



**Coventry Local Plan 2011-2041
Homes in Multiple Occupation (HMO)
Development Plan Document (DPD)**

**Sustainability Appraisal (SA)
incorporating
Strategic Environmental Assessment (SEA)**

SA Adoption Statement

December 2024

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Coventry Local Plan 2011-2041: Homes in Multiple Occupation (HMOs) DPD

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

SA ADOPTION STATEMENT December 2024

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This SA Adoption Statement

1. Sustainability Appraisal (SA) is a systematic process that must be carried out by a local authority during the preparation of Local Plan documents relating to development – as set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF¹ updated 2023).
2. SA incorporates the requirements for Strategic Environmental Assessment (SEA) that seeks to provide a high level of protection of the environment and to contribute to promoting sustainable development by integrating environmental considerations into the process of preparing certain plans and programmes. The EU Directive was implemented in the UK through the SEA Regulations (2004)² which remain in place since the UK left the EU.
3. The City Council is also required to undertake a Habitats Regulations Assessment (HRA) of the DPD. The HRA process has its own legislative drivers and requirements. Whilst the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel to the SA and its findings have informed the SA.
4. The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations and as guided through Government planning guidance³. This SA Adoption Statement satisfies the SA/SEA requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:
 - (a) *how environmental considerations have been integrated into the plan or programme;*
 - (b) *how the environmental report has been taken into account;*
 - (c) *how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*
 - (d) *how the results of any consultations entered into under regulation 14(4) have been taken into account;*
 - (e) *the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*
 - (f) *the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*
5. SA should demonstrate how the plan has addressed relevant economic, social, and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and,

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

³ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

The Development of the Coventry Homes in Multiple Occupation (HMO) Development Plan Document (to 2041)

6. The overarching development plan document for the Coventry City Council area is the Local Plan (2011 – 2041) that was adopted in December 2017⁴. As set out in its Climate Change Strategy⁵, Coventry City Council is committed to playing its part in the drive to zero carbon while making sure the most vulnerable and at risk from climate change are engaged and supported, and that the opportunities for the green industrial revolution with all the jobs and economic benefits it brings are maximised.
7. In accordance with the Council's adopted Statement of Community Involvement (2012 & updated July 2021)⁶, at each stage of the development of the DPD, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised, and responses prepared, have been documented during the development of the DPD and published on the Council's website⁷.
8. The draft Coventry Net Zero Carbon DPD was submitted to the Secretary of State on 25 August 2023 for independent examination by a Planning Inspector. The examination hearing were held on 23 January 2024⁸. The Inspector advised that certain main modifications (MMs) to the submission DPD would be required to be made for reasons of soundness before the DPD could be adopted. Following additional work, the proposed MMs to the Coventry HMO DPD were published for public consultation between 10 June and 22 July 2024.
9. The Inspector in her final report (4 November 2024) concluded that with the recommended main modifications, the Coventry City Homes in Multiple Occupation Development Plan Document satisfies the requirements of Section 20(5)(a) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

⁴ <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031>

⁵ <https://www.coventry.gov.uk/climatechange/pathway>

⁶ <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/8>

⁷ <https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document>

⁸ HMO Examination documents available at: <https://www.hwa.uk.com/projects/coventry-city-council-hmo-dpd/>

How environmental & sustainability considerations have been integrated into the DPD; How the Sustainability/Environmental Report has been taken into account

10. During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing DPD. The SA was undertaken in accordance with government guidance⁹ which encourages a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. Since 2022, independent specialist consultants were appointed to carry out the SA for the Council. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the DPD.
11. The SA built upon the previous SA work undertaken during the development of the Local Plan – for consistency and correlation. The SA method was refined to be focused on the Homes in Multiple Occupation DPD with relevant sustainability topics and issues. The updated SA scoping identified that some SA Objectives were not relevant for testing the HMO DPD and these were scoped out of the assessment. The opportunity was taken to update the assessments in line with the revised NPPF and the updated requirements for HRA. The scope of the SA was subject to formal and public consultation between 20 September and 15 November 2022.
12. The refined SA Framework was used as the basis for assessing the emerging DPD - and as explained in Section 2 of the submitted SA Report (December 2022). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a framework of SA Objectives and sub-objectives that are relevant to the DPD and the Coventry City Council area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.
13. The SA considered the likely significant effects of the implementation of the DPD on the sustainability objectives for the Coventry City Council area. For each aspect of the DPD, the assessment against the SA Objectives was recorded with a narrative describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium, and long term, permanent, and temporary, positive, and negative, secondary, cumulative, and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported. The SA was informed by best available information to assess the effects of the policies and of the HMO DPD as a whole.

