Statement setting out how environmental considerations and consultation responses have been taken into account, and identifying measures for monitoring the significant social, economic and environmental effects of implementing the TBLP.

1.5. Habitat Regulations Assessment (HRA)

- 1.5.1. A separate Habitat Regulations Assessment (HRA) has been undertaken alongside preparation of the TBLP in accordance with the Conservation of Habitats and Species Regulations 2017. Screening was carried out at Regulation 18 and Regulation 19 to determine whether the local plan is likely to have significant effects on any site within the National Site Network, either alone or in combination.
- 1.5.2. There are no National Site Network sites within Tamworth Borough, but in line with the precautionary approach, the screening assessments considered a small number of European sites near the borough boundary. The HRA concluded that the Pre-Submission Local Plan is not likely to have significant effects on any of these sites, either alone or in combination, and that no changes to the plan are required.
- 1.5.3. The outcome of the HRA confirms that there are no implications for the SA, and no additional mitigation is required beyond that already embedded in the plan. A standalone HRA Report accompanies this SA Report and can be viewed separately.

1.6. Structure of the SA Report

1.6.1. This SA Report is structured as follows:

- **Chapter 1** provides an overview of the new local plan, the requirement for SA and the stages involved.
- **Chapter 2** describes the preparation of the TBLP to date and presents the key components of the Pre-Submission Local Plan.
- **Chapter 3** presents the key information from the Scoping stage, including the key sustainability issues for the borough.
- **Chapter 4** presents the approach that is being taken to the SA of the Pre-Submission Local Plan.
- **Chapter 5** summarises the identification and consideration of reasonable alternatives throughout the plan-making process, including the appraisal of the preferred approach.
- **Chapter 6** presents the SA findings for the Pre-Submission Local Plan, including the appraisal of the vision and objectives, site allocations, cumulative effects and associated mitigation and enhancement measures.
- **Chapter 7** presents the conclusions of the SA at this stage, outlines the proposed monitoring arrangements, and describes the next steps in the SA process.

1.6.2. This SA Report has been prepared in accordance with the requirements of the SEA Directive and associated Regulations. A Quality Assurance Checklist is presented at Appendix A.

Chapter 2: The Tamworth Borough Local Plan

2.1. Introduction

- 2.1.1. The Council is currently preparing a new local plan for the borough that will, once adopted, replace the Tamworth Borough Local Plan which was adopted in 2016 and covers the 2006 to 2031. The new local plan will guide growth and development in the borough for the period up to 2043. It is anticipated it will provide:
- The vision for the borough by 2043 and a set of strategic objectives;
 - The overall spatial strategy and growth requirements;
 - A set of strategic and development management policies to help shape development;
 - A range of allocations for housing and employment to meet the identified requirements; and
 - A Policies Map showing relevant allocations and designations.

2.2. Development of the TBLP

- 2.2.1. A revised Local Development Scheme (LDS) was adopted by the Council in February 2026. The LDS sets out the timetable for preparing the local plan in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.2.2. The first formal stage in preparing the local plan was the Issues and Options consultation undertaken in September 2022. This stage sought views on the key challenges facing the borough and potential approaches to addressing them. It presented high-level options for housing and employment growth, broad spatial distribution choices, and early policy direction across themes including climate change, housing and retail. It also introduced an initial draft vision and set of emerging strategic objectives.
- 2.2.3. Following the Issues and Options stage, progress slowed while the Government consulted on proposed reforms to the plan-making system. During this period, further evidence gathering was commissioned and technical work progressed to support the next stage of plan development.
- 2.2.4. The Council subsequently prepared an additional Regulation 18 Consultation in 2026. Several options and approaches were refined from those presented at the Issues and Options stage, reflecting substantial changes to national planning policy and the availability of updated evidence. Delivered through a series of consultation exercises between March and June 2026, this stage set out the emerging direction of the new local plan. It presented an updated vision and strategic objectives, alongside revised figures and options for housing and employment growth with corresponding delivery mechanisms. It also introduced a suite of draft policy

directions indicating the proposed direction of travel for each policy area, together with a number of residential and employment site options under consideration for allocation.

- 2.2.5. Tamworth Borough Council has now prepared the Pre-Submission Local Plan (Regulation 19), which forms the basis of this Sustainability Appraisal Report. In line with the LDS, consultation on the Regulation 19 Plan will be followed by submission (Regulation 22) in December 2026, with adoption anticipated by April 2028 at the latest.

2.3. Pre-Submission Local Plan (Regulation 19)

- 2.3.1. The Regulation 19 Pre-Submission Local Plan is the final draft stage of the TBLP. It sets out:

- Vision and strategic objectives;
- A spatial strategy for Tamworth;
- A series of planning policies to guide development in the borough to 2043; and
- Site allocations and policies for housing and employment uses.

- 2.3.2. Each plan component is discussed in turn below.

Vision and Strategic Objectives

- 2.3.3. The vision for the borough to 2043 is set out in Table 2.1, as follows:

Table 2.1: Pre-Submission Local Plan Vision

The Vision for Tamworth in 2043
In 2043 Tamworth will be a place where people can stay and grow with jobs and amenities to meet their needs. The town will have grown in a sustainable way that balances economic, social, and environmental needs. New house building will have created more affordable, well-designed and locally distinctive homes in the right locations to meet the needs of the whole community both now, and into the future. These homes will be adaptable to accommodate the changing ways people use them over their lifetime, including into old age. The borough will be an attractive location for new business investment to help diversify Tamworth's economy, whilst also supporting existing local businesses to stay and grow. Opportunities will also have been taken where possible to support the education sector in increasing educational attainment levels for residents. A vibrant, regenerated town centre will have a mix of retail, leisure, and other uses (including residential) to ensure its long-term vitality and

viability whilst also being flexible enough to adapt to the changing needs of residents, businesses, and visitors. The town's tourist attractions will have been protected and enhanced.

The town's heritage assets are key to its unique identity and sense of place, and a tangible reminder of its rich and significant past. These assets and other tourist attractions will have been protected and, where possible, enhanced for future generations.

Tamworth will have adapted to and mitigated as far as possible the effects of climate change through encouraging sustainably located, climate resilient development for both new buildings and the modification of existing buildings, and by working with partners to reduce the risk and impact of flooding.

A balance between growth and the protection of the natural environment will have been achieved with opportunities taken to improve biodiversity and aid in nature's recovery. Access to good quality open space, blue, and green infrastructure will also have been maintained and, where appropriate, improved. This, coupled with opportunities for formal and informal leisure activities and opportunities for sustainable travel will allow residents to live more active, healthier lives.

All new development within Tamworth will be well designed and complement the distinctive local character of its immediate surroundings. Through working with partners, all new development will also be supported by appropriate infrastructure including appropriate digital infrastructure.

Healthy, sustainable, safe, and inclusive communities will foster community cohesion a sense of civic pride, and provide residents with easy access to local facilities such as shops and services, open spaces, and community facilities, to meet every day needs.

The need to travel by private vehicle will be reduced, as opportunities will exist to encourage more active travel (such as walking and cycling) that makes the most of Tamworth's compact size. Through working with partners, improved public transport links will exist to the town centre, employment areas, and train and bus links to destinations outside of Tamworth.

2.3.4. The vision is supported by 12 strategic objectives, as set out in Table 2.2 below.

Table 2.2: Pre-Submission Local Plan Strategic Objectives

Strategic Objectives for Pre-Submission Local Plan
LPO1: Make the most efficient and sustainable use of the Borough's limited supply of land.
LPO2: Provide a supply of high quality and affordable homes to meet the diverse needs of our community.
LPO3: Support the existing local economy whilst being flexible enough to respond positively to new economic opportunities.

LPO4: Regenerate and diversify the town centre to create a thriving destination and vibrant evening economy.
LPO5: Protect and enhance the borough's heritage including through facilitating appropriate and sustainable reuse of heritage assets.
LPO6: Tackle the causes and adapt to the effects of climate change.
LPO7: Protect and enhance ecological and biodiversity assets.
LPO8: Deliver sustainable neighbourhoods through the provision, protection, and enhancement of local services and facilities.
LPO9: Foster a more inclusive and connected community where individuals from all backgrounds feel valued, heard and supported.
LPO10: Encourage active and healthier lifestyles including by providing accessible and better connected green and blue linkages and open spaces, as well as formal indoor and outdoor recreation facilities.
LPO11: Promote sustainable transport modes for all journeys through improving walking, cycling, public transport and electric vehicle facilities.
LPO12: Ensure that appropriate infrastructure is in place to support development across the Borough including digital infrastructure.

Development Requirements and Spatial Strategy

2.3.5. The Pre-Submission Local Plan sets out the following development requirements for the period 2022-2043:

- Housing: To deliver a minimum of 3,945 new homes over the plan period.
- Employment: To provide a minimum of 39,200 sqm of new employment floorspace.
- Retail: A minimum of 2,700sqm of new comparison retail floorspace.

2.3.6. The overall spatial strategy is summarised as follows:

- Growth is focused within Tamworth's compact urban area, reflecting significant land constraints and the need to use land efficiently.
- Development on allocated sites will be maximised to ensure land is used effectively and sustainably.
- Limited Green Belt release will contribute to meeting part of the housing requirement.
- Modest-scale brownfield redevelopment will continue where it can be delivered sustainably.
- The town centre will be the main focus for regeneration and new town centre uses.
- A targeted place-based approach will focus intervention in the borough's most affected neighbourhoods.

- Employment growth will be directed to the allocated employment site and existing employment areas.
- Part of Tamworth's unmet housing need will be addressed through ongoing cross-boundary work within the wider Housing Market Area.
- Growth will be located where existing or planned infrastructure capacity can support long-term sustainability.

Local Plan Policies

- 2.3.7. To support the overall strategy for development, the Pre-Submission Local Plan sets out a range of policies to help guide new development across the borough.
- 2.3.8. The policies included in the Regulation 19 Pre-Submission Local Plan are listed in Table 2.3, arranged by overarching theme.

Table 2.3: Local Plan Policies by Theme

Local Plan Policies by Theme	
Strategic Policy SP1: A Spatial Strategy for Tamworth	
Strategic Policy SP2: Climate Change	
Strategic Policy SP3: Protecting and Enhancing the Green Belt	
Housing	
Strategic Policy SP4: Housing Allocations	
Policy HO1: Housing Mix	
Policy HO2: Housing Density	
Policy HO3: Affordable Housing	
Policy HO4: Older Persons and Other Specialist Forms of Accommodation	
Policy HO5: Gypsies and Travellers, and Travelling Showpeople	
Economy and Employment	
Strategic Policy SP5: Employment Allocation	
Policy EM1: Existing Employment Areas	
Policy EM2: Employment Uses Outside of Existing Employment Areas	
Policy EM3: Non-Employment Uses in Employment Areas	
Policy EM4: Strengthening the Visitor Economy	
Town Centre and Retail	
Strategic Policy SP6: Retail, Centres and Regeneration	
Policy TC1: The Hierarchy of Centres	
Policy TC2: Development in the Town Centre	
Policy TC3: Gungate Regeneration Opportunity	

Local Plan Policies by Theme
Policy TC4: Ankerside Regeneration Opportunity
Policy TC5: Main Town Centre Uses Outside Centres
Policy TC6: Development in Neighbourhood Centres
Healthy Communities
Policy HC1: Development Affecting Existing Community Facilities and Public Service Infrastructure
Policy HC2: Community Facilities, Public Service Infrastructure and New Development
Policy HC3: New and Improved Community Facilities and Public Service Infrastructure
Policy HC4: Glascote Heath and Stonydelph (Pride in Place)
Policy HC5: Existing Open Space, Sport, Leisure and Recreation Facilities
Policy HC6: Open Space, Sport, Leisure and Recreation Provision in New Development
Policy HC7: New and Improved Open Space, Sport, Leisure and Recreation Provision
Policy HC8: Tamworth Leisure Quarter
Policy HC9: Public Realm
Policy HC10: Safeguarding Burial Space
Policy HC11: Hot Food Takeaways
Heritage
Strategic Policy SP7: Securing the Conservation and Enhancement of Heritage Assets
Policy HE1: Proposals Affecting Designated Heritage Assets
Policy HE2: Proposals Affecting Non-Designated Heritage Assets
Policy HE3: Conservation Areas
Design, Placemaking and the Built Environment
Strategic Policy SP8: Design, Placemaking and the Built Environment
Policy DE1: Delivering High-Quality Design and Respecting Local Distinctiveness
Policy DE2: Masterplanning and Design Codes
Policy DE3: Design Standards for New Housing (including conversions and subdivision)
Policy DE4: Residential Infill / Backland Development
Policy DE5: Existing Buildings – Extensions and Alterations
Policy DE6: Non-Residential and Employment Development
Policy DE7: Shopfront Design and Security
Policy DE8: Advertisements, Signs and Illumination

Local Plan Policies by Theme
Flooding
Policy FL1: The Sequential Test and Exception Test
Policy FL2: Ensuring Development is Safe from Flooding
Policy FL3: Sustainable Drainage Systems, Watercourses and Water Quality
Policy FL4: Flood Mitigation Infrastructure
Protecting the Natural Environment
Policy NE1: Blue and Green Infrastructure Requirements
Policy NE2: National and Local Sites of Importance for Biodiversity
Policy NE3: Geodiversity
Policy NE4: Biodiversity Net Gain
Policy NE5: No Net Loss for Development Not Subject to Mandatory BNG
Policy NE6: Trees
Environmental Protection and Amenity
Policy EP1: Safeguarding Amenity and Managing the Impacts of Development
Policy EP2: Pollution, Ground Conditions and Contamination
Policy EP3: Safeguarding Minerals and Soils
Sustainable Transport and Active Travel
Strategic Policy SP9: Sustainable Transport and Active Travel
Policy TA1: Managing Car Use
Policy TA2: Impact on the Transport Network and Highways Safety
Policy TA3: Freight, Servicing and Logistics
Infrastructure and Obligations
Policy IO1: Infrastructure Delivery
Policy IO2: Development Contributions

Proposed Allocations

- 2.3.9. At this stage, the Pre-Submission Local Plan proposes development of 18 housing sites and one employment site across the borough.

Chapter 3: Scoping Information and Key Sustainability Issues

3.1. Introduction

- 3.1.1. For completion of Stage A of the Sustainability Appraisal, a Scoping Report was prepared and consulted on by SLR Consulting Ltd. It set out the local planning and SA processes, described the environmental and sustainability context through a review of relevant plans, policies and programmes (PPP) and baseline information, presented the SA Framework, and outlined the approach to the appraisal.
- 3.1.2. As part of preparing this Regulation 19 SA, the information set out at the Scoping stage has been reviewed. Given the short interval between the Scoping Report and this appraisal, and the absence of substantive changes in the evidence base, both the PPP and baseline information remain up to date. They are reproduced in full in Appendix C and form the basis for this appraisal.

3.2. Review of Plans, Policies and Programmes

- 3.2.1. As required by the SEA Directive, the SA must identify and consider other plans, policies and programmes that shape the wider environmental and sustainability objectives relevant to the local plan.
- 3.2.2. The review of PPPs identifies the key objectives, policy aims and requirements relevant to the plan area, highlights the wider sustainability considerations that may influence the local plan and the SA, and draws out the relationships, opportunities and potential tensions between these documents and the emerging plan. It also contributes to the identification of baseline information and key sustainability issues.
- 3.2.3. A full review of relevant PPPs was undertaken by SLR Consulting Ltd as part of the Scoping stage. The full PPP review is presented in Appendix C.
- 3.2.4. The key messages from the PPP review are summarised by thematic area in Table 3.1.

Table 3.1: Key Messages from the PPP

SA Topic	Key Messages from PPP
Economy and Employment	- Planning policies should set criteria for, or identify strategic sites for, local and inward investment and address barriers to investment. - Planning policies should be flexible enough to accommodate needs not anticipated in the plan, including new working practices. - Support economic growth and productivity across Tamworth, particularly in Lower Gungate. - Encourage long-term investment in infrastructure, skills and knowledge.

SA Topic	Key Messages from PPP
	- Promote a dynamic economy that encourages innovation and diversification. - Encourage the use of previously developed land. - Create jobs and support wider economic prosperity. - Secure investment to deliver world-class infrastructure and connectivity - Provide a balanced mix of town centre uses across the borough. - Regenerate Tamworth town centre and transform it into a vibrant centre. - Boost the visitor economy, including tourism and the evening and night-time economy.
Population and Equalities	- Ensure fair and equal access to services and support irrespective of race religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership, socio-economic status or pregnancy/maternity. - Provide opportunities for members of the community to mix and meet. - Ensure an integrated approach to housing, community facilities and services. - Improve social mobility and reduce social exclusion. - Tackle poverty and inequality. - Reduce crime and help residents feel safe.
Health	- Planning policies should aim to achieve healthy, inclusive and safe places. - Improve accessibility to health services. - Improve public health and wellbeing by providing effective support for mental and physical health issues. - Connect people with nature. - Deliver high quality open spaces that meet the needs of local residents and are accessible to all. - Promote healthier lifestyles and reduce obesity. - Increase the proportion of people regularly exercising by prioritising active travel in the design of new development. - Support all residents to live independently.
Housing	- Meet future housing need. The NPPF requires local authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. - Ensure that housing growth requirements are accommodated in the most sustainable way.

SA Topic	Key Messages from PPP
	• Enable housing growth and deliver a mix of high-quality housing of varying size and tenure in order to meet local family housing needs. • Ensure there is an adequate number of affordable housing. • Reduce the number of empty homes. • Provide a mix of housing that will be attractive to older people and those with care needs, including new mixed tenure 'care ready' age designated housing. • Ensure there is an adequate supply of adapted households, specifically wheelchair user dwellings. • Reduce homelessness.
Transport and Accessibility	• Make the fullest possible use of public transport and active travel (walking and cycling); make cycling and walking a natural choice for shorter journeys. • Encourage sustainable transport and reduce the need to travel • Create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles. • Contribute to tackling climate change by developing and promoting low carbon travel choices. • Support the move to low emission vehicles. • Have an integrated, well managed and inclusive rights of way and access network. • Local planning authorities should support the expansion of electronic vehicle networks.
Air, Noise & Light	• Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum. • Reduce air pollution contributions by developing and promoting low-carbon travel choices. • Minimise pollution and other adverse effects on the local and natural environment. • Limit the impact of light pollution from artificial light, and noise pollution from development, on local amenity and nature conservation.
Climatic Factors	• Continue to cut greenhouse gas emissions in order to mitigate the climate emergency declared by Tamworth Borough Council. • Promote low carbon economies and adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act; achieve a 100% reduction by 2050. • Increase resilience to climate change impact through the location, mix and design of development. • Reduce the need to travel and provide sustainable transport to help mitigate climate change by reducing emissions. • Support energy efficiency and other sustainability improvements (such as the re-use of buildings) in order to improve the resilience of homes and buildings to climate change.

SA Topic	Key Messages from PPP
	• Encourage the provision of renewable energy. • Include natural flood management (e.g. Sustainable Urban Drainage Systems) where possible to provide additional benefits to residents (such as biodiversity enhancement) compared to traditional hard engineered flood solutions. • Avoid development in areas of flood risk. • Improve flood awareness and emergency planning. • Support adaptive water resource management to respond to climate change and increasing demand. • Maximise the potential of Green Infrastructure in providing climate change mitigation.
Biodiversity, Geodiversity, Flora and Fauna	• Identify, protect and enhance biodiversity and ecological corridors, including international, national and local designated sites (statutory and non-statutory), protected and priority species, habitats and wildlife networks. • Minimise impacts on biodiversity and provide net gains in biodiversity in line with NPPF and the Environment Act 2021. • Recognise the wider benefits of ecosystem services. • Biodiversity creation and enhancement in and around development should be designed at the landscape level and led by local understanding. • Maintain and restore priority habitats, including lowland wood-pasture and parkland, heathlands, wetlands, woodlands, rivers, and species-rich farmland, to ensure future resilience. • Create buffer zones around high-quality habitats. • Maximise the potential of Green Infrastructure within urban and rural areas to reduce the impact of climate change and act as stepping stones within the ecological networks. • Protect and enhance natural greenspace with regards to its cultural and public connection, and its accessibility. • Maintain and enhance geodiversity through the management of sites, areas and wider landscapes. • Increase recognition of our geodiversity in development policies. • Restore and enhance waterbodies to improve biodiversity. • Provide public education on biodiversity and the value of local habitats.
Cultural Heritage	• Conserve and enhance the significance of international, national and local designated and non-designated heritage assets, including locally significant historic buildings and heritage assets and their settings. • Conserve and enhance historic character and local distinctiveness. • Improve the condition of heritage 'at risk' in the Borough. • Maintain and enhance access to cultural heritage assets. • Ensure development in or adjacent to Conservation Areas or Listed buildings (and their settings) respects their

SA Topic	Key Messages from PPP
	character and context and enhances the quality of the built environment. • Preserve and enhance the significance of Conservation Areas in Tamworth Borough. • Ensure that any alterations or repairs to traditional buildings preserve and where possible, improve the character and appearance of the building. • Promote the use of sustainable materials. • Protect the historic environment for the benefit of our own and future generations. • Maximise the economic and social impact of heritage and to ensure that current and future generations can enjoy and benefit from it.
Landscape and Townscape	• Maintain and enhance the overall quality and diversity of landscape character across the Borough. • Seek to promote or reinforce local distinctiveness. • Protect and enhance valued landscapes, biological and geological conservation interests and soils. • Recognise the wider benefits from natural capital and ecosystem services. • Conserve and enhance the natural beauty of landscapes. • Seek to protect Green Belt across the Borough where possible.
Soils, Water and Minerals	• Sustainably manage soils. • Protect soil quality and avoid soil pollution, particularly during construction. • Encourage the use of previously developed (brownfield) land. • Remediate land contamination. • Prevent pollution of groundwater. • Ensure that water quality is improved or maintained where possible. • Ensure national and localised water quality and wastewater targets are met. • Promote the effective delivery of adequate water and wastewater infrastructure. • Improve water efficiency and minimise the amount of water lost through leakage. • Promote sustainable and water efficient development. • Promote the efficient supply and use of minerals.
Waste	• Ensure the design and layout of new development supports sustainable waste management. • Manage waste in line with the waste hierarchy. • Meet national, regional and localised waste targets including those on landfill, reuse and recycling. • Provide protection to the local environment and residents, whilst ensuring the provision of waste management facilities in accordance with Government policy and society's needs.

SA Topic	Key Messages from PPP
	- Encourage and support the Circular Economy where possible. - Promote the use of sustainable materials.

3.3. Baseline Information

- 3.3.1. Baseline information provides the context for assessing the sustainability of proposals in the local plan. It supports the identification of trends, assists in predicting the likely effects of the plan, and provides the basis for monitoring outcomes.
- 3.3.2. Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these factors. As an integrated SA and SEA is being carried out, baseline information relating to wider sustainability topics is also included, such as housing, education, transport, energy, waste and economic growth.
- 3.3.3. The full baseline analysis is presented in Appendix C. The SEA Regulations also require the SA Report to describe the likely evolution of the baseline without implementation of the plan being assessed. This is also addressed in Appendix C.

3.4. Key Sustainability Issues

- 3.4.1. The Scoping Report (2026) identified a number of key sustainability issues affecting Tamworth. Following review of the PPP and baseline evidence as part of preparing this Regulation 19 SA, no changes have been made to these issues at this stage. They are summarised in Table 3.2 and presented in full in Appendix C.

Table 3.2: Key Sustainability Issues

SA Topic	Key Sustainability Issues
Economy and Employment	- Workforce pressures are increasing due to unemployment, a protected decline in the young and working-age residents, and a growing ageing population. - Job density in Tamworth is low, with wage inequalities between men and women and a high proportion of low-skilled, low-wage vacancies. - Skills and qualifications levels are comparatively low, with fewer professional occupations and less than a quarter of the workforce qualified to a Level 4+, indicating reliance on a narrow range of industries. - Business resilience is a concern due to high reliance on micro-businesses and the need to support SMEs to improve survival rates.

SA Topic	Key Sustainability Issues
	• There is a need for more good-quality employment space including start-up units, office space, industrial premises, and large-scale warehousing and manufacturing space. • Most residents commute out of the borough, highlighting the need for more local employment opportunities aligned with local skills to retain the workforce. • Tamworth's town centre requires continued investment to address high vacancy rates, adapt to changing retail patterns, and support regeneration, including at Gungate. • Tourism plays an important role in the local economy and needs continued support to strengthen economic activity. • Employment land supply is constrained, meaning growth is likely to focus on redevelopment of existing sites, supported by the need to maintain good digital connectivity for businesses and remote working.
Population and Equalities	• The borough's population structure is becoming increasingly unbalanced, with a projected decline in young and working-age residents and continued growth in older age groups. • An ageing population will place pressure on health and social care services, supported living, and accessibility standards in housing and public spaces. • Tamworth experiences high levels of deprivation in education, health, and crime, particularly within Glascote Heath and Central Tamworth. • A large proportion of children experience income deprivation, resulting in many falling below the poverty line. • Educational attainment rates in Tamworth is lower than the regional and national average. • Demand for primary school places is high, particularly in the north of the borough. • Demand for SEND support is rising, with a projected shortfall of specialist school places and a need for more inclusive school environments. • Crime rates in Tamworth are increasing, creating a need for well-designed development that reduces opportunities for crime and promotes feelings of safety. • There is a need for inclusive, well-designed development that accommodates a shifting population structure and ensures equal access to services.
Health	• Increased development in Tamworth may place additional pressure on existing NHS infrastructure, particularly GP practices and hospital services. There is a need to keep services accessible for all. • Life expectancy in Tamworth is lower than county and national averages, with significantly poorer outcomes in the most deprived areas. • Adult and child obesity levels are high, contributing to long-term physical, psychological and emotional health issues. • Physical inactivity is widespread among adults and children, indicating a need to promote healthier lifestyles.

SA Topic	Key Sustainability Issues
	• A high proportion of residents identify as disabled, creating a need for accessible housing and inclusive employment opportunities. • Under-18 conception rates are among the highest in England and Wales. • Air pollution from PM2.5 significantly affects health, particularly among vulnerable groups. • Poor mental health is a notable issue, with rates of depression and self-harm above national and county averages. • Dementia prevalence is high, creating a need to improve and expand residential care and nursing provision. • Hospital admissions due to falls among the over-65's are high, highlighting the need for more adaptable and accessible homes and public spaces, alongside wider planning for the ageing population.
Housing	• Tamworth is experiencing modest household growth; • Land constraints mean that the borough has limited land available for housing delivery, and Tamworth will be unable to meet its housing need in full without support from neighbouring authorities. • Limited land availability for major developments means that there will be greater reliance on smaller sites, which may increase pressure on existing infrastructure. • There is a need to meet the full range of housing needs across all tenures, including specific types and tenures and both market and affordable housing. • Improving the design, build quality and sustainability of new housing remains important. • Privately rented housing has increased while ownership and social renting have declined. • The existing housing stock is predominantly semi-detached, and new development provides an opportunity to diversify the stock and meet a wider range of needs. • The supply of larger family-sized homes is limited, contributing to overcrowding, particularly among households with children and multi-generational families. • Housing costs have increased faster than local earnings, making it difficult for individuals to access home ownership. • There is a need to provide more affordable housing that is appropriate to the local housing market and income profile, with reliance on minor development sites limiting opportunities to secure affordable dwellings. • Deprivation and housing stress are concentrated in areas with high levels of social housing. • There will be a need for suitably designed housing to meet demands of an aging population. • There is a demand for self-build and custom-build housing in Tamworth, and opportunities should be supported where land arises and proposals align with planning policy.

SA Topic	Key Sustainability Issues
Transport and Accessibility	• The borough's compact urban nature provides scope to encourage more walking, cycling and public transport use. • Strong dependence on private car use contributes to congestion associated with increased development. • Frequent short journeys by car add to existing congestion issues, particularly in the north of the borough. • Additional development may place further demand on road corridors that already experience constraints. • Improvements are needed to make public transport and active travel more accessible and inclusive. • Safeguarding key rail connections remains important for maintaining sustainable travel choices. • Enhancing the safety, directness and connectivity of cycling routes would support greater uptake. • Current EV charging infrastructure does not yet meet existing or future needs.
Air, Noise and Light	• Air quality issues may exacerbate existing health inequalities within the borough. • Tamworth current meets national air-quality standards and has no AQMAs, but ongoing monitoring is required as future housing and commercial growth could increase traffic and emissions. • There is significant reliance on petrol and diesel-fuelled cars as the main mode of transport within the borough. • Housing growth is likely to increase vehicle movements and this needs to be managed so that additional traffic does not lead to deterioration in local air quality. • Inappropriate siting of new development near major noise sources, including existing or major new roads, has the potential to adversely affect wellbeing. • There is a need to reduce light pollution and restrict further intensification from new development. • Air, noise and light pollution may arise from construction works and new development associated with growth proposed in the local plan.
Climatic Factors	• Fluvial and surface-water flooding present the greatest flooding risks in the Borough. • Residents in Central Tamworth and Glascote Heath are most vulnerable to flooding. • Green Infrastructure offers opportunities to address multiple issues through multifunctional spaces. • New development will need to incorporate sustainable drainage systems to support reduced flood risk. • Low-carbon and renewable energy generation will need to be incorporated into new development to help minimise carbon emissions, with solar currently the main renewable source in the borough. • Domestic and transport emissions from fossil-fuel combustion are the main contributors to CO2 emissions in the borough. • Building resilience to the wider effects of climate change is important, including adaptation to rising temperatures, water

SA Topic	Key Sustainability Issues
	scarcity and extreme weather, and supporting community-level resilience. The effects of climate change are not experienced equally across the borough, with residents in Central Tamworth and Glascote Heath particularly vulnerable to climate-related heat.
Biodiversity, Geodiversity, Fauna and Flora	- A range of statutory and non-statutory nature conservation sites within the borough require protection from development. - Habitat creation and enhancement within new development needs to consider wider landscape, ecological corridors and the resilience of nature in light of climate change. - Most waterbodies in the River Anker catchment achieved 'Poor' ecological status in 2022, and more broadly, water resources need to be protected from damage. - Positive effects on European designated Habitats Sites outside the borough need to be considered. - Favourable management of protected sites and wider nature recovery remains an ongoing need, in line with the emerging Staffordshire LNRS. - Meeting as much of the minimum 10% biodiversity net gain target within the borough as possible remains an important consideration.
Cultural Heritage	- The cumulative impact of development and associated infrastructure is a significant issue for the historic environment and the special character of Tamworth. - Designated and non-designated heritage assets and their settings could be affected by new development, highlighting the need for a good understanding of heritage value and proportionate conservation. - Climate change presents risks to the historic environment, while reuse and repair of historic assets can support mitigation. - Two assets are currently on the heritage at risk register, both of which are in poor condition. - Funding for enhancement and repair of cultural heritage assets needs to be maintained. - Maintaining cultural assets and access to cultural facilities remains an ongoing need. - Sensitive design and appropriate repurposing offer opportunities to enhance the setting of heritage assets or support their preservation. - Heritage-led regeneration provides an opportunity to improve the appearance of the town centre and support tourism.
Landscape and Townscape	- A small proportion of the Borough is protected as Green Belt, and any loss would need to ensure that the remaining area continues to fulfil its intended purpose. - The borough contains three distinct landscape character areas, reflecting diversity in landscape types and sensitivities. - Targeted investment and conservation efforts are being used to improve areas experiencing degradation and underuse.

SA Topic	Key Sustainability Issues
Soils, Water and Minerals	• Tamworth is predominantly urban with small areas of Grade 2 and Grade 3 agricultural land, and limited remaining greenfield land may face increasing pressure over time. • Local soils are predominantly loamy and clayey with high groundwater, which may constrain drainage and agricultural productivity in parts of the borough. • New development can lead to soil compaction and erosion, which may increase surface-water runoff and flood risk. • Disturbance of soils during construction can release stored carbon and reduce the soil's ability to sequester carbon. • Waterbodies in the borough currently achieve moderate or poor ecological status, influenced by factors such as sewage discharge, urban development, industry and quarrying. • There is a need to improve water quality within the River Tame and River Anker catchments. • Population growth may increase demand on already stressed water resources and treatment infrastructure, highlighting the role of SuDS, water-efficient development and watercourse naturalisation in managing future pressures. • Areas of high and medium-high groundwater vulnerability require protection, particularly around the Source Protection Zone to the west of the town. • Existing mineral resource areas may need to be safeguarded to prevent sterilisation.
Waste	• Local Authority Waste Collection relies on a mix of treatment methods. • Recycling rates in Tamworth remain below the national average, suggesting potential to increase household recycling performance. • Household recycling rates have generally declined over recent years, with an improvement in 2023-24. • Household waste arisings are higher than the national average. • New development may need to provide adequate space for waste separation, to better support circular-economy principles. • Repurposing buildings and recycling demolition waste presents an opportunity to support the waste hierarchy and reduce construction-related waste.

Chapter 4: Approach to Sustainability Appraisal

4.1. Introduction

- 4.1.1. This chapter describes the approach to the SA of the Pre-Submission Local Plan. It sets out the appraisal framework (the SA Framework) and how this has been used to appraise the key components of the local plan. It also documents the difficulties encountered during the assessment process, including key uncertainties and assumptions.

4.2. SA Framework

- 4.2.1. The SA Framework comprises sustainability objectives and decision-making considerations to inform the appraisal. Establishing appropriate SA objectives and guide questions is central to appraising the sustainability effects of the emerging TBLP. Broadly, the SA objectives define the long-term aspirations for Tamworth with regard to social, economic and environmental considerations, and it is against these objectives that the performance of the Pre-Submission Local Plan has been appraised.
- 4.2.2. Table 4.1 presents an overview of the SA Framework, including SA objectives, along with the SEA topic(s) to which each of the SA objectives relates to. The full SA Framework, including decision-making considerations for each objective, is presented in Appendix D.

Table 4.1: SA Objectives, including links to relevant SEA Directive Topics

SA Objective	SEA Topic
SAO1: Economy To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Population; material assets
SAO2: Employment To create greater employment opportunities and high value jobs for all across the Borough	Population; material assets
SAO3: Accessibility Improve local accessibility to education, healthcare, employment, community, recreational and cultural facilities	Population; human health; material assets
SAO4: Health and Wellbeing Maintain and improve the mental and physical health and wellbeing of residents.	Human health; population
SAO5: Quality of Life Create safe and attractive places which contribute towards quality of life and community cohesion	Human health; population; landscapes

SA Objective	SEA Topic
SAO6: Housing To deliver a range of housing sites and ensure everyone has access to high quality and affordable housing, which meets the needs of all residents	Population; material assets
SAO7: Sustainable Travel Reduce the need to travel and promote the use of sustainable travel modes including walking, cycling and public transport usage.	Air; climatic; human health; population
SAO8: Air, Light and Noise Pollution Minimise air, light and noise pollution and ensure that future growth does not lead to the deterioration of environmental conditions	Air; human health
SAO9: Soils and Water Pollution Minimise soils and water pollution and ensure that future growth does not lead to the deterioration of environmental conditions	Soil; water
SAO10: Minimising Contributions to Climate Change Reduce emissions that contribute toward climate change and support the achievement of a net zero carbon Borough	Climatic; air
SAO11: Climate Adaptation Adapt to the effects of climate change including extreme weather and overheating and strengthen climate change	Climatic; water; human health
SAO12: Flood Risk Minimise current and future flood risk	Water; climatic
SAO13: Biodiversity Safeguard and enhance biodiversity and geodiversity and improve connectivity between functional habitats	Biodiversity; fauna; flora
SAO14: Historic Environment Conserve and enhance the significance of heritage and archaeological assets and their settings	Cultural heritage
SAO15: Landscape and Townscape Protect and enhance local distinctiveness and landscape and townscape quality	Landscapes
SAO16: Land Resources Ensure the efficient use of land and mineral resources	Soil; material assets
SAO17: Waste Minimise the generation of waste and effectively manage waste that is created in line with the Circular Economy	Material assets; human health; soil; water

4.2.3. Table 4.2 shows the extent to which the SA objectives encompass the range of issues identified in the SEA Directive.

Table 4.2: Representation of SEA Directive Topics in SA Objectives

SEA Directive Topic	SA Objective(s)
Biodiversity	SAO13
Population	SAO1, SAO2, SAO3, SAO4, SAO5, SAO6, SAO7
Human Health	SAO3, SAO4, SAO5, SAO7, SAO8, SAO11, SAO17
Fauna	SAO13
Flora	SAO13
Soil	SAO9, SAO16, SAO17
Water	SAO9, SAO11, SAO12, SAO17
Air	SAO7, SAO8, SAO10,
Climatic Factors	SAO7, SAO10, SAO11, SAO12
Material Assets	SAO1, SAO2, SAO3, SAO6, SAO16, SAO17
Cultural Heritage including architectural and archaeological heritage	SAO14
Landscape	SAO5, SAO15

4.3. Methodology

4.3.1. The SA has appraised the following components of the Pre-Submission Local Plan:

- Vision and objectives
- Options for quantum of development, including the preferred approach
- Options for distribution of development, including the preferred approach
- Development site allocations
- Policies

4.3.2. The approach to the appraisal of each of the elements above is set out in the sections below.

Appraisal of Vision and Objectives

4.3.3. A vision and supporting objectives have been developed to underpin the local plan. The SA considers whether these components promote sustainable development in Tamworth and align with the SA Framework.

4.3.4. The vision and strategic objectives have been appraised against each of the 17 SA Objectives using a structured matrix. Each matrix records:

- The SA Objectives;
- A qualitative score;

- Commentary on likely significant effects, assumptions and uncertainties; and
- Recommendations for mitigation or enhancement if applicable.

- 4.3.5. A qualitative scoring system has been applied, as set out in Table 4.3. A broader scoring range is used for the objectives because they are inherently high-level and conceptual in nature. It is therefore not meaningful to distinguish between minor and major effects in the same way as for more detailed options or policies.
- 4.3.6. The completed appraisal matrices, together with supporting commentary, are set out in Chapter 6 of this report.

Table 4.3: Scoring System to Appraise the Likely Effects of Vision and Objectives

Score	Description
+	Broadly Compatible Pursuing the local plan objective is likely to help to achieve the sustainability objective
-	Potential Conflict Pursuing the local plan objective may work against or prevent the sustainability objective being achieved
0	No Clear Link The local plan objective is unlikely to have any direct influence on the sustainability objective
?	Uncertain Pursuing the local plan objective may have mixed implications for the sustainability objective, depending on how the local plan objective is pursued

Appraisal of Reasonable Alternatives for Quantum and Distribution

- 4.3.7. Chapter 5 sets out the reasonable alternatives considered for the quantum and distribution of development in Tamworth, including reasons for selecting the preferred approach.
- 4.3.8. Where relevant, these have been appraised against the 17 SA Objectives using a comparative matrix. For each approach, the matrix records the SA objective and a qualitative score. The matrix is supported by accompanying commentary on the likely significant effects, assumptions, uncertainties and potential mitigation.
- 4.3.9. The scoring system in Table 4.4 has been applied. The completed appraisal matrices and supporting commentary are presented in Chapter 5 of this report.

Table 4.4: Scoring System to Appraise the Likely Effects of Quantum and Distribution

Score	Degree of Effect	Description
++	Major positive effects	The proposed approach or policy contributes significantly to the achievement of the sustainability objective.

+	Minor positive effects	The proposed approach or policy contributes to the achievement of the sustainability objective but not significantly.
0	Neutral or negligible effects	There are negligible or no effects upon the sustainability objective being appraised. This may include the continuation of a current trend.
-	Minor negative effects	The proposed approach or policy detracts from the achievement of the sustainability objective but not significantly
--	Major negative effects	The proposed approach or policy detracts significantly from the achievement of the sustainability objective.
/	Mixed effects	The effect is likely to be a combination or mixture of positive and negative effects.
?	Uncertain effects	The effect is not known or is too unpredictable to assign a conclusive score. This may be due to a lack of data, or that effects will not be known until more detailed information is provided.

Appraisal of Development Sites

- 4.3.10. The Pre-Submission Local Plan proposes the allocation of a range of sites for residential and employment uses.
- 4.3.11. All proposed allocations have been appraised using tailored appraisal criteria and thresholds of significance. These are set out in Appendix G.
- 4.3.12. Each site has a detailed appraisal matrix that includes:
- The SA Objectives;
 - A qualitative score;
 - Commentary on likely significant effects, assumptions and uncertainties; and
 - Recommendations for mitigation or enhancement.
- 4.3.13. The completed site appraisal matrices are contained in Appendix G. A summary of findings is presented in Chapter 6.

Appraisal of Policies

- 4.3.14. The proposed policies of the Pre-Submission Local Plan have been appraised using the scoring approach set out in Table 4.4.
- 4.3.15. The policies have been appraised against each of the 17 SA Objectives using a structured matrix. Each matrix records:
- The SA Objectives;
 - A qualitative score;
 - Commentary on likely significant effects, assumptions and uncertainties;
 - Commentary on temporal and permanence of likely effects, as well as geographic extent; and

- Recommendations for mitigation or enhancement.

- 4.3.16. The SA also assesses the cumulative effects of the Pre-Submission Local Plan. Cumulative effects have been appraised using the same scoring approach applied to the individual policies set out in Table 4.4.
- 4.3.17. A summary of the appraisal findings is provided in Chapter 6. The detailed appraisal matrices for each policy are contained in Appendix F.

4.4. Difficulties Encountered in Undertaking the Assessment

- 4.4.1. A number of difficulties and limitations arose in the course of the SA as follows:
- There was a need to appraise a reasonable number of site options in a consistent manner. This was addressed through the preparation and application of a clear set of assessment criteria linked directly to each SA objective.
 - The site assessment criteria presented in Appendix G include a number of distance-based criteria used to estimate likely effects of site options. Distances in the appraisal were measured as a straight-line distance from the edge of the site option to the features in question, with it not possible at this stage to indicate the access points of services and facilities or the likely entry and exit points from the site options. In addition, straight line distances do not allow for the consideration of physical barriers that may restrict access to features. However, where possible the availability of crossings and bridges is taken into consideration to ensure that the features are accessible. Therefore, actual walking distances could be greater. To recognise the potential for walking distances to be greater, when applying the Institute of Highways and Transportation distances for the appraisal of site options to each of the relevant distances. A 10% buffer was applied to account for the potential difference between the straight-line distance and the actual distance involved in a journey.
 - Similarly, straight line distances were used to define areas within which varying levels of harm to environmental receptors were assumed to exist. In reality, the risk of harmful effects will sometimes depend on non-linear pathways and will depend on the particular vulnerabilities of specific receptors.
 - There is limited up to date information on landscape sensitivities in respect of the appraisal on SAO15 (Landscape and Townscape). A Landscape Character Assessment is currently underway, which will provide a more robust evidence base for future stages of SA.
 - Cycle route information was used to inform the appraisal of SAO7 (Sustainable Travel), although the supporting GIS dataset is currently being updated.
 - Whilst the appraisal of SAO12 is informed by the Level 2 SFRA, many matters cannot be determined until the planning application stage.
 - The available GIS data for agricultural land classification does not distinguish between Grade 3a and 3b. This introduces some uncertainty when assessing likely effects, as set out in the assumptions in Appendix G.

- 4.4.2. Further assumptions and uncertainties have been identified throughout the appraisal and are primarily set out in the individual policy and site assessments in Appendices F and G, and where relevant, the narratives provided in Chapters 5 and 6.
- 4.4.3. More generally, across the policy and site assessments, a number of assumptions and uncertainties relate to matters that will only be resolved at the planning application stage, including detailed design, layout, site-specific mitigation and the precise nature, scale and operation of development.

Chapter 5: Assessment of Reasonable Alternatives

5.1. Introduction

- 5.1.1. Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that reasonable alternatives, taking into account the objectives and geographical scope of the plan, are identified, described and evaluated, and that the reasons for selecting the alternatives are given. The SA Report must also explain why the preferred approach is considered the most appropriate strategy when judged against those alternatives.
- 5.1.2. In addressing this requirement, this chapter records alternatives identified at each stage of plan preparation, summarises the appraisal already undertaken and reported through the Interim SA Report (June 2026), sets out the reasons why alternatives have been refined or discounted as the evidence base and national policy have evolved, and provides the reasoned justification for the approach now embodied in Strategic Policy SP1 (A Spatial Strategy for Tamworth) and its supporting policies.
- 5.1.3. Reasonable alternatives have been considered for the following elements of the TBLP:
- the overall quantum of housing growth;
 - the distribution and delivery of housing growth;
 - the overall quantum of employment growth;
 - the distribution and delivery of employment growth;
 - the location of retail and town centre growth; and
 - the identification of reasonable alternative development sites.
- 5.1.4. Alternatives for the scale and distribution of growth have been identified at the strategic level, as combinations of quantum and delivery mechanism, rather than at the level of individual site options. This reflects the fundamental characteristic of the Borough that shapes the whole of this chapter, that Tamworth is a compact, predominantly urban authority of approximately 12 square miles with tightly defined administrative boundaries, whose built-up area extends across the majority of the Borough and in many locations reaches the boundary itself. Remaining undeveloped land is limited and the most extensive areas are generally of high functional or landscape value and subject to physical, environmental or policy constraints. Reasonable alternatives at the level of individual sites, including the specific Green Belt parcels proposed for release, are addressed at section 5.5 and through the site-specific appraisals presented in Chapter 6 and Appendix G.
- 5.1.5. Reasonable alternatives were identified at the Issues and Options consultation (September 2022), the Advanced Regulation 18 consultation (June 2026) and the

Regulation 19 Pre-Submission stage (August 2026). Those identified at the Advanced Regulation 18 stage were appraised in the Interim SA Report (June 2026); those identified at Regulation 19 are appraised in this report. The evolution of alternatives across the three stages is summarised in Table 5.1.

Table 5.1: Evolution of Reasonable Alternatives Through Plan Preparation

Plan Element	Issues and Options (Sept 2022)	Advanced Regulation 18 (June 2026)	Regulation 19 (Aug 2026)
Housing growth	Options A and B identified. No formal SA; proportionate internal sustainability review.	Options A and B discounted following the revised standard method. Options C and D identified and appraised in the Interim SA.	Option D discounted. Option C carried forward as the only remaining reasonable alternative (8,608 homes).
Housing distribution	Four broad distribution options (A to D) identified. Not formally appraised.	No discrete spatial alternatives identified. Five delivery mechanisms (i to v) appraised in principle, without matrices.	Two developed alternatives identified and appraised through matrices. Alternative 2 preferred.
Employment growth	Option A identified (2019 HEDNA). No formal SA.	Option A discounted. Options B and C identified and appraised in the Interim SA.	Option C discounted. Option B carried forward, refined to a net requirement of 21.8 ha.
Employment distribution	Four distribution options (A to D) identified. Not formally appraised.	Options A to D set aside as no longer reasonable. Two delivery mechanisms (i and ii) appraised in principle.	Three developed alternatives identified and appraised through matrices. Alternative 2 preferred.
Retail	No options identified.	No options identified.	No reasonable alternatives for the quantum. Location tested through the sequential approach.
Development sites	No sites identified.	33 reasonable alternative sites identified and appraised in the Interim SA 30 housing 1 employment 2 mixed-use regeneration	19 reasonable alternative sites carried forward following updated deliverability evidence 18 housing 1 employment (2 mixed-use regeneration sites assessed in Policy Assessments)

- 5.1.6. Two points of principle apply throughout this chapter. First, an alternative is only 'reasonable' for the purposes of the SEA Regulations where it is realistic and deliverable and would achieve the objectives of the plan. Alternatives that have been overtaken by national policy or by updated evidence are not carried forward, and the reasons for their discounting are recorded here so that the audit trail of decision-making is complete. Second, where the Borough's land supply rather than the choice between options is the operative constraint on what can be delivered, this is stated explicitly because it materially affects how the appraisal findings should be read.

- 5.1.7. The sections that follow summarise the position reached at each earlier stage. The full appraisal of the alternatives identified at the Advanced Regulation 18 stage, including the assessment matrices and detailed commentary is set out in Chapter 4 of the Interim SA Report (June 2026) and is not repeated here. The substantive appraisal in this chapter is of the alternatives identified at Regulation 19.

5.2. Housing

Housing Growth Options

- 5.2.1. The Council has identified and assessed reasonable alternatives for the overall level of housing growth at successive stages of plan-making. As national policy and the evidence base have evolved, earlier alternatives have been refined or discounted where they no longer meet the SEA reasonableness test. Four alternatives have been identified in total across plan preparation; updated evidence confirms that only one remains reasonable at Regulation 19.

Alternatives Identified at the Issues and Options Stage (September 2022)

- 5.2.2. Paragraph 62 of the NPPF states that the minimum number of homes needed in an area should be informed by a local housing need assessment conducted using the standard method set out in Planning Practice Guidance. At the Issues and Options stage the Council identified two exploratory alternatives for the quantum of housing growth, set out in Box 5.1.

Box 5.1: Housing Growth Alternatives Identified at the Issues and Options Stage	
Housing Growth Option A	The standard method calculation applicable at the Issues and Options stage – 141 dwellings per annum (a total of 2,961 homes across the TBLP period).
Housing Growth Option B	A higher, unspecified figure intended to exceed the standard method requirement set out in Housing Growth Option A.

- 5.2.3. These options reflected the evidence base and national policy requirements available at that time and provided a proportionate basis for early consultation on the scale of growth the new local plan might need to accommodate. They were not subject to formal Sustainability Appraisal but were reviewed through a proportionate internal sustainability exercise, as outlined in Chapter 1. Option B was deliberately unquantified, as it tested the principle of planning above the then standard method figure rather than any specific level of provision, and could not therefore have been appraised as a discrete alternative against the SA Framework at that stage.

Alternatives Identified at the Advanced Regulation 18 Stage (June 2026)

- 5.2.4. As part of the Government's reforms to the NPPF in December 2024, a revised standard method for calculating housing need was introduced. This resulted in a substantially higher requirement for Tamworth, generating a need for 445 dwellings per annum (equating to 9,345 dwellings over the plan period) and representing a 261% uplift on the previous requirement.
- 5.2.5. In that context, Housing Growth Options A and B were no longer considered reasonable alternatives and were discounted. Option A applied a standard method

calculation that no longer exists and would have planned for less than a third of assessed need. Option B, defined only as a figure exceeding 141 dwellings per annum, had no meaning once the assessed need had risen to 445 dwellings per annum, and the HEDNA subsequently concluded that there is no reasonable justification for Tamworth to plan for a level of growth above the revised standard method requirement.

- 5.2.6. Two new alternatives were identified in their place. The revised standard method figure was adjusted to reflect its introduction part-way through the plan period, on the basis that it was not reasonable to apply it retrospectively to the earlier years, as this would not reflect the delivery expectations in place at the time and would artificially create a deficit at the point of adoption.
- 5.2.7. The Council therefore applied the adopted TBLP annual target of 177 dwellings for the period April 2022 to December 2024, followed by the revised standard method requirement from January 2025 onwards, producing Housing Growth Option C. Given Tamworth's constrained geography and limited land supply, it was also considered appropriate to explore the implications of a lower level of growth drawn from the local housing need figure in the HEDNA, producing Housing Growth Option D. Both are set out in Box 5.2.

Box 5.2: Housing Growth Alternatives Identified at the Advanced Regulation 18 Stage

Housing Growth Option C	A hybrid figure combining the current local plan housing target with the 2025 revised standard method figure – 177 dwellings per annum (April 2022 to December 2024) followed by 445 dwellings per annum (January 2025 onwards), giving a total of 8,608 homes across the TBLP period.
Housing Growth Option D	The local housing need figure derived from the HEDNA – 216 dwellings per annum, giving a total of 4,536 homes across the TBLP period.

Summary of the Interim SA Findings

- 5.2.8. Options C and D were appraised against the full SA Framework in the Interim SA Report (June 2026), where the assessment matrix and supporting commentary are set out in full. In summary, the Interim SA found that both options represent substantial levels of development for a small, tightly constrained and predominantly urban Borough, and that each would give rise to a broad range of effects which scale with the amount of growth proposed. The direction of effect was the same under both options, the distinction between them was one of degree.
- 5.2.9. Both options were found to make a positive contribution to housing delivery, affordability and mix, and to support the viability of local services through a larger population. Against these benefits, both would give rise to negative effects across the environmental objectives, including the permanent loss of greenfield and open land, pressure on biodiversity and on heritage assets and their settings, increased surface water run-off and flood risk from reduced permeability, and additional pressure on the transport network and on infrastructure capacity. Because Option C involves a materially greater quantum of growth, it was scored major negative across

the majority of the environmental objectives where Option D was scored minor negative.

- 5.2.10. The Interim SA concluded that, if delivered in full within the Borough, Option C would perform considerably worse than Option D. It recognised, however, that Tamworth's limited and highly constrained land supply is likely to be the determining factor in what can realistically be accommodated, that the quantum deliverable within the Borough would therefore be similar under both options, and that the effects experienced within the Borough would in practice be broadly comparable. The key difference between the options was identified as the scale of unmet need that would fall to be accommodated elsewhere, the effects of which are not capable of being assessed within this appraisal.
- 5.2.11. The Interim SA also recorded that further capacity work was underway and that the level of development which could realistically and sustainably be accommodated in Tamworth was likely to fall below both Option C and Option D. That work has since been completed and its findings are reported below.

Reasonable Alternatives at the Regulation 19 Stage

- 5.2.12. The 2025 HEDNA found no robust evidence to justify planning for a level of growth below the standard method figure. National policy is clear that the standard method establishes a minimum starting point from which a lower figure can only be justified in limited and evidenced circumstances that do not apply in Tamworth's case. Planning for 4,536 homes against an assessed need of 8,608 would not constitute a positively prepared or justified strategy for the purposes of paragraph 36 of the NPPF (2024), and an alternative which could not be found sound at examination is not a realistic alternative for the purposes of the SEA Regulations. Housing Growth Option D has not, therefore, been carried forward as a reasonable alternative at Regulation 19.
- 5.2.13. The Regulation 19 Pre-Submission Local Plan proceeds on the basis of Housing Growth Option C, which establishes a total requirement of 8,608 homes over the plan period 2022 to 2043, as set out in Strategic Policy SP1(3). Option C is the only remaining reasonable alternative for the overall quantum of housing growth.
- 5.2.14. The Interim SA recorded that Housing Growth Option C would perform considerably worse than Housing Growth Option D if required to be met in full within the Borough, but also recognised that Tamworth's very limited land supply, rather than the requirement figure itself, would be the determining factor in what could actually be delivered locally. The completed capacity and deliverability work confirms that this is the case. Less than half of the 8,608 homes required can be accommodated within the Borough, and the balance must be addressed through the Duty to Cooperate.
- 5.2.15. This has a material bearing on how the Interim SA findings for Option C should be read at Regulation 19. The major negative effects identified were predicated on the full 8,608 homes being delivered within the Borough. The effects that will in fact be experienced within Tamworth are those associated with the deliverable quantum of 3,945 homes identified in Table 5.3, and it is that quantum and its distribution which the Regulation 19 appraisal is concerned with. The effects associated with the residual requirement fall to be considered by the authorities in which that growth is ultimately accommodated.

- 5.2.16. The reasonable alternatives at Regulation 19 therefore concern how the deliverable proportion of the requirement should be distributed within the Borough, rather than whether a lower overall requirement figure should be adopted.

Housing Distribution

Summary of the Position to the End of the Advanced Regulation 18 Stage

- 5.2.17. At the Issues and Options stage (2022), four broad approaches to delivering housing growth were identified alongside the housing growth options presented in the same consultation:
- making best use of previously developed land before allocating greenfield land (Option A)
 - increasing density for new development, especially in sustainable locations (Option B)
 - seeking support from neighbouring authorities to deliver any unmet need (Option C), and
 - releasing Green Belt land as a last resort (Option D)
- 5.2.18. By the Advanced Regulation 18 stage the context had changed significantly as a result of the substantially increased housing requirement. The Interim SA revisited these approaches in more general terms and introduced an additional mechanism, reflecting the need to consider the widest possible range of approaches. It further concluded that the Borough's characteristics meant its capacity to accommodate substantial additional growth is inherently constrained, and that the scope for identifying materially different strategic spatial options was correspondingly restricted. Discrete strategic spatial alternatives were not therefore identified at that stage. Instead, the Interim SA considered in principle the sustainability implications of five delivery mechanisms without preparing SA matrices, on the basis that these would follow once more detailed and discrete options had been developed.
- 5.2.19. The five mechanisms and the Interim SA's conclusions on each are summarised in Table 5.2. The full commentary is set out in Chapter 4 of the Interim SA Report.

Table 5.2: Summary of Interim SA Findings on Housing Delivery Mechanisms (June 2026)

Mechanism	Principal Benefits Identified	Principal Constrains and Effects Identified
i. Prioritising brownfield sites	The most sustainable mechanism in principle. Aligns with national policy and efficient land use; the Borough's brownfield supply lies within built-up areas with good public transport and active travel access. Offers opportunities for remediation, green infrastructure and town centre regeneration.	The resource is limited in number and scale. Sites are typically small urban infill plots delivering modest yields. Insufficient on its own to meet overall housing needs.

Mechanism	Principal Benefits Identified	Principal Constrains and Effects Identified
ii. Increasing densities	Optimises delivery within the established urban area and makes efficient use of land already served by infrastructure. A moderate uplift on suitable town centre sites would support regeneration, vitality and sustainable travel.	The Borough is predominantly low-rise, so substantial upward intensification risks harm to local character, townscape and to the significance and setting of heritage assets in the historic core. Most other opportunities are dispersed suburban infill plots with limited scope for uplift. A differentiated approach informed by the forthcoming Landscape Character Assessment is required.
iii. Loss of other spaces	Capable of generating a substantial uplift in supply, considerably expanding capacity to meet identified needs. Smaller, targeted release of land of lower environmental or recreational value, or land surplus to functional requirements, may be proportionate where effects are managed through design and compensatory provision.	If applied on a widespread basis, would give rise to broad and permanent negative effects on biodiversity, climate resilience, health and wellbeing and the character of the Borough, and would undermine Tamworth's ability to provide high-quality places in which to live and work.
iv. Delivering outside of the Borough	Growth in the wider Greater Birmingham and Black Country Housing Market Area, further from Tamworth, is less likely to generate direct effects within the Borough.	Effects are inherently difficult to quantify. Growth close to the Borough boundary would be functionally connected to Tamworth, generating additional users of its services and infrastructure while typically being disconnected from its sustainable travel network. Development on the northern periphery in Lichfield is of particular concern given existing congestion at Fountain Junction.
v. Delivering on Green Belt	The Borough contains approximately 211 ha of West Midlands Green Belt on the southern periphery beyond Hockley and Dosthill, which the evidence indicates makes a moderate contribution to Green Belt purposes and may be capable of being considered grey belt. Several parcels are well related to the southern urban form and to existing public transport, active travel and local services.	Release would permanently reduce openness and result in the loss of greenfield land, with effects on landscape character, visual amenity, biodiversity and the perceived separation between Tamworth and surrounding settlements that are inherently difficult to mitigate. Parcels further from established areas would be less sustainable. A focused and proportionate release prioritising poorly performing, well-connected parcels was identified as the more appropriate approach.

5.2.20. The Interim SA concluded that these findings would support the Council as it continued to refine its reasonable alternative approaches to delivering housing growth, and that discrete options would be formulated and appraised through matrices once the capacity and deliverability work was complete.

Reasonable Alternatives at the Regulation 19 Stage

- 5.2.21. The capacity and delivery work has now been completed, and two reasonable alternatives have been developed for how the deliverable proportion of the housing requirement should be distributed. Delivery outside the Borough is not tested as a discrete alternative as it is the necessary consequence of the shortfall arising under either alternative and is addressed through the Duty to Cooperate.
- 5.2.22. The supply figures in Table 5.3 are drawn from the Pre-Submission Local Plan and reflect the Council's updated evidence base, including the Strategic Housing Land Availability Assessment (SHLAA, June 2026) and the subsequent Site Selection Paper (July 2026), which identify a number of sites assessed as suitable, achievable and available for housing allocation, and the Southern Staffordshire Strategic Green Belt Assessment. These figures underpin the two reasonable alternatives for the distribution of housing growth set out in Boxes 5.3 and 5.4 and are carried through into the full assessment that follows.

Table 5.3: Identified Housing Supply by Delivery Source

Delivery Source	Homes
Existing completions (April 2022 to date)	1,030
Non-Green Belt allocated sites	1,064
Green Belt allocations	856
Town centre regeneration sites	400
Windfall development	595
Total identified supply	3,945

- 5.2.23. Drawing on the identified supply set out in Table 5.3, two reasonable alternatives have been developed for how that supply should be distributed, set out in Box.3. Each draws on the same base of non-Green Belt supply (brownfield land, density uplift, town centre regeneration and windfall development) but varies the extent to which Green Belt land is also included.

Box 5.3: Housing Distribution Alternatives Identified at Regulation 19 Stage	
Housing Distribution Alternative 1	Meet as much of the requirement as possible from brownfield land, increased densities on suitable urban sites, town centre regeneration and windfall development, without any release of land from the Green Belt. This delivers 3,089 homes towards the total requirement of 8,608, leaving an unmet need of 5,519 homes.

Housing Distribution Alternative 2 (preferred)	As Alternative 1, together with a focused and proportionate release of Green Belt land on the southern periphery, identified in the Southern Staffordshire Strategic Green Belt Assessment as making a moderate contribution to Green Belt purposes and with potential grey belt characteristics. This delivers a further 856 homes, giving a total of 3,945 homes and leaving an unmet need of 4,663 homes to be addressed through the Duty to Cooperate with authorities in the Greater Birmingham and Black Country Housing Market Area.
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5.2.24. The likely effects of the two alternatives against the SA objectives are presented in Table 5.4, with supporting commentary in the paragraphs that follow.

Table 5.4: Summary of Likely Significant Effects of Housing Distribution Alternatives

Reasonable Alternative	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14	SAO15	SAO16	SAO17
Housing Distribution Alternative 1	++	+/-	+/-	+/-	+	+	+/-	-	-	-	-	-	-	-	-	0	0
Housing Distribution Alternative 2	++	+/-	+/-	+/-	+	++	-	-	-	-	-	-	-	-	-	-	-

5.2.25. Alternative 1 performs most favourably against the environmental, climate change, land resource and sustainable travel objectives (SAO7 to SAO13 and SAO15 to SAO17). It makes exclusive use of the Borough's existing brownfield, urban and windfall capacity without any loss of Green Belt land and therefore avoids the diminution of openness and the effects on landscape character, biodiversity and the perceived separation between Tamworth and surrounding settlements associated with Green Belt release. It scores neutral against SAO16 (Land Resources) and SAO17 (Waste), reflecting the efficient re-use of previously developed land and the absence of new land take.

5.2.26. Alternative 1 performs significantly less well against SAO6 (Housing). It would deliver only 3,089 homes towards the 8,608 requirement, requiring 5,519 homes to be exported to neighbouring authorities without a commensurate sustainability benefit within the Borough, given that the Green Belt land in question makes only a moderate contribution to Green Belt purposes and is physically well related to the southern urban form. The effects of that additional unmet need would be experienced in the authorities where the growth is ultimately accommodated and are not capable of assessment within this SA.

5.2.27. Alternative 2 performs better than Alternative 1 against SAO6 (Housing), scoring major positive by reason of the additional 856 homes delivered and the corresponding reduction in unmet need. This is accompanied by increased adverse effects across several environmental and land-use objectives, in particular SAO12 (Flood Risk), SAO13 (Biodiversity), SAO15 (Landscape and Townscape) and SAO16 (Land Resources), which move from minor to major negative, and SAO17 (Waste),

which moves from neutral to minor negative. These reflect the greenfield land take involved and the loss of permeable surfaces associated with development on the southern periphery.

- 5.2.28. Both alternatives score major negative against SAO14 (Historic Environment), reflecting the cumulative pressure that housing growth of any distribution places on the Borough's heritage assets and their settings, given the concentration of designated assets within and around the historic core and the limited scope to avoid sensitive locations in a Borough of this size. Both also score major positive against SAO1 (Economy) and positive against SAO5 (Quality of Life), and mixed against SAO2 (Employment), SAO3 (Accessibility) and SAO4 (Health and Wellbeing), where the benefits of an increased population supporting the viability of services are balanced against the risk of capacity pressures on infrastructure.
- 5.2.29. Alternative 2 is considered to represent the most sustainable reasonable alternative and is the approach taken forward in the Pre-Submission Local Plan, notwithstanding that it involves a limited release of Green Belt land. It maximises delivery from brownfield land, increased densities, town centre regeneration through Policies TC3 and TC4 and windfall development and limits the scale of Green Belt release to that judged necessary to make a proportionate difference to deliverability, directed to parcels which perform least strongly against Green Belt purposes and which are well related to the existing urban form. The increased adverse effects relative to Alternative 1 are considered proportionate to the targeted and limited scale of release and to the housing benefit secured.

Conclusion on the Distribution of Housing Growth

- 5.2.30. Strategic Policy SP1(4) accordingly confirms the release of 42.1 hectares of Green Belt land on the Borough's southern periphery, delivering approximately 856 homes across two allocated sites (20/090: Land at Gorsy Bank Road and 18/007 Land off Wigford Road). Both sites are appraised individually through the site-specific sustainability appraisals presented in Chapter 6 of this report and Appendix G, alongside all other proposed housing allocations and regeneration sites, and the mitigation identified through those appraisals is carried into the relevant allocation policies.

Addressing Tamworth's Unmet Housing Need

- 5.2.31. Even with the Green Belt release described above, the Pre-Submission Local Plan is only able to identify delivery of 3,945 homes from the sources set out in Table 5.3. This leaves a residual unmet need of 4,663 homes which the Council proposes to address through continued engagement with neighbouring authorities in the Greater Birmingham and Black Country Housing Market Area.
- 5.2.32. The effects of this unmet need will be experienced principally in the authorities where the additional growth is ultimately accommodated and are not capable of being assessed within this SA, which is confined to the Tamworth Local Plan area.

5.3. Employment

Employment Growth Options

- 5.3.1. As with housing, the Council has identified and assessed reasonable alternatives for the overall quantum of employment land at successive stages of plan-making. Three

alternatives have been identified in total and updated evidence confirms that one remains reasonable at Regulation 19, refined to reflect existing commitments.

Alternatives Identified at the Issues and Options Stage (September 2022)

- 5.3.2. Earlier in the plan-making process the Council identified an initial option for the amount of employment land to be provided through the emerging TBLP, derived from the HEDNA (2019), which was the most up-to-date evidence available at the time of the consultation. Although it did not cover the full plan period and pre-dated the pandemic, it provided the most robust basis for identifying an early employment land option at that stage. As with the housing growth options identified at this stage, it was not subject to formal Sustainability Appraisal but was reviewed through a proportionate internal sustainability exercise.

Box 5.4: Employment Growth Alternative at the Issues and Options Stage	
Employment Growth Option A	Employment need based on the 2019 HEDNA available at the time of the Issues and Options consultation – 8.8 ha of new employment land for the period 2018 to 2036.

Alternatives Identified at the Advanced Regulation 18 Stage (June 2026)

- 5.3.3. The options were subsequently updated to reflect the latest evidence, including the updated HEDNA (2025), which for the first time covered the full plan period. The updated HEDNA identifies an employment land requirement informed by a range of modelling approaches, drawing on labour supply and demand, past delivery trends, forecasts, professional judgement and adjustments for existing permissions. This produced Employment Growth Option B. As part of the same modelling work, the HEDNA also assessed employment need based on projected job growth using the Experian baseline, which was considered a reasonable and proportionate alternative to test at that stage. This produced Employment Growth Option C.
- 5.3.4. In light of the updated HEDNA, Employment Growth Option A was no longer considered a reasonable alternative and was discounted. It was derived from superseded evidence, covered a period ending seven years before the end of the plan period, and pre-dated both the pandemic and the structural changes in industrial and logistics demand that followed it. The two alternatives taken forward for appraisal through the Interim SA are set out in Box 5.6.

Box 5.5: Employment Growth Alternatives Identified at the Advances Regulation 18 Stage	
Employment Growth Option B	Employment need based on updated and adjusted HEDNA (2025) evidence – 25 ha of new employment land over the plan period.
Employment Growth Option C	Employment need based on the Experian baseline job-growth projection – 7.8 ha of new employment land over the plan period, derived from the calculation in the 2025 HEDNA.

Summary of the Interim SA Findings

- 5.3.5. Options B and C were appraised against the full SA Framework in the Interim SA Report (June 2026), where the assessment matrix and supporting commentary are set out in full. In summary, the Interim SA found that Option B would deliver a substantially larger supply of employment land, providing greater scope to support economic growth and to accommodate a wider range of business needs, and scored it major positive against SAO1 (Economy) and SAO2 (Employment). Option C would contribute positively to economic activity but to a more limited extent. Both scores were qualified as uncertain, as the extent to which the benefits would be realised depends on market demand, site suitability and the wider economic context.
- 5.3.6. Against this, the Interim SA found that the larger quantum under Option B would give rise to more extensive negative effects including, a greater likelihood of greenfield land take given the operational space employment uses require and the constrained nature of the Borough, alongside associated risks for biodiversity, landscape character and the loss of other recreational and ecological functions; a greater reduction in permeable surfaces with implications for flood risk; and higher levels of traffic generation with associated effects on congestion, air quality and carbon emissions. Option B also scored minor negative against SAO6 (Housing), reflecting the effect of a larger employment land take on the Borough's already limited capacity for housing delivery. Option C was anticipated to perform considerably better against the environmental objectives and scored positively against SAO16 (Land Resources) by reason of its lower land take.
- 5.3.7. The Interim SA concluded that Option B would deliver the greatest economic benefit but with the more extensive adverse effects, and that Option C represented a more sustainable balance between economic growth and environmental and social considerations, albeit delivering positive outcomes on a more modest scale. As with housing, it recognised that the Borough's limited land supply is likely to be the determining factor in what can realistically be accommodated, and that the higher level of provision associated with Option B may be difficult to accommodate entirely within the Borough.

Reasonable Alternatives at the Regulation 19 Stage

- 5.3.8. The completed 2025 HEDNA identifies a total employment land requirement of 25 hectares for the Borough, comprising 24 hectares of industrial land and 1 hectare of office floorspace. Existing office permissions and commitments already exceed the identified office need and no further office allocation is required. For industrial land, once extant permissions and commitments are taken into account, the Pre-Submission Local Plan proceeds on the basis of a net requirement of 21.8 hectares, equivalent to 87,200 sqm of floorspace.
- 5.3.9. The relationship between that figure and the options tested at Regulation 18 should be understood as follows. The net requirement of 21.8 hectares is not a new or different evidence position and does not represent a fresh reasonable alternative. It is Employment Growth Option B carried forward and refined, resting on the same HEDNA evidence base and the same assessment of need. It is expressed as a net rather than a gross figure once the office surplus and extant industrial permissions are deducted. As such, the difference between 25 hectares and 21.8 hectares reflects supply already committed rather than any change in the level of need identified. The sustainability effects identified in respect of Option B in the Interim SA

therefore remain the relevant starting point at Regulation 19, subject to the reduction in land take that the netting-off exercise implies.

- 5.3.10. Employment Growth Option C has not been carried forward as a reasonable alternative at Regulation 19. The Experian baseline is a single job-growth projection and one input to the HEDNA's modelling rather than its recommendation. The HEDNA's recommended figure, informed by past delivery trends, labour supply modelling and professional judgement in addition to job-growth forecasting, represents the most robust and up-to-date basis for planning for the Borough's employment land needs over the full plan period. Planning for 7.8 hectares would under-provide against identified economic need by a substantial margin, would be contrary to the requirement in the NPPF to plan positively for employment land, and would work against Strategic Objective 3 and SAO1 (Economy) and SAO2 (Employment). The Interim SA found that Option C would perform better against a number of environmental objectives, but that advantage is realised only by not meeting identified need, and an option which fails to meet a core objective of the plan is not a reasonable alternative for the purposes of the SEA Regulations.
- 5.3.11. No reasonable alternative therefore remains for the overall quantum of employment land. As with housing, the reasonable alternatives at Regulation 19 concern how that requirement should be delivered and distributed.

Employment Distribution

Summary of the Position to the End of the Advanced Regulation 18 Stage

- 5.3.12. At the Issues and Options stage, four initial approaches for delivering employment growth were identified alongside the employment growth option presented in the same consultation:
- retaining all currently allocated employment sites (Option A)
 - allowing the loss of specific sites to alternative uses while retaining a buffer of land above identified need (Option B)
 - allowing the loss of specific sites without retaining a buffer (Option C), and
 - retaining existing allocations but applying a flexible criteria-based policy permitting the loss of any proposed employment site to an alternative use (Option D).
- 5.3.13. Each of these was framed as a choice about how much existing employment land could be released to other uses, and each was developed at a time when identified employment needs were relatively low and were expected to be met largely through existing allocations that had not yet been delivered. Subsequent evidence indicates a substantially higher level of need and the Interim SA concluded that Options A to D were not reasonable in that changed context and set them aside, noting that they might be revisited should a lower employment need ultimately be selected.
- 5.3.14. As the Regulation 19 position confirms a net requirement of 21.8 hectares, that contingency does not arise and Options A to D remain set aside. The protection of existing employment areas is instead addressed through Policy EM1, which is appraised in Chapter 6 of this report.

- 5.3.15. The Interim SA instead appraised two broad delivery mechanisms in principle, again without matrices. Its conclusions are summarised in Table 5.5.

Table 5.5: Summary of Interim SA Findings on Employment Delivery Mechanisms (June 2026)

Mechanism	Principal Benefits Identified	Principal Constrains and Effects Identified
i. Delivering need through new sites	Would strengthen the local economy, broaden the employment base and support inward investment, particularly where sites are accessible and well connected. Improves residents' access to jobs, supports more sustainable travel behaviour and retains economic activity locally.	The availability of suitable land is limited; potential sites are typically smaller infill plots within established suburban areas that are often poorly suited to employment uses. Accommodating growth in neighbouring authorities carries more uncertain effects and peripheral siting could increase outward commuting and car reliance.
ii. Intensification of existing employment land	A sustainable means of optimising land use while supporting economic growth. Reduces pressure on undeveloped land, focuses growth in well-served locations, and creates opportunities to regenerate older or lower-quality employment areas and deliver modern units suited to the local business base.	Constrained by the capacity of existing areas to accommodate more intensive activity. Higher floorspace would generate increased traffic and activity, with implications for local amenity, congestion and emissions, and some areas have physical, environmental or accessibility constraints limiting their suitability for uplift.

Reasonable Alternatives at the Regulation 19 Stage

- 5.3.16. Drawing on those findings and on the completed capacity work, three reasonable alternatives have been considered for how the requirement of 21.8 ha (87,200 sqm) should be delivered, set out in Boxes 5.7 to 5.9. Each varies the balance between new allocated employment land and intensification of existing employment areas.

Box 5.6: Employment Growth Alternatives Identified at the Advanced Regulation 18 Stage	
Employment Distribution Alternative 1	Meet the full 21.8 ha (87,200 sqm) requirement through new allocated employment land only.
Employment Distribution Alternative 2 (preferred)	A single new allocation of approximately 9.8 ha (Policy SP5), with the balance of the requirement delivered through intensification of, and extensions within, existing employment areas protected under Policy EM1.
Employment Distribution Alternative 3	Meet the requirement solely through intensification of existing employment areas, with no new allocation.

- 5.3.17. The likely effects of the three employment distribution alternatives are presented in Table 5.6, with supporting commentary provided below.

Table 5.6: Summary of Likely Significant Effects of Employment Distribution Alternatives

Reasonable Alternative	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14	SAO15	SAO16	SAO17
Employment Distribution Alternative 1	+	++	+	+/-	0	-	-	-	-	-	+/-	-	-	?	-	-	-
Employment Distribution Alternative 2	++	++	+	+/-	0	-	-	-	-	+/-	+/-	-	-	+/-	-	+/-	-
Employment Distribution Alternative 3	+	++	0	0	0	0	--	--	-	+/-	-	+/-	+/-	+/-	+/-	+	+/-

- 5.3.18. Alternative 1 would deliver the fullest and most certain supply of employment land, scoring positively against SAO1 (Economy), SAO2 (Employment) and SAO3 (Accessibility). This is achieved at a substantial environmental cost. It scores major negative across the majority of the environmental, land resource and landscape objectives, including SAO8 (Air, Light and Noise Pollution), SAO9 (Soils and Water Pollution), SAO12 (Flood Risk), SAO13 (Biodiversity), SAO15 (Landscape and Townscape), SAO16 (Land Resources) and SAO17 (Waste), reflecting the scale of greenfield or Green Belt land take that would be required to allocate the full 21.8 hectares as new employment land. It also scores major negative against SAO6 (Housing), as land take on that scale would reduce the Borough's already limited capacity for housing delivery, in direct tension with the strategy set out earlier in this chapter. The effect on SAO14 (Historic Environment) is uncertain, as it would depend on the specific sites brought forward. Given the findings of the SHLAA and the Site Selection Paper, it is also doubtful whether sufficient suitable land could be identified to deliver this alternative in practice.
- 5.3.19. Alternative 3 avoids any new land take and performs most favourably against SAO16 (Land Resources), with largely mixed or neutral effects across the broader environmental and climate change objectives (SAO10 to SAO15 and SAO17). However, concentrating additional activity within existing employment areas results in major negative effects against SAO7 (Sustainable Travel) and SAO8 (Air, Light and Noise Pollution), reflecting the increased traffic and operational activity that would be generated within areas that in some cases already experience accessibility and amenity constraints. While it scores positively against SAO1 and SAO2, past delivery rates indicate that intensification alone would not come close to meeting the full 21.8 hectare requirement. This alternative would therefore constrain the

Borough's ability to respond to identified economic need and would not deliver a core objective of the plan.

- 5.3.20. Alternative 2 scores major positive against both SAO1 (Economy) and SAO2 (Employment), the strongest performance of the three alternatives against the economic objectives, as the combination of a deliverable new allocation with intensification of existing employment areas provides the most realistic prospect of meeting identified need while supporting economic diversification. It scores major negative against SAO8 (Air, Light and Noise Pollution), SAO9 (Soils and Water Pollution) and SAO12 (Flood Risk), but these effects are shared in large part with the other alternatives and are capable of mitigation through the criteria in the allocation policy and through other Pre-Submission Local Plan Policies. Critically, it avoids the more extensive major negative effects of Alternative 1 against SAO13 (Biodiversity), SAO15 (Landscape and Townscape), SAO16 (Land Resources) and SAO17 (Waste), and avoids the major negative effect against SAO6 (Housing), preserving the Borough's residual capacity for housing delivery.

Conclusion on the Distribution of Employment Growth

- 5.3.21. Alternative 2 is considered to represent the most sustainable reasonable alternative and is the approach taken forward in the Pre-Submission Local Plan. It applies to employment land the same principle applied to housing: making the most efficient and sustainable use of the Borough's very limited land supply by prioritising intensification of existing employment areas ahead of new land take, and limiting new allocation to the minimum necessary to provide a realistic prospect of meeting identified need. It represents the most sustainable balance available between supporting economic growth and minimising environmental and land-use effects.
- 5.3.22. Strategic Policy SP1 accordingly directs the new employment allocation of approximately 9.8 hectares to Land South of the A5 (site ref: 24/591), with the balance of the requirement to be delivered through intensification of existing employment areas under Policy EM1. The allocated site is appraised individually through the site-specific sustainability appraisals presented in Chapter 6 of this report and Appendix G, alongside all other proposed allocations and regeneration sites.

5.4. Retail and Town Centre Growth

- 5.4.1. The Town Centre and Retail Study identifies a need for 2,700 sqm of comparison goods floorspace by 2034, with a further 800 sqm potentially required by 2043 subject to an updated assessment, and no identified need for additional convenience goods floorspace over the plan period. Unlike the housing and employment requirements, this figure is a technical output of a needs assessment rather than a policy choice between competing options for the scale of growth, and reasonable alternatives have not, therefore, been tested for the retail quantum itself.
- 5.4.2. The spatial choice that has been tested is the location of new retail floorspace. The Draft Local Plan directs this to the town centre, focused on the Gungate and Ankerside regeneration opportunity areas (Policies TC3 and TC4). This is consistent with the sequential approach required by national policy, supports the Plan's town centre regeneration objectives, and is considered preferable to any reasonable alternative involving out-of-centre provision, which would perform materially worse against sustainable transport, town centre vitality and climate change objectives.

- 5.4.3. Taken together, the approach set out in Policies TC3 and TC4 is considered to represent the most sustainable reasonable alternative available to the Council for meeting Tamworth's identified retail and town centre need.
- 5.4.4. The Plan directs all new comparison goods floorspace to the Gungate and Ankerside regeneration opportunity areas within the town centre, making the most efficient use of existing town centre capacity, supporting the Plan's wider regeneration objectives, and applying the sequential approach required by national policy ahead of any out-of-centre provision.
- 5.4.5. No reasonable alternative has been identified that would meet the identified retail need without giving rise to materially greater harm to sustainable transport, town centre vitality or climate change objectives than the town centre-focused approach taken forward, consistent with the reasoning set out in paragraph 5.4.2 above.

5.5. Reasonable Alternative Development Sites

- 5.5.1. Reasonable alternative development sites have been identified progressively throughout preparation of the TBLP. In Tamworth, the identification of site options is determined primarily by land availability, reflecting the limited number of sites with realistic development potential.
- 5.5.2. At the Advanced Regulation 18 stage all sites considered to have a reasonable prospect of delivery were treated as reasonable alternatives and appraised in the Interim SA Report (June 2026). These comprised:
 - 30 housing sites
 - 1 employment site
 - 2 mixed-use regeneration sites
- 5.5.3. The Interim SA did not identify sustainability effects that required the exclusion of any site capable of being delivered.

Refinement of Reasonable Alternatives

- 5.5.4. Between the Advanced Regulation 18 and Regulation 19 stages, the Council undertook updated feasibility work to confirm whether the earlier reasonable alternative sites remained appropriate for allocation. This included updated assessment of availability, landowner intention, environmental and heritage constraints, flood risk, highways considerations and the relationship of sites to the spatial strategy and committed development.
- 5.5.5. Following that work, 22 sites with a combined former indicative capacity of 914 dwellings are no longer proposed for allocation in their own right. No site has been removed on the basis of sustainability effects identified in the Interim SA. These sites do not form a single category and the reasons for their treatment differ in ways which are material to the appraisal of reasonable alternatives. They are therefore presented in three parts.
- 5.5.6. Ten sites, with a combined former indicative capacity of 262 dwellings, were appraised as housing site options through the Interim SA Report and are no longer carried forward. These are set out in Table 5.7a. As reasonable alternatives which

have been discounted, the reasons for their removal are recorded in accordance with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004. Their appraisals remain documented in the Interim SA Report and are not repeated in this SA Report.

- 5.5.7. Three sites, with a combined indicative capacity of 400 dwellings, were appraised at the Advanced Regulation 18 stage as regeneration opportunity areas (ROA1: Ankerside and ROA2: Gungate) rather than as individual housing site options. These sites have not been discounted. They continue to be relied upon and are delivered through the mixed-use town centre regeneration allocations, with their capacity of 400 dwellings included within the identified supply set out in Table 5.3. They are recorded in Table 5.7b for completeness and to avoid any implication that this capacity has been lost to the supply.
- 5.5.8. The remaining nine sites, with a combined former indicative capacity of 252 dwellings, were not appraised as reasonable alternatives at the Advanced Regulation 18 stage. As set out in Box 5.1 of the Interim SA Report, the pool of reasonable site options comprised those sites identified through the SHLAA as deliverable or developable, subject to an interim review of their continued reasonableness. Eight of these nine sites are small Council-owned sites, car parks or operational land for which no owner intention to develop has been identified, or which fall below the threshold for allocation. Where there is no reasonable prospect of a site coming forward for housing, it is not a realistic alternative for the purposes of the SEA Regulations and has not been appraised as one. These sites are set out in Table 5.7c.
- 5.5.9. One of the sites recorded in Table 5.7c warrants specific comment. Land South of Overwoods Road (22/093) was not appraised as a site option at the Advanced Regulation 18 stage but now forms part of the proposed allocation at Land at Gorsy Bank Road (20/090) following the consolidation of adjoining parcels. The land is appraised at Regulation 19 as part of that allocation, and the likely effects of developing the consolidated site are reported in Chapter 6 and Appendix G.
- 5.5.10. Tables 5.7a to 5.7c set out the sites concerned and the reasons in each case. Further detail on the site selection process is provided in the Council's Site Selection Paper (July 2026), published as part of the TBLP evidence base.

Table 5.7a: Regulation 18 Stage Reasonable Alternatives, no longer proposed for allocation

SHLAA Ref	Site	Former capacity	Reason for discounting	Interim SA ref
18/011	The Alders and Tame House	13	County Council-owned land; owner has indicated it does not wish the site to be allocated.	H7
18/015	Land off Gorsy Bank Road	50	Incorporated into the Land at Gorsy Bank Road (20/090) allocation.	H9
18/019	Northern Part of Beauchamp Employment Area	29	Land currently in alternative use with no known owner intent to develop.	H11
18/023	Cotons Van Hire	7	Under new ownership; no known owner intention to develop.	H12

SHLAA Ref	Site	Former capacity	Reason for discounting	Interim SA ref
18/025	Former Wilnecote Youth Centre and adjacent former Social Services building	24	Under new ownership; in alternative use with no known owner intention to develop.	H13
18/027	Seaton Hire and Land South of Wilnecote Lane	25	Owner indicated no intention to develop.	H14
18/029	Wilnecote Railway Sidings	21	Under new ownership; no known owner intention to develop.	H16
20/089	Land off Peelers Way, Kettlebrook	53	Material considerations — proximity to nature reserve, flood risk and connectivity.	H19
23/574	Anker Sidings	10	Owner intent unknown; last contact in 2023.	H26
23/575	Land Adjacent to Millfield House	30	Required to be used as open space by way of a Section 106 agreement.	H27
Total		262		

Table 5.7b: Sites Appraised as Regeneration Opportunity Areas

SHLAA Ref	Site	Former capacity	Reason for discounting	Interim SA ref
23/597	Ankerside	250	Delivered as the Ankerside mixed-use town centre regeneration allocation.	ROA1
23/184	Spinning School Lane Car Park	100	Delivered within the Gungate mixed-use town centre regeneration allocation.	ROA2
18/008	Former Community and Justice buildings, Spinning School Lane	50	Delivered within the Gungate mixed-use town centre regeneration allocation.	ROA2
Total		400	Equals the town centre regeneration figure in Table 5.3.	

- 5.5.11. The two mixed-use regeneration allocations are appraised through the assessment of Policies TC3 and TC4 in Chapter 6, rather than through the site allocation appraisals in Appendix G, reflecting the mixed-use and phased nature of the development propose

Table 5.7c: Sites Never Appraised as Reasonable Alternatives

SHLAA Ref	Site	Former capacity	Reason for discounting
22/093	Land South of Overwoods Road	181	Not appraised as an option at Regulation 18. Now forms part of the Land at Gorsy Bank Road (20/090) allocation and is appraised within it at Regulation 19. See note below.
23/465	Garages and parking off Lichfield Street	17	Council-owned; no owner intention to develop.
18/024	Car Park off Park Farm Road	10	Council-owned; no owner intention to develop.
23/466	Land associated with Lichfield Street 1	10	Council-owned; no owner intention to develop.
23/468	Land associated with Lichfield Street 3	10	Council-owned; no owner intention to develop.
23/185	Marmion Street Car Park 1	9	Council-owned; no owner intention to develop.
23/175	Land adjacent to Queensway	5	Council-owned; no owner intention to develop.
23/188	Aldergate Car Park	5	Council-owned; no owner intention to develop.
18/012	41 & 43 Ashleigh Drive	5	Below the allocation threshold; counted through the windfall allowance.
Total		252	

Regulation 19 Reasonable Alternatives

- 5.5.12. The remaining sites comprise those that continue to be feasible, available and deliverable at Regulation 19 and form the reasonable alternatives for this stage of plan preparation. These are set out in Table 5.8 and comprise:
- 18 sites for residential development
 - 1 site for employment development
- 5.5.13. Tamworth's limited land supply means that all remaining suitable sites are required to support the development strategy. Consequently, the Regulation 19 reasonable alternatives correspond directly to the sites proposed for allocation in the Pre-Submission Local Plan, reflecting the absence of competing site choices. The appraisal of the proposed allocations is presented in Chapter 6.

Table 5.8: Reasonable Alternative Sites at Regulation 19

Site Ref.	Pre-Submission Local Plan Allocation Name	Allocation Type	Indicative Capacity	Previous Reference at the Interim SA Stage
23/584	459 Watling Street and Adjacent Land	Housing	7	H28 Land off Watling Street
18/009	Millfield House, Lichfield Road	Housing	11	H6 Millfield House
18/001	Norris Bros Garage, Lichfield Street	Housing	20	H1 Norris Bros
18/013	Ashlands Farm, Ashby Road	Housing	177	H2 Ashlands Farm, H3 Ashlands Farmhouse and H8 Land South of Ashby Road combined.
18/030	Land North of Hedging Lane (Central Hydraulics)	Housing	25	H17 Land Adjacent Tame Valley Alloys
18/004	Land East of Dunstall Park Primary School	Housing	10	H4 Land Adjacent to Dunstall Farm SUE
18/018	Arriva Bus Depot, Aldergate	Housing	40	H10 Arriva Bus Depot
22/091	Land Fronting Windmill Farm, Coton Lane	Housing	43	H21 Land Fronting Windmill Farm, Coton Lane
22/095	Land North of Moor Lane	Housing	61	H23 Land North of Moor Lane
23/573	Marmion House, Lichfield Street	Housing	68	H25 Marmion House
22/096	Land Opposite Mariner, Coton Lane	Housing	90	H24 Land at Coton Lane
23/515	Former Tamworth College Site, Croft Street	Housing	123	H30 Tamworth College Site
23/585	Land Between Dunstall Lane and Coventry Canal	Housing	166	H29 Land West of Dunstall Lane
22/094	Land South of Ashby Road	Housing	200	H22 Land South of Ashby Road
18/033	Former Co-Op Filling Station, Bonehill Road	Housing	9	H18 Co-Op Filling Station
20/090	Land at Gorsy Bank Road	Housing	245	H20 Land at Gorsy Bank Road
18/007	Land off Wigford Road	Housing	611	H5 Land off Tamworth Road/Wigford Road
18/028	Treetops Garage, Dosthill	Housing	14	H15 Treetops Garage Dosthill
24/591	Land South of the A5	Employment	9.8ha	E1 Land South of the A5

5.6. Summary

- 5.6.1. Reasonable alternatives have been identified and appraised for each element of the TBLP where a genuine choice has existed, and the reasons for the alternatives dealt with at each stage are recorded in the preceding sections. Where alternatives have been refined or discounted as national policy and the evidence base have evolved, those reasons are recorded so that the audit trail of decision-making is complete. Where the Borough's land supply, rather than the choice between options, is the operative constraint on what can be delivered, that is recorded as such.
- 5.6.2. The reasoned justification for the spatial strategy as a whole, including the exceptional circumstances relied upon for Green Belt release, is set out in the Pre-Submission Local Plan and its supporting evidence base.

Chapter 6: Assessment of the Regulation 19 Pre-Submission Local Plan

6.1. Introduction

- 6.1.1. The proposed policies and site allocations within the Pre-Submission Local Plan have been appraised using the methodology set out in Chapter 4. The appraisal identifies the likely significant effects of implementing the local plan when judged against the SA Framework.
- 6.1.2. The sections that follow summarise the appraisal findings for each component of the Pre-Submission Local Plan. This is followed by an assessment by SA objective of the plan as a whole, including any cumulative, synergistic and secondary effects.
- 6.1.3. These assessments have considered the potential effects which would result from implementation of the policies and sites in isolation and in general do not consider potential mitigation or enhancement measures which could help to improve the sustainability performance of the policy or site, where this would be from other elements in the local plan or non-local plan related mitigation/enhancement. Where appropriate, the potential mitigation/enhancement is presented as an addition to the specific assessments.

6.2. Vision and Strategic Objectives

- 6.2.1. The Local Plan Vision and Strategic Objectives have been refined following recommendations set out in the SA Interim Report (Appendix E).
- 6.2.2. A compatibility assessment has been undertaken between the SA objectives and the Local Plan Vision and Strategic Objectives, as set out in Chapter 2, in order to identify any areas of alignment or potential tension. The results of this assessment are presented in Table 6.1.
- 6.2.3. Where potential incompatibilities are identified, these will need to be taken into account during the appraisal process and may require consideration of appropriate mitigation measures or alternative approaches considered within the local plan.
- 6.2.4. A summary of the likely effects is presented below for each component of the appraisal. A concluding statement on the combined effects of the Vision and Strategic Objectives is then provided at the end of the section.

Table 6.1: Summary of Likely Effects for Vision and Objectives

	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14	SAO15	SAO16	SAO17
Vision and Objectives	Economy	Employment	Accessibility	Health	Quality of Life	Housing	Sustainable Travel	Air, Light and Noise Pollution	Soils and Water Pollution	Minimising Contributions to Climate	Adaptation to Climate Change	Flood Risk	Biodiversity	Historic Environment	Landscape and Townscape	Land Resources	Waste
Vision	+	+	+	+	+	+	+	?	?	?	?	?	?	+	+	?	+
Objective 1	?	?	+	?	?	?	+	?	+	+	?	?	?	?	?	+	0
Objective 2	-	0	?	+	?	+	?	?	?	-	?	-	?	?	?	-	?
Objective 3	+	+	?	+	+	0	?	?	?	?	0	0	?	0	0	?	0
Objective 4	+	+	+	+	+	?	?	?	0	?	?	0	0	-	+	+	+
Objective 5	?	0	+	+	+	?	0	+	+	+	?	0	0	+	+	+	+
Objective 6	0	0	0	+	0	0	+	+	+	+	+	+	+	+	0	0	+
Objective 7	0	0	0	+	+	?	0	+	+	+	+	+	+	0	+	0	0
Objective 8	0	0	+	+	+	+	+	+	0	+	0	0	0	0	+	0	0
Objective 9	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Objective 10	0	0	+	+	+	0	+	+	?	+	+	+	+	0	+	0	0
Objective 11	+	+	+	+	+	0	+	+	0	+	0	0	?	0	0	0	0
Objective 12	+	+	+	?	?	+	+	?	?	0	?	?	?	0	?	+	0

Summary of Likely Effects

The Vision for Tamworth in 2043

- 6.2.5. The Vision sets out a clear and ambitious future for Tamworth, supporting sustainable development across economic, social and environmental themes. It responds directly to key issues facing the borough and aims to meet the needs of the local population while conserving the natural and historic environment. The Vision also makes clear that growth will be managed in a way that balances economic, social and environmental objectives, providing a coherent foundation for achieving positive outcomes across the SA Objectives.
- 6.2.6. The Vision commits to delivering high-quality, affordable and locally distinctive homes in appropriate locations, including adaptable homes that can meet changing needs over residents' lifetimes. These ambitions support positive effects for housing and contribute to wider quality of life and community cohesion. The emphasis on adaptable homes also aligns with long-term health and wellbeing.
- 6.2.7. The Vision promotes economic growth through diversification of the local economy, new business investment and support for existing businesses to stay and grow. It also highlights opportunities to support the education sector in improving attainment. Together, these ambitions are expected to generate positive effects for economic growth and employment, with associated benefits for accessibility to education and skills.
- 6.2.8. The Vision seeks to deliver a vibrant and regenerated town centre with a mix of retail, leisure, residential and visitor uses to ensure long-term vitality and viability. Protecting and enhancing tourist attractions and heritage assets is central to this ambition. The Vision explicitly recognises heritage assets as key to Tamworth's unique identity and sense of place, and as a tangible reminder of its rich and significant past. These elements support positive effects for cultural heritage, townscape quality and efficient use of land through town centre regeneration and town centre living.
- 6.2.9. The Vision places strong emphasis on adapting to and mitigating climate change. It encourages sustainably located and climate-resilient development for both new buildings and the modification of existing buildings, and commits to working with partners to reduce the risk and impact of flooding. The Vision also seeks to reduce the need to travel by private vehicle and promote walking, cycling and improved public transport, supporting sustainable travel.
- 6.2.10. The Vision aims to achieve a balance between growth and protection of the natural environment, with opportunities taken to improve biodiversity and support nature's recovery. It commits to maintaining and, where appropriate, improving access to good-quality open space, blue and green infrastructure. The extent of effects on the natural environment will predominantly depend on how opportunities are realised through the local plan, although any potential adverse impacts would likely be capable of being mitigated by the policies of the local plan.

- 6.2.11. The Vision promotes healthier, more active lifestyles through access to open space, leisure opportunities and sustainable travel. These ambitions support positive effects for physical and mental health, as well as accessibility. Commitments to healthy, sustainable, safe and inclusive communities also reinforce positive effects for community cohesion and quality of life.
- 6.2.12. High-quality, locally distinctive design is a core part of the Vision. This supports positive effects for townscape and local character. The Vision also commits to ensuring new development is supported by appropriate infrastructure, including digital infrastructure, which contributes positively to economic competitiveness and community wellbeing.
- 6.2.13. Improved public transport links to the town centre, employment areas and destinations outside Tamworth are expected to generate positive effects for sustainable travel and accessibility. Reduced reliance on private vehicles also contributes to improved air quality, although the scale of change is uncertain at Vision level.
- 6.2.14. Overall, the Vision is expected to generate broadly positive effects across the SA Objectives, reflecting its clear focus on meeting local needs, supporting a balanced approach to growth and strengthening the quality of places and communities. Some uncertainties remain for environmental objectives, which is inherent at the Vision stage where the specific locations, mechanisms and standards for delivery are not yet defined. These uncertainties are appropriately addressed through the detailed policies and spatial choices set out in the local plan.

Strategic Objective 1: Make the most efficient and sustainable use of the borough's limited supply of land

- 6.2.15. TBLP Objective 1 seeks to make the most efficient and sustainable use of the borough's limited supply of land, with a likely positive effect on safeguarding finite land resources and supporting more sustainable patterns of development. By promoting a more effective use of available sites, the objective is also anticipated to contribute positively to accessibility, sustainable travel, soil quality and climate mitigation. While Objective 1 introduces some inherent tensions due to the borough's limited land supply, these can be effectively managed through the emerging policy framework, and the objective is expected to make a broadly positive contribution to sustainable development.

Strategic Objective 2: Provide a supply of high quality and affordable homes to meet the diverse needs of our community.

- 6.2.16. Objective 2 has a mixed performance overall against the SA Framework, with its focus on delivering high-quality homes expected to generate significant benefits for housing provision and associated improvements in health and wellbeing. Some inherent tensions arise in a compact urban borough, particularly in relation to land availability for other uses, although these predominantly reflect spatial constraints as opposed to fundamental incompatibilities with SA objectives. Many effects remain uncertain at this stage because outcomes will depend on how the objective is implemented, including the location and design of new housing. Any potential

negative effects can be effectively managed through the spatial strategy and supporting policies, which have been informed by a robust evidence base.

Strategic Objective 3: Support the existing local economy whilst being flexible enough to respond positively to new economic opportunities.

- 6.2.17. Objective 3 supports a positive and responsive approach to the economy and growth, helping to build a more diverse, resilient and competitive economic base for Tamworth. Strengthening local economic capacity is expected to enhance prosperity, improve access to opportunities and contribute to wider social wellbeing. While some effects remain uncertain at this stage, reflecting the unknown scale, nature and location of future economic activity, no significant compatibility issues are identified. Objective 3 aligns broadly with the SA Framework.

Strategic Objective 4: Regenerate and diversify the town centre to create a thriving destination and vibrant evening economy.

- 6.2.18. Objective 4 is broadly compatible with the sustainability objectives, with several clear positive synergies. It aligns strongly with economic, social and townscape-related objectives, offering clear opportunities to positively affect the local economy, employment, health, quality of life, and character of the built environment. Although its compatibility with several environmental objectives is more mixed, the potential to increase emissions, traffic and pollution could be minimised by prioritising sustainable transport connectivity and improving public transport availability. There is a potential conflict between redevelopment and the historic core, but this could be appropriately mitigated through policy.

Strategic Objective 5: Protect and enhance the borough's heritage including through facilitating appropriate and sustainable reuse of heritage assets.

- 6.2.19. Objective 5 is broadly compatible with the sustainability objectives. Its strong focus on conserving and enhancing heritage assets aligns well with objectives relating to the historic environment, environmental quality, landscape and townscape quality and efficient land use, resulting in a clear cluster of positive relationships. A small number of objectives show mixed or uncertain links, largely where heritage considerations may influence the scope of development or limit potential for climate adaptation. These anticipated uncertainties largely depend on implementation and can be managed through supporting local plan policies. Overall, TBLP Objective 5 sits comfortably within the SA Framework and does not present any notable compatibility issues.

Strategic Objective 6: Tackle the causes and adapt to the effects of climate change.

- 6.2.20. Objective 6 is broadly compatible with the sustainability objectives, although several show no direct relationship. The objective provides a clear strategic aim to mitigate the causes of climate change and adapt to its effects, with a cluster of likely significant positive effects anticipated in relation to air quality, sustainable travel behaviours, flood risk, waste management, biodiversity, health, and the historic environment. Overall, TBLP Objective 6 is expected to generate predominantly positive and mutually reinforcing outcomes across the SA Framework, with

particularly strong alignment to environmental objectives. No notable compatibility issues are identified, and the objective is well-placed to support longer-term sustainability benefits.

Strategic Objective 7: Protect and enhance ecological and biodiversity assets.

- 6.2.21. Objective 7 is broadly compatible with the sustainability objectives, particularly those relating to biodiversity, environmental quality, climate resilience, and landscape character. Its emphasis on protecting and enhancing ecological value supports improved habitats, reduced pollution, and stronger natural systems, with wider benefits for health and wellbeing. There is some uncertainty in relation to housing delivery, as safeguarding sensitive ecological assets may limit development potential in certain locations. However, in a predominately urban borough, any constraints are anticipated to be likely limited and can be managed through supporting policies. Overall, Objective 7 aligns well with the SA Framework and does not present any significant compatibility issues.

Strategic Objective 8: Deliver sustainable neighbourhoods through the provision, protection and enhancement of local services and facilities.

- 6.2.22. Objective 8 is broadly compatible with the sustainability objectives. Strengthening local services supports better access to facilities, healthier lifestyles, and stronger neighbourhood cohesion, with associated positive effects on quality of life and more sustainable travel behaviour. All remaining sustainability objectives were appraised as having a neutral effect. Overall, Objective 8 aligns well with the SA Framework and does not present any compatibility issues.

Strategic Objective 9: Foster a more inclusive and connected community where individuals from all backgrounds feel valued, heard and supported.

- 6.2.23. Objective 9 was introduced in response to social unrest and rioting in Tamworth, which highlighted the importance of strengthening community cohesion across the borough. As an objective seeking to address a specific concern, it has no direct relationship with the majority of sustainability objectives. However, its focus on social outcomes aligns positively with the sustainability objectives that seek better health and quality of life. Although significant positive synergies are limited to socially orientated objectives, TBLP Objective 9 is not anticipated to present any compatibility issues with the wider sustainability appraisal framework.

Strategic Objective 10: Encourage active and healthier lifestyles including by providing accessible and better connected green and blue linkages and open spaces, as well as formal indoor and outdoor recreation facilities.

- 6.2.24. Objective 10 demonstrates broad compatibility with the sustainability objectives. The objective promotes active and healthier lifestyles by providing access to green and blue linkages, open spaces, and a range of recreation facilities. This strongly aligns with objectives concerning health and wellbeing, quality of places and accessibility. The objective has a cluster of further positive effects relating to sustainable travel, air quality, carbon emissions and ecological networks. The impact on soil and water quality is anticipated to have a mixed effect, although the negative aspect of this

could be minimised through policy. Overall, Objective 10 aligns well with the SA Framework and it does not present any significant compatibility issues.

Strategic Objective 11: Promote sustainable transport modes for all journeys through improving walking, cycling, public transport and electric vehicle facilities.

- 6.2.25. Objective 11 demonstrates broad compatibility with the sustainability objectives, although several objectives have no direct relationship. The objective promotes long-term positive outcomes by supporting a modal shift towards more sustainable forms of transport. This strongly aligns with objectives concerning sustainable travel, accessibility, health, climate change mitigation, and the reduction of pollution, creating a clear cluster of positive interactions. One sustainability objective presents an element of uncertainty, acknowledging that new or existing infrastructure may risk habitat loss or fragmentation. The extent of this impact is highly dependent on route alignment and scheme design and can be effectively managed through policy. Overall, Objective 11 is anticipated to be effective in delivering significant environmental benefits and does not present any notable compatibility concerns.

Strategic Objective 12: Ensure that appropriate infrastructure is in place to support development across the borough including digital infrastructure.

- 6.2.26. Objective 12 is broadly compatible with the sustainability objectives. Its strong focus on delivering appropriate and timely infrastructure aligns well with objectives relating to the economic development, employment opportunities, accessibility, and housing, resulting in a clear cluster of significant positive relationships. The objective has a collection of further positive, yet slightly more indirect, effects relating to sustainable travel and efficient use of land. A number of sustainability objectives give rise to potentially mixed or uncertain effects, as the influence of TBLP Objective 12 is highly dependent on the type, design and location of the infrastructure delivered. It is likely that many of the potential effects can be effectively dealt with through the mechanisms of the plan when specific schemes come forward, and any effects will need to be considered at a more detailed stage. Overall, Objective 12 presents no significant compatibility concerns.

Conclusion

- 6.2.27. The Vision and Strategic Objectives provide a clear and positive foundation for the emerging local plan, setting an integrated direction that responds to local needs, supports balanced growth and strengthens the quality of places and communities. The appraisal identifies wide-ranging beneficial relationships across the SA Framework, particularly for climate mitigation and adaptation, biodiversity, flood risk, health, accessibility, heritage, townscape and the efficient use of land.
- 6.2.28. Some inherent tensions arise from accommodating growth within a compact and constrained borough, where limited land supply creates competition between land uses and the introduction of new development heightens sensitivities for objectives such as economic growth, carbon emissions, flood risk, efficient use of land, and in specific locations, the historic environment. These tensions and uncertainties are inherent in the context, and while some adverse effects may arise, they can be moderated to a degree through the spatial strategy and detailed policies appraised

later in this report. A number of uncertainties also remain where outcomes depend on the scale, type, design and location of development to be defined through the spatial strategy and policies.

6.3. Policy Assessments

- 6.3.1. Following comments received during the Regulation 18 consultations and the recommendations set out in the Interim SA Report (2026), the Council have prepared the policies of the Pre-Submission Local Plan. Full details of the comments received at previous stages of SA are provided in Appendix B, and the recommendations made through the SA to inform the development of the current policies are set out in Appendix E.
- 6.3.2. The Pre-Submission Local Plan contains 63 policies, including 9 strategic policies that establish the overarching direction for growth and development in Tamworth. The policies are listed in Table 2.3 in Chapter 2. A summary of the policy assessments is presented below in Table 6.2, with the full appraisal matrices presented in Appendix F.
- 6.3.3. The policies have been assessed in accordance with the methodology set out in Chapter 4. As part of the consideration of likely effects, the detailed assessments in Appendix F examine the temporal scale, permanence and geographic extent of each policy's effects, and identify any mitigation requirements or opportunities for enhancement where appropriate.

Table 6.2: Summary of SA Assessments for Regulation 19 Pre-Submission Local Plan Policies

Policy	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14	SAO15	SAO16	SAO17
SP1	++	++	++	+	+	+	++	-/?	?	?	?	0	?	?	?	+/-	-/?
SP2	0	0	0	++	++	0	+	+	0	++	++	+	++	0	0	+	+
SP3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SP4	0	0	++	+	0	++	+	-/?	+/-	0	?	+/-	-	+/-	+/-	+/-	-/?
HO1	0	+	+	+	0	++	0	0	0	0	0	0	0	0	0	+	0
HO2	0	0	+	0	0	+	+	?	0	0	0	0	0	0	?	+	0
HO3	0	0	0	0	+	++	0	0	0	0	0	0	0	0	0	0	0
HO4	0	0	+	++	+	++	+	0	0	0	0	0	0	0	+	0	0
HO5	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	0	+
SP5	+	+	0	0	0	0	?	-/?	-	0	-/?	-	-	0	-	-	-/?
EM1	++	++	+	0	0	0	+	0	0	0	0	0	0	0	0	+	0
EM2	+	+	+	+	0	0	+	0	0	0	0	0	0	0	0	0	0
EM3	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EM4	++	++	+	+	+	0	+	+	+	0	0	0	+	++	+	+	+
SP6	+	+	+	+	+	0	+	+/?	0	+	0	0	0	+/-	+	+	+
TC1	++	+	++	+	+	0	+	0	0	0	0	0	0	+/-	+	+	0
TC2	++	+	++	+	+	+	+	0	0	0	0	0	0	+/-	+	+	0
TC3	++	+	+	+	++	++	+	0	0	0	0	0	0	+/-	++	++	0
TC4	++	+	+	+	++	++	+	0	0	0	0	0	0	+/?	++	++	0
TC5	++	+	+	+	+	0	+	+/-	0	+/-	0	0	0	0	+	+	0

Policy	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14	SAO15	SAO16	SAO17
TC6	+	+	++	+	++	0	++	+	0	+	0	0	0	0	0	0	0
HC1	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
HC2	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
HC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0	0	0
HC4	0	0	+	+	+	0	+	0	0	0	0	0	0	0	+	0	0
HC5	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	0	0
HC6	0	0	+	++	+	0	+	0	0	0	0	0	0	0	+	0	0
HC7	0	0	+	++	+	0	+	0	0	0	0	0	+	0	0	0	0
HC8	0	0	++	++	0	0	++	?	?	0	0	+	+	++	0	0	0
HC9	0	0	+	++	++	0	+	0	0	+	0	0	0	0	++	0	0
HC10	0	0	0	+	+	0	0	0	0	0	0	0	+	+	+	0	0
HC11	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0
SP7	0	0	0	0	+	0	0	0	0	0	0	0	0	++	+	+	+
HE1	0	0	0	0	+	0	0	0	0	+	0	0	0	++	+	+	+
HE2	0	0	0	0	+	0	0	0	0	0	0	0	0	+	+	0	0
HE3	0	0	0	0	+	0	0	0	0	0	0	0	0	++	+	0	0
SP8	0	0	+	++	++	0	+	0	0	0	+	0	+	+	++	+	0
DE1	0	0	+	+	++	0	0	0	0	0	+	0	0	++	++	+	0
DE2	0	0	+	0	+	0	+	0	0	0	+	0	+	0	++	+	0
DE3	0	0	0	+	+	+	0	0	0	+	0	0	0	0	+	+	0
DE4	0	0	+	+	+	+	0	0	0	0	0	0	0	0	+	+	0
DE5	0	0	0	+	+	+	0	0	0	0	0	0	0	0	+	0	0

Policy	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9	SAO10	SAO11	SAO12	SAO13	SAO14	SAO15	SAO16	SAO17
DE6	0	0	+	+	+	0	0	+	0	0	0	0	0	0	+	+	0
DE7	0	0	+	+	+	0	0	0	0	0	0	0	0	+	+	0	0
DE8	0	0	+	0	+	0	0	+	0	0	0	0	0	+	+	0	0
FL1	0	0	0	+	++	0	0	0	+	0	++	++	0	0	0	0	0
FL2	0	0	0	+	++	0	0	0	0	0	++	++	0	0	0	0	0
FL3	0	0	+	+	0	0	0	0	++	0	+	+	+	0	+	0	0
FL4	0	0	+/?	+/?	++	0	0	0	+/?	0	++	++	+/?	0	+/?	0	0
NE1	0	0	+	++	++	0	++	+	+	+	+	+	++	0	+	0	0
NE2	0	0	0	+	+	0	0	+	+	0	0	0	++	0	+	0	0
NE3	0	0	0	0	0	0	0	0	0	0	0	0	++	0	+	0	0
NE4	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0
NE5	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0
NE6	0	0	0	+	+	0	0	+	0	+	+	+	++	0	+	0	0
EP1	0	0	0	++	++	0	0	++	+	0	0	0	0	0	+	0	0
EP2	0	0	0	++	+	0	0	0	++	0	0	0	0	0	0	+	0
EP3	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	+	0
SP9	0	0	++	++	++	0	++	+	0	++	0	0	0	0	0	0	0
TA1	0	0	0	+	+	0	++	+	0	+	0	0	0	0	+	0	0
TA2	0	0	+	+	++	0	+	0	0	0	0	0	0	0	0	0	0
TA3	+	0	0	+	+	0	+	+	0	+	0	0	0	0	+	0	0
IO1	+	0	+	+	+	+	0	0	0	0	+	0	0	0	0	0	0
IO2	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0

Summary of Likely Effects

- 6.3.4. The appraisal indicates that the policies within the Pre-Submission Local Plan generally perform well against the Sustainability Appraisal Framework, with most policies contributing positively to Tamworth's environmental, social and economic objectives. While not all policies interact meaningfully with every sustainability objective, overall policy performance is positive and aligned with the principles of sustainable development. For the majority of policies, the assessment has identified negligible, minor positive or major positive effects.
- 6.3.5. A considerable number of policies generate negligible effects. This occurs where a policy is not anticipated to exert a meaningful influence on a particular sustainability objective, reflecting the breadth of thematic and development management matters addressed, many of which do not correspond directly with every SA Objective.
- 6.3.6. Several policies generate only a limited range of likely effects. These effects are typically focused in nature and interact with only a small subset of SA Objectives, although performance is generally positive and aligned with the aims of the applicable objectives.
- 6.3.7. Policies that enable or direct development, particularly those relating to the spatial strategy, housing, employment and infrastructure, generate a broader range of likely effects. These policies are likely to also give rise to minor negative impacts on objectives like waste, emissions and pollution, reflecting the fact that growth and development proposed in the local plan inevitably give rise to unavoidable environmental pressures. Many of these effects are capable of being appropriately managed through the policies of the TBLP. The policy requirements have the ability to ensure these developments create some positive impacts or reduce the potential adverse effects if designed and carried out appropriately.
- 6.3.8. A small number of uncertain effects are identified across the policies. This primarily arises from inherent uncertainty regarding the location, scale and design of future development. Therefore, there is some uncertainty against several SA Objectives as to whether the proposed development would lead to positive or adverse effects overall. These details would only be determined at the planning application stage and as such, many of the uncertain effects are capable of being appropriately managed through the policies of the TBLP.
- 6.3.9. The range in potential impacts for these policies owes to the fact that large developments could have significant adverse effects, however, the policy requirements have the ability to ensure these developments create some positive impacts or reduce the potential adverse effects if designed and carried out appropriately.
- 6.3.10. Overall, no significant adverse effects have been identified, and the policies collectively support a balanced and sustainable pattern of growth across the borough.

6.4. Site Assessments

- 6.4.1. The Pre-Submission Local Plan proposes 18 residential allocations and 1 employment allocation. These are set out in Table 6.3.

Table 6.3: Proposed Site Allocations in the Pre-Submission Local Plan

Site Ref.	Pre-Submission Local Plan Allocation Name	Allocation Type	Indicative Capacity
23/584	459 Watling Street and Adjacent Land	Housing	7
18/009	Millfield House, Lichfield Road	Housing	11
18/001	Norris Bros Garage, Lichfield Street	Housing	20
18/013	Ashlands Farm, Ashby Road	Housing	177
18/030	Land North of Hedging Lane (Central Hydraulics)	Housing	25
18/004	Land East of Dunstall Park Primary School	Housing	10
18/018	Arriva Bus Depot, Aldergate	Housing	40
22/091	Land Fronting Windmill Farm, Coton Lane	Housing	43
22/095	Land North of Moor Lane	Housing	61
23/573	Marmion House, Lichfield Street	Housing	68
22/096	Land Opposite Mariner, Coton Lane	Housing	90
23/515	Former Tamworth College Site, Croft Street	Housing	123
23/585	Land Between Dunstall Land and Coventry Canal	Housing	166
22/094	Land South of Ashby Road	Housing	200
18/033	Former Co-Op Filling Station, Bonehill Road	Housing	9
20/090	Land at Gorsy Bank Road	Housing	245
18/007	Land off Wigford Road	Housing	611
18/028	Treetops Garage, Dosthill	Housing	14
24/591	Land South of the A5	Employment	9.8ha

- 6.4.2. Together, the residential sites provide an indicative capacity of 1,920 dwellings across a mix of brownfield, greenfield and Green Belt land. Of this total, sites delivering 1,064 dwellings lie outside the Green Belt, while sites delivering 856 dwellings lie within the Green Belt. The employment allocation is expected to deliver 9.8ha of employment land.

- 6.4.3. All sites have been appraised in accordance with the methodology set out in Chapter 4. The appraisal assumptions used to inform decision-making are provided in Appendix G, alongside the detailed assessment matrices for each site.
- 6.4.4. Table 6.4 summarises the likely effects of each proposed allocation, with accompanying commentary structured by SA Objective.

Table 6.4: Summary of Likely Effects for Proposed Site Allocations

Site	SAO1	SAO2	SAO3	SAO4	SAO5	SAO6	SAO7	SAO8	SAO9 (i)	SAO9 (ii)	SAO10	SAO11	SAO12	SAO13	SAO14	SAO15	SAO16 (i)	SAO16 (ii)	SAO16 (iii)	SAO17
23/584	-	0	+/-	+/-	0	+	+/-	0	0	+/?	0	0	0	0/?	0	0/?	++	+	-/?	0
18/009	-	0	++	++	0	++	++	0	-/?	+/?	0	0	--	-/?	0	+/?	++	+	-/?	0
18/001	-	0	++	++	0	++	++	0	0	+/?	0	0	0	0/?	+/-	+/?	++	+	-/?	0
18/013	-/?	0	--	+/-	0	++	-	0	-/?	0	0	0	0	-/?	-/?	--	--	-	-/?	0
18/030	-	0	++	++	0	++	++	0	0	+/?	0	0	0	-/?	0	0/?	++	+	-/?	0
18/004	0	0	++	++	0	++	+	0	-/?	0	0	0	--	--/?	0	0	--	0	-/?	0
18/018	0/?	0	++	+	0	++	+/?	0	0	+/?	0	0	0	0/?	+/-	++/?	++	+	-/?	0
22/091	-/?	0	++	+	0	++	++	0	0	0	0	0	0	-/?	0	-	--/?	-	0	0
22/095	0	0	+	++	0	++	+	0	-/?	0	0	0	0	-/?	-/?	--	--	-	-/?	0
23/573	-/?	0	++	++	0	++	++	0	0	0/?	0	0	0	0/?	-/+	+/?	++	+	-/?	0
22/096	0	0	++	+	0	++	+	0	-/?	0	0	0	--	-/?	0	-	--/?	-	-/?	0
23/515	0	0	++	++/-	0	++	++	0	0	0/?	0	0	0	-/?	0	0/?	+	+	-/?	0
23/585	0	0	--	+/-	0	++	+/-	0	-/?	0	0	0	0	-/?	-/?	--	--	-	-/?	0
22/094	-/?	0	-/?	+/-	0	++	-	0	-/?	0	0	0	0	-/?	-/?	--	--	-	-/?	0
18/033	0	0	++	++	0	++	++	0	-/?	+/?	0	0	-	0/?	-/+	+/?	++	0	-/?	0
20/090	-/?	0	-	+/-	0	++	+/-	0	0	0	0	0	0	-/?	-/?	--	--	-	0/?	0
18/007	-/?	0	++	++/-	0	++	++	0	-/?	0	0	0	0	--/?	-/?	--	--	0	-/?	0
18/028	-	0	++	++	0	++	++	0	0/?	+/?	0	0	--	0/?	0	+/?	++	+	-/?	0
24/591	++	0	-	++	0	0	-	0	-/?	0	0	0	-	--/?	0	0	--/?	-	-/?	0

Summary of Likely Effects

SAO1 Economy

- 6.4.5. Most allocations considered at this stage are for residential development. A third of these are assessed as likely to have a negligible effect on SAO1, as their current uses are not employment-generating and redevelopment would therefore not result in the loss of existing economic activity.
- 6.4.6. A number of residential site allocations may adversely affect SAO1 through the loss of existing employment uses, with most scoring minor negative effects due to the displacement of businesses. One site contains an active business that would require relocation and the economic implications of this are not yet known.
- 6.4.7. Several residential site allocations are understood to be in agricultural use. These greenfield sites on the edge of Tamworth are assessed as having minor negative but uncertain effects, reflecting ambiguity over the extent of current agricultural activity and therefore the scale of potential economic loss.
- 6.4.8. The single employment site allocation is anticipated to have positive effects on SAO1, reflecting the economic benefits associated with new employment-generating development.

SAO2 Employment

- 6.4.9. SAO2 has been screened out of the assessment at this stage. It is assumed that all employment site allocations have the potential to generate new employment opportunities by virtue of their proposed use. However, in the absence of detailed proposals, the nature and value of these opportunities cannot be meaningfully differentiated at this stage of the assessment. For residential site allocations, the location of development is not expected to materially influence the quantity and quality of employment opportunities. Accordingly, the effects of all of the site allocations on this SA objective have been assessed as negligible (0).

SAO3 Accessibility

- 6.4.10. The borough's compact and predominantly urban character means that a majority of site allocations are assessed as performing positively against SAO3.
- 6.4.11. Of the 18 housing site allocations, two thirds are assessed as likely to have major positive effects on accessibility. These higher-performing sites are largely located in Tamworth town centre or within reasonable walking distance of it, reflecting the strong accessibility benefits associated with concentrated services, facilities and employment opportunities. Several other sites benefit from close proximity to supporting local centres, which provide good levels of localised provision across much of the borough.
- 6.4.12. A small number of housing sites are likely to have mixed effects on accessibility. This reflects those that are located further away from higher-order centres, but benefit from more dispersed access to localised provision, such as around Watling Street in

Wilnecote. It also reflects otherwise disconnected sites where extant permission includes on-site provision of services, which moderates accessibility effects.

- 6.4.13. Minor negative effects arise where sites are theoretically well-located but physical constraints and barriers limit the level of accessibility that can be realistically achieved. More broadly, the borough is subject to several significant physical constraints, including two railway lines, three major waterways (two of which converge in the borough), a major highway running through the centre, and extensive areas of floodplain. Some sites are more affected by these constraints than others, and in certain cases these features prevent reasonable and convenient levels of accessibility. For the sites assessed, this relates to the one employment allocation.
- 6.4.14. A range of both minor and major negative effects are anticipated where sites are relatively disconnected from existing built-up areas and clusters of service provision. These locations are typically characterised by their peripheral positions, with separation from the existing built-up area likely to result in greater reliance on the private car to access essential services. Spatially, these sites are concentrated around the northern, southern and western edges of the borough. In some cases, there may be potential to provide on-site services, which could help to minimise negative effects, but would not fully mitigate them.

SAO4 Health

- 6.4.15. The majority of residential site allocations performed positively in relation to supporting healthier and more active lifestyles. These sites typically benefit from strong connectivity to the borough's active travel network, including the PRow network, cycle routes and blue infrastructure, alongside convenient access to open space or sport and recreation facilities. This combination of attributes is expected to encourage participation in outdoor recreation and, where appropriate, active travel for everyday journeys. Sites performing most strongly were those that also benefit from good access to healthcare facilities. These sites are generally located within or close to the town centre or local centres, but some are also those that benefit from more dispersed healthcare provision.
- 6.4.16. Mixed effects were predominantly linked to a small number of sites where contrasting influences on health and wellbeing were present. This included sites 18/007 and 23/515 where redevelopment may result in the irreversible loss of health-promoting infrastructure, such as designated open space and sports facilities. Mixed effects were also anticipated for the majority of sites located around the edges of Tamworth, owing to their peripheral locations, which may limit access to existing facilities, spaces or networks and increase the likelihood of negative health impacts associated with greater car dependency. The appraisal identified clear geographic clusters where these patterns were evident, including sites around Ashby Road to the north, the Green Belt sites to the south and a single site located on the western boundary.
- 6.4.17. If a number of residential sites are allocated in close proximity to one another, this could lead to existing healthcare facilities experiencing capacity pressures. However, it is also recognised that new development could provide the critical mass needed to

support the provision of new healthcare facilities, but this cannot be assumed at this stage.

SAO5 Quality of Life

- 6.4.18. SAO5 has been screened out of the assessment at this stage. The effects of all site allocations on safety and community cohesion will largely be determined by detailed proposals, including the arrangement and design of buildings, public realm and open spaces. The perception of safety, particularly at night, will additionally be influenced by lighting. These measures will be addressed at the planning application stage and do not form part of this assessment. Accordingly, the effects of all the site allocations on this SA objective will be assessed as negligible (0). The proximity of site allocations to services and facilities may help to address issues of social interaction and community cohesion. However, these issues are considered under SAO3 and SAO4.

SAO6 Housing

- 6.4.19. All residential site allocations are expected to have positive effects in relation to SAO6, reflecting their role in contributing to the borough's housing supply. All but two of these sites are larger sites (with a capacity of more than ten dwellings) and so would provide opportunities for the development of a larger number of homes, including affordable dwellings, resulting in a significant positive effect. The mix of housing types and tenures will be determined through the emerging TBLP rather than by the location of individual sites.
- 6.4.20. The employment allocation is not intended to provide housing, and its location is not expected to influence the achievement of this objective. As such, the employment site allocation is assessed as having a negligible effect.

SAO7 Sustainable Travel

- 6.4.21. Tamworth's compact urban form means that many residential allocations are located within reasonable proximity to key services, public transport routes and established walking and cycle networks. As a result, around two thirds of residential allocations are assessed as likely to have positive effects on SAO7, with the majority achieving a major positive effect. These sites are generally situated within or close to the town centre, local centres or established urban areas, where good access to sustainable travel allocations provide strong potential to support active and low-carbon modes.
- 6.4.22. Although the majority of allocations perform strongly against this objective, several residential site allocations located on the edge of the urban area are assessed as likely to have negative effects, reflecting their distance from key services and more limited access to public transport and active travel infrastructure. These negative effects are largely contained to the Ashby Road locality, where existing congestion and constrained sustainable travel provision mean that further development is likely to exacerbate the problem. As such, this could detract significantly from sustainable travel objectives without targeted and strategic-scale mitigation. The employment allocation is also identified as likely to score a minor negative effect.

SAO8 Air, Light and Noise Pollution

- 6.4.23. SAO8 has been screened out of the assessment at this stage. The impact of a site allocation on light and noise pollution will depend largely on the design and layout of any scheme that comes forward, which it is not possible to assess at this stage. In respect of air quality, Tamworth does not have any Air Quality Management Areas (AQMAs). It is assumed that development proposals would result in an increase in traffic and thus traffic-related air pollution. Both existing and future site end users would be exposed to this change in air quality, and this is likely to contribute towards cumulative effects on air quality. At this stage of the assessment, it is uncertain the extent to which each site allocation could potentially increase air pollution in the immediate wider area, particularly as a result of transport-related pollutants. Effects on sustainable transport use are considered separately under SA objective 7. On account of the above, all sites will have a negligible (0) impact on this objective.

SAO9 Soils and Water Pollution (Watercourses and Water Quality)

- 6.4.24. Tamworth contains an extensive network of watercourses, including the Rivers Tame and Anker, the Coventry Canal and a number of smaller streams and waterbodies. While the borough contains no Source Protection Zones (SPZs), the presence and distribution of these watercourses remain a key consideration in assessing the likely effects on water quality and the wider water environment under SAO9.
- 6.4.25. The extensive distribution of watercourses across the borough is reflected in the appraisal findings, with just over half of the allocations anticipated to have a minor but uncertain negative effect on SAO9 (i). These effects arise where a site contains a watercourse, lies immediately adjacent to one, or is located in close proximity without intervening barriers. This pattern occurs across residential and employment allocations, with its spatial distribution corresponding closely with the alignment of the borough's river and canal network.
- 6.4.26. Two residential site allocations (18/007 and 22/096) contain minor watercourses within their boundaries. A further seven site allocations, comprising eleven residential sites and the single employment site allocation, directly adjoin a major watercourse. Three residential site allocations (18/007, 18/009 and 18/033) are located adjacent to the River Tame. Two site allocations are positioned adjacent to the River Anker, which are both clustered to the south of Ashby Road (18/013 and 22/094). Two additional site allocations adjoin the Coventry Canal, consisting of one residential site allocation (23/585) and the employment site allocation (24/591). Two further residential site allocations (18/004 and 22/095) do not directly adjoin a watercourse, but their close proximity and the absence of intervening barriers increase the potential for adverse effects.
- 6.4.27. Although the potential for adverse effects on water quality has been identified, such risks are generally capable of being mitigated through appropriate design and construction measures. More broadly, the identification of these potential negative effects signals the need for further site-specific investigation to confirm baseline conditions and determine the likelihood and significance of any impacts.
- 6.4.28. One residential allocation is assessed as likely to have a negligible, though still uncertain, effect. Although this site falls within 200m of a watercourse, its context provides a degree of physical separation, for example through major infrastructure or

intervening urban development, which is expected to limit the potential for adverse effects on water quality. Further work will be required to confirm whether this effect can be considered negligible with confidence.

- 6.4.29. Eight residential allocations are not located within 200m of a watercourse and are therefore not anticipated to give rise to any likely effects.

SAO9 Soils and Water Pollution (Ground Conditions and Soils)

- 6.4.30. Across the residential site allocations, seven are expected to have a positive yet uncertain effect on ground conditions. These are predominantly brownfield sites where previous uses may have given rise to contamination that redevelopment could help to remediate, although the exact baseline remains unknown at this stage.
- 6.4.31. A further two residential allocations are assessed as having a negligible yet uncertain effect. These are also brownfield, but their existing or former uses are not considered likely to present contamination risks, and therefore opportunities for remediation are limited. Additional work will be required to remove uncertainty.
- 6.4.32. For nine residential greenfield sites, no likely significant effects are anticipated. Given their current undeveloped nature, the potential for contamination and associated remediation opportunities is considered low, although baseline conditions still need to be confirmed.
- 6.4.33. The employment site allocation is greenfield and is therefore assessed as having a negligible effect.
- 6.4.34. Potential adverse impacts associated with the loss of agricultural soils are addressed separately under SAO16.

SAO10 Minimising Contributions to Climate Change

- 6.4.35. SAO10 was scoped out of the appraisal of residential and employment allocations. Whilst new development will inevitably lead to an increase in greenhouse gas emissions, the location of individual site allocations will not have a direct effect on the causes of climate change. Instead, effects will largely depend on the detailed proposals for sites, including their construction and design, which would be influenced by policies in the emerging TBLP and details submitted at the planning application stage. The extent to which the location of site allocations would facilitate the use of sustainable modes of transport in place of cars is considered separately under SAO7. The likely effects of all site allocations on this objective are therefore negligible (0).

SAO11 Adaptation to Climate Change

- 6.4.36. SAO11 was scoped out of the appraisal of residential and employment allocations. The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the emerging TBLP and details submitted at the planning application stage. The effects of site allocations on flood risk in the borough

is considered separately under SAO12. The likely effects of all site allocations on this objective are therefore negligible (0).

SAO12 Flood Risk

- 6.4.37. Flood risk within Tamworth is primarily concentrated along the River Tame and the River Anker, with parts of the borough historically experiencing severe flooding events. Extensive floodplains associated with the River Tame affect large areas along the borough's western boundary, while a more linear corridor of risk around Amington is linked to the River Anker. Additional, smaller pockets of flood risk occur along Kettle Brook.
- 6.4.38. Around a third of residential allocations, together with the single employment allocation, lie within Flood Zones 2 and/or 3 and are therefore subject to higher flood risk (22/096, 18/028, 18/004, 18/033 and 24/591). These sites are assessed as having negative effects on SAO12, with all but one scoring a major negative. The employment site (24/591) scores a minor negative, reflecting the lower vulnerability of the proposed use.
- 6.4.39. The remaining 13 residential site allocations are located predominantly in town centre or suburban locations, as well as the northern and southern edges of the borough. These sites fall entirely or largely within Flood Zone 1 and are therefore considered to be at low risk of flooding. Accordingly, these are assessed as having a negligible effect on SAO12.

SAO13 Biodiversity

- 6.4.40. The borough contains a diverse range of designated ecological and geological sites, including one Site of Special Scientific Interest (SSSI), 16 Sites of County Biological Importance (SBI), seven Local Nature Reserves (LNR), six Biodiversity Alert Sites (BAS) and one Local Geological/Geomorphological Site (LoGS). These designations are widely distributed across the borough, meaning that most potential development sites are likely to be located in close proximity to at least one.
- 6.4.41. The effects of all site allocations on SAO13 are varied. Given the extent and distribution of biodiversity assets across the borough, many site allocations have the potential to give rise to negative effects. However, while proximity to designated sites provides an initial indication of potential adverse impacts, there remains a degree of uncertainty, as appropriate mitigation could avoid harm and may even deliver beneficial outcomes. The presence and sensitivity of on-site biodiversity cannot be determined at this strategic level and would need to be assessed once detailed proposals are brought forward through the planning application process.

SAO14 Historic Environment

- 6.4.42. Tamworth contains a wide range of designated heritage assets, comprising 140 listed buildings and three Scheduled Monuments. The majority of these assets, including all Scheduled Monuments, are located within Tamworth town centre, which forms the borough's historic core. This area is largely covered by a conservation area, with a further six conservation areas situated elsewhere in the borough. Outside the town centre, designated heritage assets are primarily concentrated

within these conservation areas, although some are more dispersed across the wider area.

- 6.4.43. Several residential site allocations lie within or near to the town centre and therefore have the potential to affect heritage significance, including the character and appearance of the Town Centre Conservation Area and the settings of nearby designated assets. These are assessed as likely to give rise to mixed effects on SAO14. This reflects both the risks that redevelopment could pose to the significance and setting of the surrounding historic environment, and the opportunities it may offer to enhance sites that currently detract from the historic townscape or provide poor visual integration.
- 6.4.44. Just under half of all residential site allocations are not located in close proximity to designated heritage assets or within any of the borough's conservation areas. These sites are therefore assessed as likely to have negligible effects on SAO14. The employment site allocation is also assessed as likely to have neutral effects.
- 6.4.45. Several residential site allocations are assessed as having likely negative but uncertain effects on SAO14. These predominantly relate to greenfield sites located within the limited remaining expanses of open land to the north and south of Tamworth. These areas contribute to the setting of the borough's more rural conservation areas and their assets, including those around Amington and Dosthill. Development in these locations is likely to result in permanent changes to heritage settings due to the openness of the landscape, which provides little screening and creates strong visual connectivity with nearby conservation areas.

SAO15 Landscape and Townscape

- 6.4.46. A third of residential site allocations are assessed as having the potential for positive but uncertain effects on SAO15. These are predominantly brownfield sites that currently detract from the surrounding townscape due to poor condition, low visual quality, or weak integration with the existing streetscape. Redevelopment offers opportunities to enhance townscape character through high-quality design, improved relationships with surrounding built form, and better utilisation of prominent locations.
- 6.4.47. Just under half of residential site allocations have the potential for negative effects on SAO15. All but two of these are assessed as having significant negative effects, reflecting their location on large greenfield parcels at the edge of the borough, including areas within the Green Belt. These sites lie on the borough's sensitive edges, where openness and landscape character are key defining features. Redevelopment, particularly on larger site allocations, would substantially alter these open landscapes and their visual amenity, and such detrimental effects would be challenging to mitigate.
- 6.4.48. The remaining residential site allocations are assessed as having negligible but uncertain effects. These sites typically represent infill development within established suburban or mixed-use areas of lower landscape sensitivity, where new residential development is likely to be absorbed into the existing townscape with limited impact. Effects remain uncertain until the specific design and layout of development are known.

- 6.4.49. Given its location between a major highway and existing residential development, the employment site allocation is not anticipated to give rise to any significant effects on SAO15.

SAO16 Land Resources (Land Efficiency)

- 6.4.50. Tamworth is predominantly urban in nature, with only limited undeveloped land remaining. The most extensive areas of greenfield land are located to the north around Amington and Coton Lane, to the west around Dunstall Lane, and to the south where the designated Green Belt is situated.
- 6.4.51. Around half of the residential allocations are anticipated to have positive effects on SAO16 due to their brownfield nature. These sites are located within established urban areas and offer opportunities for the efficient reuse of previously developed land. Most are wholly brownfield and therefore achieve major positive effects, while a small number achieve minor positive effects where constraints limit the extent of efficient redevelopment.
- 6.4.52. The remaining residential sites involve development on greenfield land and are therefore likely to give rise to negative effects. Five sites are wholly greenfield land and located within areas of environmental, agricultural, landscape or functional value, resulting in major negative effects. These sites are predominantly situated within the borough's remaining open areas around the borough's edges. A further two sites (22/096 and 22/091) are also wholly greenfield but their precise agricultural value is unknown at this stage, leading to major negative but uncertain effects. The employment site allocation falls into the same category for similar reasons.

SAO16 Land Resources (Agricultural Land)

- 6.4.53. Agricultural land within Tamworth is limited in extent due to the borough's urban character. Most agricultural land is classified as lower-quality Grade 4 or Grade 3, where the precise value is unknown. Only small pockets of higher-quality Grade 2 land remain, located in isolated areas to the north, south and west of the borough. The majority of residential site allocations are therefore assessed as having negligible effects on agricultural land, as they fall within the classified urban area or comprise lower-quality Grade 4 land.
- 6.4.54. Three residential allocations and the one employment allocation have the potential to negatively affect the borough's limited supply of Grade 2 agricultural land to varying degrees. These effects are predominantly concentrated around Ashby Road, where two sites are wholly comprised of Grade 2 land. Development in this area would result in the loss of a significant proportion of the borough's remaining best and most versatile agricultural land, and the cumulative implications of allocating multiple sites in this location should be considered. Three further residential allocations are assessed as having negative but uncertain effects, as they contain areas of Grade 3 land.

SAO16 Land Resources (Mineral Resources)

- 6.4.55. A total of 16 residential site allocations are located within a Mineral Safeguarding Area (MSA) and are therefore assessed as likely to have negative but uncertain effects due to the potential for sterilisation of mineral resources. Two of those sites

(18/007 and 20/090) also lie in close proximity to several mineral assets concentrated in the south of the borough. The remaining residential allocations fall outside of the safeguarded area and are assessed as having negligible effects. The proposed employment allocation lies within the safeguarded area and is therefore assessed as having minor negative but uncertain effects.

SAO17 Waste

- 6.4.56. SAO17 was scoped out of the assessment at this stage. While all new development will inevitably involve an increase in waste generation, it is assumed that all are likely to offer sustainable waste management or recycling practices. However, the impacts of new development on waste generation and recycling will not be determined by its location. Effects will ultimately depend on factors such as waste management policies, processes and facilities available in and around the borough, all of which cannot be determined at this strategic level of assessment. The likely effects of all residential and employment allocations on this objective are therefore negligible.

Summary

- 6.4.57. The appraisal indicates that the housing and employment allocations generally perform well against the Sustainability Appraisal Framework, with relatively few locations showing potential for significant adverse effects. Tamworth's compact urban form provides a strong foundation for sustainable growth, enabling many allocations to benefit from proximity to established infrastructure, services and sustainable travel networks.
- 6.4.58. Residential allocations within or close to the town centre show the strongest performance. Their accessible locations support economic vitality, health and wellbeing, connectivity and efficient use of previously developed land. These sites also offer opportunities for high-quality regeneration capable of delivering multiple sustainability benefits in combination.
- 6.4.59. A clear distinction is evident between brownfield sites, greenfield sites within or adjoining the existing built-up area, and greenfield edge locations. Brownfield locations generally perform well across a wide range of objectives, reflecting their capacity to support regeneration, remediate land, reduce pressure on sensitive landscapes and soils, and integrate effectively with sustainable transport and existing services.
- 6.4.60. Greenfield sites located within or immediately adjacent to the existing urban area also tend to perform well. Although their development results in the loss of undeveloped land, their proximity to existing infrastructure and facilities enables them to contribute to sustainable development, provided environmental impacts are carefully managed and mitigated through the policies of the TBLP.
- 6.4.61. Greenfield edge sites show the most mixed pattern of performance, with a greater likelihood of adverse effects. Their peripheral locations typically result in weaker accessibility, increased reliance on private car travel, and heightened environmental considerations, including the loss of land with landscape, ecological or functional value. These sites also represent some of the borough's limited remaining open

areas, meaning landscape sensitivity is an important factor. Broadly, these sites fall into three clusters:

- Allocations around Ashby Road to the north (18/013 and 22/094)
- Green Belt land south of Gorsy Bank Road (20/090)
- Land around Dunstall Lane on the western boundary (23/585)

6.4.62. Among these, the proposed allocations south of Ashby Road raise the most notable sustainability concerns, reflecting their peripheral setting and existing transport constraints along the corridor towards Fountain Junction. However, their role in contributing to the borough's identified housing needs is a relevant positive factor within the overall appraisal.

6.4.63. Across all site allocations, a number of uncertain effects have been identified. This is typical at this strategic stage and largely reflects gaps in the baseline information, as well as the fact that many effects depend on the detailed design and layout of future development, which will only be known at the planning application stage. Uncertainties are most common in relation to environmental effects, such as biodiversity, water pollution, soil resources and flood risk. In most cases, these uncertainties are expected to be manageable through the application of the TBLP's policy framework and through appropriate mitigation at the planning application stage.

6.4.64. Overall, the proposed housing and employment allocations are expected to make a positive contribution to meeting identified development needs and are broadly compatible with the SA Framework. While some uncertainties and potential adverse effects remain, these are capable of being addressed through the supporting policies of the plan, and therefore broadly, the allocations perform well in sustainability terms.

6.5. Cumulative, Synergistic and Secondary Effects

Introduction

6.5.1. The SEA Regulations require the Sustainability Appraisal to consider cumulative, synergistic and secondary effects. For this assessment:

- **Cumulative effects** are defined as effects that occur where multiple individual actions or changes, each potentially limited in isolation, combine to produce a more significant overall impact.
- **Synergistic effects** are defined as effects that result from interactions between different influences, producing an outcome greater than the sum of their individual contributions.
- **Secondary effects** are defined as indirect effects that arise through a consequential pathway rather than as a direct outcome of implementing the local plan.

6.5.2. The SEA Regulations require that the cumulative effects of a plan or programme are fully considered. This includes the cumulative effects of the Pre-Submission Local

Plan in combination with other plans and programmes (inter-plan effects), and the cumulative effects of individual policies and proposed sites within the Pre-Submission Local Plan itself (intra-plan effects).

- 6.5.3. Table 6.5 presents the assessment of the Pre-Submission Local Plan as a whole against each SA Objective. It identifies the cumulative effects arising from individual policies and site allocations, and, where relevant, considers how the plan may interact with proposals in other plans, programmes and projects.

Assessment of Likely Cumulative Effects

- 6.5.4. The Pre-Submission Local plan contains both development-enabling policies (including site allocations) and development-controlling policies.
- 6.5.5. Table 6.5 sets out the assessment of the Pre-Submission Local Plan as a whole against each SA Objective. It identifies the intra-plan cumulative effects and considers how the development-controlling elements of the plan are expected to mitigate and/or enhance the effects likely to result from the development-enabling components. Where relevant, it also considers how the Pre-Submission Local Plan may interact with proposals in other plans, programmes and projects to produce likely significant effects (inter-plan effects).

Table 6.5: Likely Cumulative Effects of the Pre-Submission Local Plan

SA Objective	Likely Cumulative Effects, including Secondary and Synergistic where appropriate	Cumulative Effect
SAO1 Economy	The spatial strategy (SP1) allocates land capable of delivering 39,200 sqm of employment floorspace and protects existing employment areas under Policy EM1, creating the conditions for further floorspace to come forward through intensification. Together these support continued economic growth over the plan period, despite most new development being housing-led, although the floorspace formally planned for is below the identified net requirement of 87,200 sqm. The plan aligns with Strategic Objective 3, which seeks to support the existing local economy whilst being flexible enough to respond positively to new economic opportunities. Policies across the employment, centre and visitor economy themes collectively reinforce economic activity by strengthening Tamworth's network of centres, supporting regeneration and safeguarding key employment areas. Most employment growth over the plan period arises from the continued safeguarding and renewal of existing Strategic Employment Areas and protection of existing employment land, with only one new employment allocation contributing additional capacity. Centre-focused policies (SP6, TC1, TC2, TC5 and TC6) cumulatively direct retail, leisure and commercial uses to the most accessible and viable locations, supporting footfall, investment and vitality of both the town centre and neighbourhood centres. Regeneration policies for Gungate (TC3) and Ankerside (TC4) add further cumulative benefits by introducing significant new activity, diversifying uses and improving connectivity within the town centre. Employment policies (EM1, EM2 and EM3) cumulatively support economic resilience by protecting established employment areas, enabling appropriate growth and allowing supporting uses that enhance their function. Policy EM4 strengthens Tamworth's visitor economy by enabling development that increases visitor dwell time and supports local employment and supply-chain opportunities. Together, these policies reinforce a clear and consistent spatial pattern for economic activity across the borough, resulting in a minor positive cumulative effect.	+

	Transport and connectivity policies are expected to make a minor positive cumulative contribution to SAO1 by supporting more sustainable travel choices and maintaining accessibility to key services and employment locations. Measures to encourage active travel and public transport, together with requirements for coordinated delivery and servicing arrangements, help support business efficiency and the reliable movement of goods. The Pre-Submission Local Plan is likely to interact with wider economic strategies, including the West Midlands Combined Authority Strategy Economic Plan (2016), Staffordshire Economic Strategy (2023-2030) and Tamworth Economic Development Strategy and Action Plan (2025), together with neighbouring local plans. These strategies and plans promote investment, business growth and improved economic conditions, creating a supportive wider policy environment for delivering the local plan's economic objectives and reinforcing positive cumulative effects at borough, county and wider-regional scales. Overall, a minor positive cumulative effect on SAO1 is anticipated. These cumulative positives are consistent with the employment-related effects identified under SAO2, where safeguarding and enabling growth within established employment areas supports wider economic resilience.	
SAO2 Employment	The plan supports employment growth by safeguarding dedicated employment areas, allocating land for new employment development and enabling appropriate schemes in accessible locations that can support the local economy. This approach ensures a stable supply of land capable of accommodating a range of business needs and supports the creation of employment opportunities consistent with the aims of this SA objective. While the plan cannot directly influence the type or quality of jobs created, it provides the conditions within which a broader range of employment opportunities can emerge over time. To this degree, cumulative employment effects are predominantly influenced by the safeguarding and renewal of existing Strategic Employment Areas, with one new employment land allocation providing limited additional capacity. Employment policies (EM1, EM2 and EM3) contribute cumulatively by supporting appropriate expansion within established employment areas, enabling renewal and allowing supporting uses that enhance operational flexibility for businesses. Policy EM4 strengthens the visitor economy, generating associated employment and supply-chain opportunities relevant to SAO2. Centre-focused policies (SP6, TC1, TC2, TC5 and TC6) add further cumulative influences by directing retail, leisure and commercial uses to	+

	locations with strong accessibility, supporting employment within centres. Regeneration policies for Gungate (TC3) and Ankerside (TC4) introduce new activity within the town centre, supporting diversification and creating opportunities for employment within mixed-use environments. Together, these policies help sustain accessible and resilient employment opportunities across the borough, consistent with the aims of SAO2. Tamworth forms part of the Birmingham Travel-to-Work Area, meaning residents routinely access employment opportunities across neighbouring authorities. Local plans in these areas also safeguard employment land, support business growth and promote regeneration. In combination with the Pre-Submission Local Plan, these policies reinforce the wider availability of employment opportunities across the cross-boundary labour market. This interaction is likely to result in minor positive cumulative effects. Overall, a minor positive cumulative effect on SAO2 is anticipated.	
SAO3 Accessibility	Positive effects have been identified against this sustainability objective, as the local plan is likely to strengthen accessibility across Tamworth by directing development to sustainable and well-connected locations, maintaining essential community facilities and reinforcing the role of centres as accessible hubs for community, healthcare, employment, recreational and cultural activity. The local plan provides a strong framework for supporting accessibility through policies that maintain and strengthen access to essential services (HC1-HC3), sustain viable and accessible centres (TC1-TC3 and TC6) and promote well-connected development patterns (SP2 and SP9). Regeneration policies (TC4 and TC5) introduce new activity within the town centre, diversifying services and reinforcing walkable access. Policies relating to open space, recreation and sports facilities (HC5-HC7) help maintain access to key community assets, while the neighbourhood centres policy (TC6) supports distributed access to local facilities across the borough. Transport policies (TA1, TA2) encourage active and public transport modes and support efficient movement, helping maintain accessibility across the borough. Taken together, these mechanisms ensure that development contributes to accessible everyday environments and convenient access to essential services. The majority of site allocations are expected to contribute positively to accessibility, reflecting their location within a compact and predominantly urban borough where established services, facilities and	+

	sustainable travel networks are generally accessible. Several allocations lie within existing neighbourhoods where new development is likely to reinforce access to everyday services and social infrastructure. Others are situated close to centres, green corridors or active travel networks, or are expected to incorporate on-site services or walking and cycling routes as part of their design. A small number of larger allocations lie at the edges of the borough where accessibility is weaker, although relevant policies in the plan will help ensure that supporting infrastructure and service access are strengthened as development comes forward. The local plan is likely to interact positively with transport programmes including the Staffordshire Local Transport Plan, the Local Cycling and Walking Infrastructure Plan and relevant neighbouring authorities' transport policies, which support improvements to local bus services, active travel routes and cross-boundary connectivity. When combined with local plan policies aimed at improving access to education, healthcare, employment and community facilities, these programmes could strengthen local accessibility and service catchments. Taken together, the local plan is likely to generate minor cumulative positive effects on accessibility. Positive effects arise from strengthened access to services, well-connected development patterns and reinforced centre roles. Minor negative cumulative effects may arise from increased demand associated with new development, but these are small in scale and managed through infrastructure and community-facility policies. As a result, these negative influences do not outweigh the broader positive determinants of accessibility supported by the plan.	
SAO4 Health	Positive effects have been identified against this sustainability objective, as the local plan is likely to improve the health and wellbeing of Tamworth's residents by strengthening access to essential services, supporting healthier environments and creating opportunities for physical activity and social interaction. The majority of policies expected to influence health and wellbeing are anticipated to have positive effects, reflecting the broad contribution of the plan to the social, physical and environmental determinants of health. The local plan provides a strong framework for supporting health and wellbeing through policies that maintain and strengthen access to essential services (HC1, HC2 and HC3) and promote access to open space, recreation and leisure facilities (HC5, HC6 and HC7), and support healthier everyday environments through high-quality design, green infrastructure and well-connected walking and cycling	+

	routes. Policies that reduce exposure to environmental stressors (EP1 and EP2) also contribute to healthier environments by managing pollution sources and improving baseline conditions. Secondary effects may arise where improved accessibility, social infrastructure and healthier environments support increased physical activity and healthier behaviours. Synergistic effects may also occur where design, green infrastructure and active travel policies interact to create more supportive conditions for everyday health and wellbeing. Taken together, these mechanisms ensure that development contributes to healthier everyday environments, supports opportunities for physical and social interaction, and minimises the potential for adverse health effects associated with growth. The majority of site allocations are expected to contribute positively to health and wellbeing, reflecting their location within a compact and predominantly urban borough where established open spaces, services and facilities are generally accessible. Several allocations lie within existing neighbourhoods where new development is likely to reinforce access to everyday services and social infrastructure. Others are situated close to green corridors, parks or active travel networks, or are expected to incorporate green infrastructure, open space or walking and cycling routes as part of their design. The precise nature of these effects will depend on detailed design proposals, although the anticipated positive effect is supported and managed by the relevant policies in the plan. Some allocations may have mixed minor positive and minor negative effects where existing open space is affected, although mitigation and replacement measures provided by wider policies reduce the scale of negative impacts. The introduction of new homes and employment floorspace will increase the number of people living and working within the plan area, resulting in greater overall exposure to existing sources of air pollution, noise and other sources of emissions. These activities are expected to give rise to minor increases in pollution-generating activity, resulting in a minor negative cumulative effect on exposure to air pollution, noise and other environmental stressors. Construction-related impacts are anticipated to be short-term and temporary, while operational impacts are longer term. Relevant environmental protection policies, such as EP1 and EP2, are expected to avoid unacceptable effects on human health and require mitigation to minimise exposure, although cumulatively, residual minor negative effects are likely to remain. Taken together, the local plan is likely to generate minor positive cumulative effects on health and wellbeing. This reflects improved accessibility, stronger social infrastructure, enhanced active travel networks, green infrastructure and better everyday environments. Minor negative cumulative effects	
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	may arise from additional pollution-generating activity associated with new development, but these are small in scale, partly temporary, and managed through environmental protection policies. As a result, these negative influences do not outweigh the broader positive determinants of health supported by the plan. Positive effects are expected to emerge over the long-term as new dwellings, facilities and supporting infrastructure are delivered. No potential for cumulative effects associated with other plans and programmes is identified.	
SAO5 Quality of Life	As a whole, the local plan establishes a strong and coherent place-shaping framework that is likely to support the creation of safer, more attractive and more socially cohesive environments across the borough. The suite of design, placemaking and public realm policies collectively require development to be well-structured, legible and inclusive, and to contribute positively to townscape and local distinctiveness. Applied across multiple schemes, these requirements mean that new development is more likely to reinforce coherent neighbourhood patterns and create public spaces that feel safe, comfortable and welcoming. Transport and movement policies require people-centred design principles and safe, well-lit pedestrian routes, and they set expectations for managing car use in ways that support safer streets. These provisions collectively have positive effects for the way in which streets function and how easily and safely people can move through and use their surroundings. The plan also comprehensively protects and enhances the facilities, open spaces and recreation assets that underpin community functions. By requiring the retention, improvement or provision of community infrastructure, the plan helps maintain the conditions in which social interaction and community cohesion can develop as growth comes forward. Supporting environmental protection policies require development to limit pollution and other amenity impacts, supporting environments that feel healthier and more comfortable. Climate-responsive design requirements ensure that new development incorporates measures to reduce overheating and improve environmental comfort. Key regeneration proposals in the town centre provide a focused opportunity to improve the quality, vibrancy and safety of key public spaces, reinforcing the borough's identity and enhancing the experience of place. Considered cumulatively, these policy requirements shape a pattern of development that is more coherent, more attractive and more supportive of everyday quality of life that would likely otherwise occur, with multiple developments contributing incrementally to safer, better connected and more distinctive neighbourhoods.	++

	Taken together, the plan is likely to deliver a significant positive cumulative outcome for SAO5, with the potential for safer streets, more attractive and distinctive places, stronger everyday environments and improved opportunities for community cohesion. Although minor negative cumulative effects may arise from increased activity or pressure on facilities from growth, these are expected to remain limited in scale, as the plan includes policies that protect environmental amenity and secure appropriate infrastructure where necessary. No potential for cumulative effects associated with other plans and programmes is identified.	
SAO6 Housing	The TBLP will deliver a minimum of 3,945 new homes by 2043, helping to meet housing needs in the borough and support the creation of mixed and sustainable communities. The plan provides a clear framework for delivering a balanced mix of homes, including affordable housing and a range of types and tenures, supported by policies that guide the scale, distribution and quality of new development. Policies relating to specialist accommodation and provision for Gypsies, Travellers and Travelling Showpeople offer positive frameworks for assessing proposals should they come forward, although they do not allocate sites and therefore do not contribute directly to housing delivery. Design-led requirements ensure that new homes are high-quality, inclusive and adaptable, reinforcing the wider housing strategy and supporting the creation of well-designed neighbourhoods. Residential allocations across the borough contribute to overall supply and help ensure a balanced pattern of growth. As development comes forward over time, these combined influences support improved housing choice and better provision for different groups. The cumulative effect of this combined approach is positive, reflecting the contribution the plan makes to helping meet the needs of all residents and supporting mixed and sustainable communities. However, the level of housing proposed does not fulfil the housing need identified by the revised Standard Method, with 4,663 homes remaining unmet. This moderates the overall cumulative effect, which is therefore assessed as a minor positive, with effects expected to be long-term and permanent. Cross-boundary influences may arise as unmet need is considered through neighbouring and wider Greater Birmingham Housing Market Area (GBHMA) planning processes, although these do not represent adverse effects arising from the TBLP. The local plan is also likely to generate positive cumulative effects through its interaction with other local plans and strategies that promote conditions	+

	for housing delivery across the GBHMA. Together, these plans and programmes support a wider supply of good-quality homes and improved housing choice across the functional housing market.	
SAO7 Sustainable Travel	Positive cumulative effects are anticipated in relation to sustainable travel, reflecting the combined influence of policies that support accessible development patterns, prioritise sustainable modes and reinforce opportunities for efficient movement across the borough. Policies including SP9 and TA1 ensure that development is planned and designed to prioritise pedestrians, cyclists and public transport users, reduce reliance on private vehicles and strengthen opportunities for sustainable movement. This approach is reinforced by Strategic Objective 11, which overarchingly promotes development that supports walking, cycling and public transport. Secondary effects may arise where improved accessibility indirectly encourages greater uptake of sustainable modes, while synergistic effects may occur where design, healthy communities and centre-based policies work together to reinforce sustainable travel choices. Tamworth's compact urban structure means that the majority of site allocations are located within established areas where public transport routes, services and facilities are already accessible. Development in these locations is expected to reinforce short-distance travel patterns and support convenient access to everyday needs. Allocations situated near green corridors, parks or active travel networks are likely to provide additional opportunities for walking and cycling. Some allocations may generate minor pressures where movement networks require upgrading, although mitigation secured through wider policies is expected to limit these impacts. Growth over the plan period will increase overall trip generation as more residents travel to reach services, facilities and employment opportunities both within and beyond the borough. Policy SP2 moderates these pressures by focusing development in locations already served by public transport and infrastructure that reduces the need to travel, supporting lower car dependency and encouraging sustainable travel choices. Policies including SP6, TC1 and TC6 reinforce this approach by concentrating trip-generating uses within accessible centres where public transport access, services and employment opportunities are already established. This strategy is expected to reduce the need for longer-distance travel to reach key services and facilities and support more efficient movement patterns across the borough.	+

	Positive effects are reinforced by secondary benefits relating to air quality, climate change mitigation, health and town centre vitality, as reduced car dependency supports wider environmental and social outcomes. The local plan is also likely to generate positive cumulative effects through its implementation in combination with the Staffordshire Local Transport Plan, the Local Cycling and Walking Infrastructure Plan, WCMA transport programmes and neighbouring authorities' transport strategies. These plans and programmes all promote active travel, public transport improvements and better connectivity, and the local plan's wider policies reinforce these wider initiatives, resulting in positive cumulative effects for sustainable travel across the area. Overall, a cumulative minor positive effect is likely in relation to SAO7. Positive effects arise from policies that support sustainable travel choices, direct development to accessible locations and strengthen local accessibility. Negative pressures associated with increased trip generation are expected to be moderated by the borough's compact form and established sustainable transport links where development occurs within established areas. Effects are expected to be long term and permanent. Some wider uncertainty remains, as positive outcomes partly depend on behavioural change and uptake of sustainable modes, which cannot be fully assessed through the sustainability appraisal process.	
SAO8 Air, Light and Noise Pollution	Delivery of 3,945 dwellings and associated employment development over the plan period will inevitably increase traffic volumes and associated servicing movements, resulting in cumulative pressures on air quality and noise. The borough's compact and urban form moderates these pressures by reducing average trip lengths and supporting shorter, local journeys. Centre-first policies (SP6, TC5 and TC6) reinforce this moderating influence by directing development to accessible locations, although this spatial focus can concentrate activity within particular areas, meaning other priorities like regeneration and intensification may generate localised servicing and movement pressures alongside wider benefits. Construction activity associated with allocations may occur at different points in the plan period. The predominantly small scale of allocations means that significant adverse effects arising from spatial or temporal overlap is unlikely. Where construction phases do coincide, temporary minor negative effects may arise through dust, particulates, construction traffic and short-term light pollution. These effects are expected to be mitigated through standard construction management, although occasional overlap in	-

	construction periods could still give rise to short-term cumulative effects. Higher density development (HO2) may also increase localised noise and activity, although effects remain uncertain until detailed design stages. The local plan contains several policies that collectively support improved environmental conditions and help to moderate cumulative effects. Environmental-quality policies (EP1, EP2, NE1, NE2 and NE6) provide a consistent framework for managing pollution sources, buffering sensitive receptors and mitigating potential adverse effects across allocations. Requirements for green and blue infrastructure provide opportunities to moderate environmental conditions by supporting vegetation cover, microclimate regulation and local buffering, which can contribute to small cumulative improvements across the borough. Policies supporting sustainable travel and reduced car dependency (SP9, TA1 and SP2) help to moderate cumulative emissions by enabling lower-emission travel choices and supporting modal shift. The centre-first approach further contributes to cumulative positives by facilitating shorter journeys and improving local access to services and facilities. The local plan will interact with other plans and programmes, including the Staffordshire Local Transport Plan, Staffordshire LCWIP, WCMA transport programmes, neighbouring local plans and national programmes such as the Clean Air Strategy and the 25 Year Environment Plan. Together, these programmes shape traffic patterns, modal shift and emissions standards, meaning the local plan's policies will contribute to cumulative effects on air quality, light and noise. This combined context may moderate negative effects associated with growth and activity, while also creating potential for positive cumulative effects where wider transport and environmental initiatives reduce pollution. Overall, a minor negative cumulative effect on SAO8 is anticipated. This arises from growth-related emissions and construction-phase pressures on air quality, noise and light pollution. Most effects are short-term and temporary, particularly those linked to construction, although longer operational effects will likely persist where development increases activity and movement. The plan's environmental quality and sustainable transport policies help to moderate these pressures, but they do not fully offset cumulative negatives.	
SAO9 Soils and Water Quality	Growth over the plan period is expected to generate cumulative pressures on soil quality and the water environment, through interactions between land-use change, construction activity and operational pressures. As a predominantly urban borough, many allocations are located within established	+/-

	developed areas, and the policies of the plan place strong emphasis on brownfield and underutilised land. This is expected to generate minor positive cumulative effects on soil quality by limiting additional soil sealing and supporting more efficient use of land. Similar approaches in other plans to land-use efficiency and minimising loss of agricultural land may reinforce these positive influences. Despite this, growth will still result in some loss of greenfield and agricultural land. When considered across several allocations, and in combination with neighbouring local plans and infrastructure projects, this is likely to lead to minor negative cumulative effects on soil through disturbance, compaction and potential contamination. These effects are expected to be dispersed rather than concentrated, but remain relevant at the borough scale over the lifetime of the plan. Policies EP2 and EP3 help to moderate cumulative soil-related risks by ensuring land is made safe and suitable for development and that soils are conserved, reused and managed sustainably across construction and operation. Cumulative pressures on the water environment may arise through both construction-phase and operational pathways. The predominantly small scale of allocations means extensive overlap in construction activity is unlikely, although occasional coinciding phases could increase risks of sediment, dust, pollutants and runoff, particularly where sites are hydrologically connected or located close to sensitive waterbodies. In combination with other plans and projects involving construction activity, this could contribute to minor negative cumulative effects on water quality. Long term operational influences may also arise, as increased population and employment may place additional pressure on water resources, and expanded impermeable surfaces increase runoff volumes and pollutant pathways. Some of these effects may extend beyond the borough boundary where catchments and groundwater systems are shared. The local plan will operate in combination with the Humber River Basin Management Plan, the Staffordshire Local Flood Risk Management Strategy, Lead Local Flood Authority programmes, Severn Trent's Water Resources Management Plan and neighbouring authorities' local plans. Together, these programmes provide a consistent basis for water-quality protection, sustainable drainage and appropriate management of water resources across the River Tame and River Anker catchments. Within the local plan itself, Policy FL3 reinforces these frameworks by requiring development to demonstrate no adverse impact on water quality and to incorporate appropriate pollution-prevention and water efficiency measures. Wider policies on SuDS, flood risk and drainage, and green and blue infrastructure further support this approach by managing runoff and reducing pollutant pathways. In combination,	
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	these mechanisms are likely to contribute to minor positive cumulative effects on the water environment by strengthening pollution-prevention measures, while also helping to moderate potential negative cumulative effects associated with growth and increased surface-water pressures. Overall, a mixed cumulative minor positive and minor negative effect on SAO9 is anticipated. Minor positive effects arise from the efficient use of land and from policy frameworks that support protection of the water environment. Minor negative effects arise from soil disturbance associated with the loss of some greenfield and agricultural land, together with construction-related pressures on water quality. Some uncertainty remains, as cumulative outcomes depend on effective implementation of mitigation across multiple developments and plans.	
SAO10 Climate Mitigation	Several policies within the local plan contribute to reducing greenhouse gas emissions, either by shaping the design and performance of new development or by influencing patterns of movement and land use. SP3 sets out the local plan's overarching approach to moderating emissions by promoting low-carbon design, construction and operation, maximising energy efficiency, reducing embodied carbon and supporting renewable and low-carbon energy generation. This approach is supported by a wider suite of policies requiring energy efficient buildings and low-carbon heating technologies, alongside policies that promote tree planting, blue-green infrastructure and the protection and provision of open space. Transport, design and public realm policies further reinforce opportunities for walking, cycling and public transport, reducing reliance on private vehicles and supporting lower-carbon travel patterns. Together, these policies provide a coherent and mutually reinforcing framework that seeks lower emission patterns. The way development is distributed across the borough further shapes cumulative outcomes. Tamworth's compact urban form means that the majority of allocations are located within established areas with good access to services, facilities and transport networks, supporting shorter travel distances and increasing opportunities for walking, cycling and public transport. As a result, the distribution of development interacts with transport and accessibility policies to reduce reliance on private car use and moderate transport-related emissions across the plan period. Allocations near green corridors, parks or active travel networks provide additional opportunities for walking and cycling, while those incorporating green infrastructure contribute minor positive effects through carbon sequestration. Policies requiring community facilities and open spaces to be located in accessible locations reinforce these patterns, ensuring that different forms of development support similar low-carbon outcomes.	+/-

	Notwithstanding these moderating influences, cumulative negative effects will arise as development needs are met. Growth will increase greenhouse gas emissions through additional vehicle movements, transport-related emissions, fuel consumption, energy use in new dwellings and premises, and the production and use of construction materials. Embodied carbon associated with construction will also contribute to cumulative pressures, and although mitigation is expected through policy requirements, construction-related embodied carbon cannot be fully offset. Temporary negative effects may occur where construction periods overlap, increasing construction traffic, fuel use and construction-related emissions. Although mitigation is expected through policy requirements, residual negative effects will remain. The local plan will also operate in combination with external plans and strategies, including the Council's Climate Change Strategy, the Local Nature Recovery Strategy and neighbouring authorities' local plans. Together, these plans reinforce a wider policy environment that supports low-carbon travel, resource efficiency and renewable energy generation, complementing the local plan's overall direction on climate mitigation. National decarbonisation measures, including the transition to lower-emission vehicles set out in the Transport Decarbonisation Plan and continued grid decarbonisation under the UK Net Zero Strategy, will also interact with the plan's policies over the plan period, contributing to minor positive cumulative effects by supporting reduced operational emissions from development and travel. Overall, a mixed minor positive and minor negative cumulative effect is likely in relation to SAO10. Positive effects arise from policies that support energy-efficient development, promote low-carbon heating, encourage sustainable travel choices and integrate green and blue infrastructure. Negative pressures associated with construction activity, embodied carbon and operational emissions will still arise as development is delivered. The combined influence of plan policies, external strategies and national decarbonisation measures will help moderate these pressures by improving the energy performance of new development and reinforcing opportunities for lower-carbon travel, with transport-related emissions also likely moderated by the borough's compact urban form and established sustainable travel links. Effects are long-term, with temporary construction disturbance.	
SAO11 Adapting to the Effects of Climate Change	Across the plan as a whole, cumulative effects on climate change adaptation are predominantly positive, driven by the combined influence of policies that secure resilient design, integrated green infrastructure, sustainable drainage and water-efficient development. These measures interact to	+

	reduce exposure to extreme rainfall, surface water flooding and overheating, and to strengthen the capacity of new and existing developments to cope with more frequent and intense climate hazards over time, contributing to improved climate resilience in Tamworth. The local plan makes specific provision for adapting to the effects of climate change, particularly through SP3, which requires development to address overheating, water scarcity and flood risk through sustainable design, green infrastructure, water efficiency and nature-based solutions. Positive cumulative effects are also expected where design, natural environment, open space and climate-specific policies reinforce one another, ensuring that development incorporates SuDS, shading, ventilation, water efficiency and nature-based solutions. These interactions support adaptive water management, moderate urban heat, and improve infiltration and storage during heavy rainfall. Secondary benefits are also likely to emerge from policies that restore watercourses, enhance blue-green infrastructure networks and improve soil function, which collectively contribute to flood resilience and cooling. Some uncertain or minor negative cumulative effects remain. The delivery of new homes, employment land and associated infrastructure will increase impermeable surfaces and place additional pressure on water resources, with potential implications for surface water runoff, localised flood risk and demand for water. The local plan also aligns with several external plans and strategies, including the Staffordshire Local Flood Risk Management Strategy, Lead Local Flood Authority programmes, the Local Nature Recovery Strategy, the Council's Climate Change Strategy and neighbouring local plans. Together, these plans reinforce a wider policy environment that supports improved drainage, nature-based resilience, water efficiency and flood-risk management, complementing the plan's overall direction on climate adaptation. National measures to strengthen climate resilience, including measures set out in the Environment Act 2021, will also interact with the plan's policies over the plan period. Overall, the local plan is anticipated to generate a minor positive cumulative effect on SAO11.	
SAO12 Flood Risk	Growth in the plan area will increase impermeable surfaces and may give rise to short term construction-related flood risk. These influences arise from several forms of change occurring at the same time, including construction activity and increased runoff associated with new development. When	-

	considered together, these factors are assessed as likely generating a residual minor negative cumulative effect at the plan level. These cumulative pressures are expected to be managed by the combined operation of the plan's flood risk policies, which together provide a framework for reducing exposure to flood hazards, managing surface water risk and supporting long term resilience. The policies work collectively to shape how new development responds to areas of differing flood risk across the plan area. Spatial requirements in the plan (FL1) and expectations for safe access and lifetime safety (FL2) guide proposals towards locations with lower levels of flood risk and ensure that development demonstrates appropriate flood risk management. Measures that encourage SuDS and natural flood management processes (FL3) support moderation of run-off and create opportunities for naturalisation. Protection and promotion of strategic flood mitigation infrastructure (FL4) helps maintain long-term resilience. When these mechanisms operate together, they influence how development comes forward and are intended to support more consistent management of surface water and fluvial hazards over time. Secondary and synergistic effects may arise where SuDS, river restoration and naturalised corridors also support improvements in water quality, soils, biodiversity and landscape character. These wider benefits are uncertain in scale because they depend on the type and location of schemes that come forward. The majority of allocations are located in Flood Zone 1 and do not contribute to cumulative flood risk. A small number lie partly or wholly within higher risk areas, resulting in significant adverse site specific effects. These influences are localised on smaller scale sites, and are expected to be moderated through national requirements, engagement with key stakeholders and the wider policy framework of the local plan. Overall, minor negative effects are anticipated on flood risk over the plan period, as there is potential for localised flood risk during construction, and development may increase flood risk in the long term, whilst the plan policies work to mitigate this and reduce flood risk to avoid significant effects.	
SAO13 Biodiversity	The scale and distribution of development proposed in the local plan is likely to generate cumulative pressures on biodiversity. Although the borough is predominantly urban with a limited greenfield resource, development will still result in land take on greenfield sites, together with construction	+/-

	disturbance and increased recreational activity once new homes are occupied. Some site allocations lie close to designated nature conservation sites or would result in the loss of undeveloped land, and additional secondary pressures may arise from increased demand on water resources. Background trends indicate ongoing national declines in habitat extent and species diversity, and site-based approaches do not always capture wider landscape-scale ecological considerations. These wider trends contribute to some uncertainty in how incremental changes associated with new development may influence biodiversity trends over time. The effects of new development are expected to be minor negative, long term and permanent, although disturbance during construction would be temporary. The precise extent of impacts remains uncertain until detailed proposals come forward at the planning application stage. The local plan seeks to ensure the protection and enhancement of biodiversity across the borough. This is delivered through a comprehensive set of natural environment policies (NE1, NE2, NE3, NE4, NE5 and NE6) that collectively protect designated sites, maintain ecological networks and require at least ten per cent biodiversity net gain or no net loss where national requirements do not apply. Strategic Objective 7 reinforces this approach by supporting the protection and enhancement of biodiversity and geodiversity assets across the borough. Several wider policies also support minor positive cumulative effects by embedding nature-based considerations across the design, layout and delivery of development, helping ensure that green and blue infrastructure and multifunctional open space are integrated into new schemes. A separate Habitats Regulations Assessment (HRA) has concluded that the local plan will not likely have any adverse effects on European site integrity, alone or in combination. The local plan also interacts with biodiversity-related programmes including the Local Nature Recovery Strategy, the Humber River Basin Management Plan, the 25 Year Environment Plan and neighbouring local plans. In combination, these programmes support habitat creation, geodiversity protection and improved ecological connectivity, and together with local plan policies are likely to generate positive cumulative effects on nature recovery. Overall, the cumulative effect in relation to SAO13 is mixed minor positive and minor negative. Negative effects arise from land take, disturbance and increased recreational pressure, although permanent negative effects on designated sites are not anticipated. Positive effects arise from the plan's strong biodiversity policy framework and the delivery of biodiversity net gain. While these policies provide strong safeguards, there remains some risk that incremental changes and ongoing greenfield	
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	development pressures could erode assets over time, contributing to uncertainty in the overall cumulative effect. These effects are long term, with temporary construction disturbance, and will be further clarified as detailed proposals are progressed.	
SAO14 Historic Environment	Tamworth contains a rich historic environment, including designated and non-designated heritage assets, conservation areas and areas of archaeological potential. The local plan provides a strong framework for conserving and enhancing heritage significance through heritage-specific policies (including SP7, HE1, HE2 and HE3) and design-led requirements (including SP8, DE1, DE7 and DE8). These policies operate together to ensure that development is informed by an understanding of heritage significance, help to avoid or minimise harm, and can support enhancement where appropriate, including the sensitive reuse of historic buildings. Strategic Objective 5 reinforces this approach by setting a clear plan-wide expectation that heritage significance should be protected and, where appropriate, enhanced. Taken together with statutory protections and Conservation Area Appraisals, these mechanisms are expected to support minor positive effects across much of the borough. Cumulative effects are most pronounced in the town centre, where several allocations, regeneration proposals and town centre focused policies (SP6, TC1, TC2, TC3 and TC4) combine to concentrate change within the historic core. The interaction between intensification, mixed-use redevelopment, public realm improvements, including major regeneration opportunities at Gungate and Ankerside, together with policies that direct and manage change in this location, results in a series of overlapping influences on heritage assets, townscape character and setting. This pattern of change gives rise to mixed minor positive and minor negative effects, reflecting opportunities to improve the public realm and better reveal significance, as well as increased development activity within an area of high heritage sensitivity. In conjunction with the wider heritage, design and placemaking policies of the plan, the town-centre policy framework provides a coordinated basis for shaping change across multiple sites, with the requirements of TC3 and TC4 moderating some of the overlapping influences within the historic core. There is no clear interaction between the Pre-Submission Local Plan and other plans or programmes that would give rise to inter-plan cumulative effects for this SA objective. Overall, the local plan is assessed as generating mixed minor positive and minor negative effect on SAO14, with no significant adverse impacts identified. Effects remain uncertain where detailed design is	+/-

	not yet known, but the plan's heritage and wider design policies provide a strong basis for managing change in sensitive areas.	
SAO15 Landscape and Townscape	The local plan establishes a strong and coherent design framework that promotes high-quality built form, well-designed public realm, improved legibility and a stronger sense of place. Applied across the borough, these policies set clear expectations for development quality and ensure that new development responds positively to existing settlement form, townscape character and the quality of streets and spaces. This creates an overarching positive influence on townscape, supporting more coherent, attractive and distinctive environments over the plan period. The plan's design and placemaking policies operate cumulatively by embedding principles that support well integrated, legible and high-quality places. The town centre is a particular focus for change, and the plan contains a number of inter related placemaking and regeneration policies that guide how this change should occur. These policies work together to ensure that new development in the town centre comes forward in a sensitive, high quality and cohesive manner, strengthening townscape coherence, improving visual quality and enhancing the overall experience of place. Across Tamworth's wider urban area, townscape quality is positively managed by a range of design policies that support high-quality development at neighbourhood scale. This includes a specific policy setting standards for infill and backland development, which reflects Tamworth's high proportion of small-scale schemes and ensures that incremental change contributes positively to local character and the quality of streets and spaces. Negative cumulative effects relate primarily to landscape change associated with a small number of large housing allocations located within the borough's largest remaining areas of greenfield land, including two sites within the designated Green Belt. These allocations represent major development sites, with Sites 18/013, 20/094, 20/090, 23/585 and 22/095 introducing significant additions of built form into the northern, western and southern greenfield areas of Tamworth, including Green Belt to the south. Development in these locations will result in permanent loss of greenfield and Green Belt land and will alter landscape character. Although the borough's compact urban form moderates some effects due to the proximity of these sites to established urban areas, residual negative landscape impacts remain. The changes are concentrated in specific parts of the north and south of the borough rather than widespread, but are significant for the sites affected and cannot be fully mitigated. Design and built form policies will help manage these influences, although they cannot fully offset the permanent nature of landscape change associated with development on open land.	+/-

	There is no clear interaction between the Pre-Submission Local Plan and other plans or programmes that would give rise to inter-plan cumulative effects for this SA objective. Overall, the local plan is assessed as generating mixed minor positive and minor negative cumulative effects on SAO15. Positive effects arise from the plan's strong design, placemaking and regeneration policies, which collectively support improved townscape quality and reinforce local distinctiveness, particularly within the town centre and across neighbourhoods where small-scale development is common. Negative effects arise from the small number of large housing allocations within the borough's largest remaining areas of greenfield land, including two Green Belt sites, where landscape change is permanent and only partly mitigated. Some residual uncertainty remains until detailed design proposals come forward.	
SAO16 Efficient Use of Land	Positive cumulative effects are expected to arise from the way the spatial strategy (SP1), density expectations (HO3), regeneration priorities and development management policies interact to support efficient land use. The plan strengthens compact development patterns by focusing growth in accessible locations, promoting brownfield regeneration and encouraging higher-density development where it can be accommodated effectively. These components reinforce one another, ensuring that development is directed to areas where land can be used most productively. Synergistic effects occur where higher-density development interacts with regeneration and design policies to optimise site potential while maintaining high-quality standards of place-making. Secondary effects may arise where the re-use of underused land or existing buildings reduces pressure on remaining undeveloped land, indirectly supporting more efficient patterns of land use across the borough. The combined influence of infill, redevelopment and mixed-use regeneration contributes to land-efficient development by enabling multiple forms of change to be absorbed within established neighbourhoods and accessible locations. Although the strategy places strong emphasis on brownfield regeneration and higher density development, it cannot accommodate all growth within the existing built fabric. The plan therefore includes the release of a limited extent of Green Belt land, comprising two allocations that together deliver 856 homes. Evidence indicates that this scale of release will not undermine the wider functions of the Green Belt, although it remains a negative influence on land efficiency. The strategy also requires	+/-

	some development on a small number of greenfield peripheral sites. These influences introduce a modest negative component within the overall pattern of land use change, but they occur alongside a spatial strategy that directs most growth to accessible locations, supports brownfield regeneration and encourages efficient forms of development. Overall, mixed minor positive and minor negative effects have been identified. There is no clear interaction between the Pre-Submission Local Plan and other plans or programmes that would give rise to inter-plan cumulative effects for this SA objective.	
SAO17 Waste	The introduction of 3,945 new dwellings and 39,200 sqm of new employment floorspace through the local plan is likely to increase demolition, construction and operational waste over the plan period. This reflects the floorspace the Plan formally provides for through the allocated site. Additional floorspace delivered through intensification of existing employment areas is not counted within expected delivery and is therefore not included in this assessment. Were it to come forward, waste arisings would increase accordingly. National trends show gradual improvements in recycling and reductions in household waste arisings, yet these wider patterns are unlikely to significantly reduce waste generation within the borough. The combined influence of multiple allocations and policies therefore gives rise to a long-term minor negative cumulative effect. A degree of uncertainty is inherent, as the degree of effect will depend on future occupier behaviour, design choices, construction methods and material selection, all of which will influence the scale and nature of waste arisings across the plan period. Policy SP3 provides a plan-wide moderating influence on operational waste, promoting efficient resource use and improved waste management. This is expected to support better handling of operational waste and may encourage reduced waste generation. Several other policies in the local plan, including SP6, SP7, HE1, EM4, TC3 and TC4, support this approach by promoting the reuse and upgrading of existing land and buildings, which can help to reduce demolition waste and strengthen circular economy principles where redevelopment occurs. These influences provide minor positive effects, but they are modest, localised and not sufficient to offset the cumulative increase in waste generation associated with levels of development across the plan period, particularly as waste management capacity and systems sit largely outside the control of the local plan.	

	The local plan also interacts with waste-related programmes including the Staffordshire Joint Municipal Waste Management Strategy and the Staffordshire Waste Local Plan. These programmes support waste minimisation, recycling and waste infrastructure planning, and when combined with local plan policies, are likely to generate positive cumulative effects at borough and county scales. Overall, the local plan is assessed as generating a minor negative cumulative effect on SAO17. Positive influences are noted, but they are not strong enough to change the overall judgement. Effects are long term and permanent, with uncertainty linked to future design, construction methods and occupier behaviour.	
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6.6. Mitigation and Enhancement

- 6.6.1. Mitigation and enhancement measures have been identified throughout the plan-making process, including through the appraisal of the Pre-Submission Local Plan. The appraisal has identified a range of measures to help avoid, reduce or offset potential negative effects and to strengthen positive effects associated with the implementation of the plan. These measures are highlighted throughout the report, including within the detailed appraisal matrices presented in Appendices F and G.
- 6.6.2. Recommendations relating to mitigation and enhancement were also generated at earlier stages of plan-making, including through the Advanced Regulation 18 Interim SA Report (June 2026). These earlier recommendations, and the changes made to policies in response, are summarised in Appendix E.
- 6.6.3. At this stage, the assessment of policies has been undertaken on an individual basis. As a result, some adverse effects identified are expected to be avoided or moderated through requirements contained in other policies within the local plan, including those relating to design quality, environmental protection, green infrastructure, sustainable travel and climate mitigation. This reflects the internal mitigation provided by the policy framework as a whole.
- 6.6.4. Further detailed mitigation is expected to be secured through project-level design and assessment at the planning application stage. This includes the application of best practice in layout, construction management, biodiversity net gain, sustainable drainage and energy efficiency, alongside compliance with relevant legislative requirements.

Chapter 7: Conclusions and Next Steps

7.1. Introduction

- 7.1.1. This section summarises the key conclusions and sets out the next steps, including how to comment on this report.

7.2. Conclusions

- 7.2.1. The Sustainability Appraisal of the Pre-Submission Local Plan has been undertaken in accordance with current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance. The appraisal has applied the SA Framework developed at the Scoping stage to assess the likely effects of the plan's policies, allocations, reasonable alternatives, vision and strategic objectives.
- 7.2.2. The vision and strategic objectives are considered appropriate. The appraisal identified generally positive relationships with the SA objectives, with any tensions reflecting the constraints of a compact borough with limited development capacity rather than inherent incompatibility with the SA Framework.
- 7.2.3. Tamworth is a compact and heavily constrained borough with very limited land available for development and a lack of opportunity for outward expansion. Against this context, the revised Standard Method produced a substantially increased housing requirement that cannot feasibly be delivered within the borough. These factors have shaped both the scope of the appraisal and the strategy set out in the Pre-Submission Local Plan. The SA has therefore focused on a narrow set of reasonable alternatives and assessed how growth can best be accommodated while managing sustainability effects.
- 7.2.4. Further work undertaken since the Interim SA Stage concludes that 3,945 homes can be accommodated within the borough, with 4,663 homes forming unmet need. The Plan allocates land capable of delivering 39,200 sqm of employment floorspace against an identified net requirement of 87,200 sqm. The balance is expected to come forward through intensification of and extensions within existing employment areas under Policy EM1, but given the low rate of employment floorspace delivery in recent years this has not been counted within expected delivery over the plan period. Any floorspace delivered through this route will be treated as windfall.
- 7.2.5. Overall, the plan performs positively against many SA Objectives, particularly those relating to social and economic outcomes. The strategy directs development to accessible locations within the existing urban area, enabling new development to benefit from established infrastructure, services, facilities and sustainable travel networks. Concentrating growth in these locations supports self-containment, reduces reliance on longer-distance travel and strengthens opportunities to enhance local services and facilities. The strategy also reinforces regeneration priorities, particularly within the town centre, and modest-scale brownfield redevelopment contributes positively by supporting the reuse of previously developed land and improving local environments.

- 7.2.6. While previously developed land will make a key contribution, additional land is required to achieve the proposed housing numbers. The strategy therefore includes a limited amount of greenfield development, including small-scale Green Belt release, to contribute towards housing needs. This will give rise to unavoidable adverse effects associated with development on open land, including permanent land take and changes to landscape character and openness around the borough's edges. These effects are moderated by the extent to which the strategy directs growth to existing built-up areas and supports regeneration and intensification of brownfield land.
- 7.2.7. Given the scale of development proposed, adverse effects have inevitably been identified across several environmental themes. These reflect the pressures associated with accommodating growth, including increased journeys as new homes and businesses are occupied, land take for new development, increased waste and emissions, and the potential for permanent impacts on landscapes, heritage assets and higher-value agricultural soils.
- 7.2.8. The Pre-Submission Local Plan acknowledges that accommodating growth creates tensions with the protection of biodiversity, landscape and cultural heritage, as well as competition for limited land supply. In response, it includes a development management framework that incorporates mitigation and enhancement requirements across the plan, including policies on design quality, environmental protection, the natural environment, sustainable travel, climate change and the safeguarding of heritage and landscape assets. Together, these policies are expected to moderate many of the adverse environmental effects identified through the SA and to secure opportunities for improvement in local environments.
- 7.2.9. Cumulatively, the plan is anticipated to generate positive effects across most social and economic objectives, mixed effects across several environmental objectives and minor negative effects in relation to air, light and noise pollution, flood risk and waste. These cumulative effects reflect the unavoidable pressures associated with accommodating growth in a compact urban area. Negative effects are inherent to plan-making and are not anticipated to be significant and are capable of moderation through national regulations, stakeholder engagement and the wider policy framework.
- 7.2.10. Overall, the appraisal concludes that the Pre-Submission Local Plan represents a balanced and sustainable strategy for the growth of Tamworth to 2043. The plan responds proportionately to the borough's constraints, maximises development within existing urban areas and applies a robust suite of policies to mitigate or moderate adverse effects. Residual negative effects inevitably remain, but many are inherent to plan-making and can be mitigated through national requirements, stakeholder input and the local plan's own policies.

7.3. Recommendations

- 7.3.1. Recommendations for mitigation and enhancement have been provided throughout this report. These will be considered by the Council following consultation on the Pre-Submission Local Plan. Appendix E sets out recommendations made at earlier stages of SA and how they informed preparation of the Plan.

7.4. Monitoring

- 7.4.1. The SEA Regulations require the Council to monitor the significant environmental effects of implementing the Tamworth Borough Local Plan. In line with best practice, monitoring will also consider any wider significant negative or uncertain economic and social effects, ensuring that the Plan's overall outcomes are understood and that any unforeseen adverse effects can be identified and addressed.
- 7.4.2. Appendix H sets out proposed indicators for each SA Objective to support monitoring of the principal sustainability effects associated with the implementation of the local plan. Several of these indicators overlap with those already collected through the Council's annual monitoring processes, enabling information to be collated and reported together.

7.5. Next Steps in the SA Process

- 7.5.1. This report represents the latest stage of the SA process. As per Regulation 13 of 'The Environmental Assessment of Plans and Programmes Regulations 2004', this report is being published for consultation alongside the Pre-Submission Local Plan (Regulation 19). All representations received will be reviewed, and any necessary amendments will be made to the SA and Local Plan.
- 7.5.2. Following consultation, the Local Plan will be submitted to the Secretary of State for Independent Examination.
- 7.5.3. At Examination, the appointed Inspector(s) will consider the soundness of the plan, taking account of the evidence base and the representations made. Where modifications are required to ensure soundness, these will be prepared by the Council, consulted upon, and appraised through the SA process as appropriate.
- 7.5.4. Once the plan is found sound and subsequently adopted, the Council will publish a post-adoption statement in accordance with Stage E of the SA process. This will outline how environmental considerations and consultation responses have been taken into account, as well as measures for monitoring significant effects of the plan.

7.6. How to Comment on this SA Report

We would welcome your views on any aspect of this Sustainability Appraisal Report.

The consultation starts on Monday 24th August 2026 and ends on Monday 5th October 2026. Comments can be returned to the Council:

Via email: developmentplan@tamworth.gov.uk

Via post: Planning Policy and Delivery Team, Tamworth Borough Council, Marmion House, Lichfield Street, Tamworth

All representations must be received by the Council no later than 23.59 on Monday 5th October 2026. Any submissions received after this deadline cannot be considered.