⁹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

14. The SA found that there were several SA objectives for which the HMO policies had only a negligible or neutral effect. There were no significant negative effects found. The HMO DPD as a whole was found to have positive effects for SA objectives on inclusive communities, health and wellbeing, housing, reducing crime, and for meeting local needs locally. Major positive effects were identified for housing as the DPD is responding to an identified need in this particular type of housing and seeking to manage the need more proactively so that likely negative effects can be mitigate.
15. The Council has recognised that sustainability problems have developed in certain areas of Coventry and associated with intensification of HMOs. Such negative effects have been reported on amenity and character, including nuisance noise, overcrowding and highway safety concerns with parking, and odour/health concerns with poor waste management. These likely negative effects have been mitigated through clear policy requirements such that there are no residual negative effects.
16. The SEA Regulations require consideration of reasonable alternatives. The SA tested options for thresholds and concentrations of HMOs at 5% and 10% and 100m an 750m. This is explained and detailed findings presented in section 4 of the submitted SA Report (December 2022). The SA found that there were several SA objectives for which the HMO policies had only a negligible or neutral effect. The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented. The proactive approach to managing housing is likely to have positive effects for all options with regard to communities, health and housing. Retaining the distance to 100m, mitigation is more certain with regard to townscape/landscape and the historic environment.
17. The SA found minor positive effects as the potential for negative effects on nuisance odour or air quality associated with road traffic and waste management has been reduced through limiting HMOs in areas where there are existing sustainability issues. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. By extending the distance out of 750m, the risk of adverse effects on nuisance odour and air quality are increased, less mitigated – and there is uncertainty of any positive effects. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems and confirming likely positive effects.
18. The Council does have the option of not preparing an HMO DPD and continuing with reliance on the existing Coventry Local Plan Policy H11. This do-nothing option was not considered to be a reasonable option since issues that have arisen (associated with visual amenity, traffic and parking, waste, noise and disturbance, anti-social behaviour, weakening of community ties, pressures on services, and reduced housing affordability and choice) are likely to exacerbate if some action is not taken.

19. Thus, relevant alternatives have been tested through the SA process in an iterative way to inform plan-making. The SA reported outline reasons for progressing or rejecting options and in accordance with the requirements of the SEA Regulations. The findings and recommendations of the SA informed plan-making and were integrated into the development of the DPD.
20. The updated Habitats Regulations Assessment (HRA) screening (April 2022) found that the HMO DPD is considered unlikely to have significant effects on any European sites, alone or in-combination with other plans and projects. These findings were incorporated into the SA.
21. Following submissions to the examination and discussions at the hearing, proposed Main Modifications (MMs) to the HMO DPD were prepared and subject to SA. Most amendments are for updating and to provide further clarity and as such are not significant for SA and HRA. These matters were explained and assessed in the SA & HRA Addendum Note (March 2024) accompanying the proposed Main Modifications to the DPD. The MMs were screened and none were identified as potentially significant for SA/SEA nor HRA, and therefore, no further work was necessary. Thus, the previous findings of the SA/SEA remain relevant and valid. It was confirmed that there will be no significant negative effects and that positive effects have been optimised.

How the results of consultation have been taken into account

22. Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the DPD preparation and the SA as follows:

Coventry HMO DPD Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Evidence Gathering & Technical Studies 2022	
Issues & Preferred Option (July 2022) Regulation 18 Consultation: 20 September 2022 to 15 November 2022	SA/SEA Scoping Report & HRA Screening Report (April 2022) Consultation: 20 September – 15 November 2022 Final SA/SEA Scoping Report (December 2022)
Pre-Submission HMO Development Plan Document Regulation 19 Consultation: 27 March – 15 May 2023	Pre-Submission SA Report (December 2022) Consultation: 27 March – 15 May 2023
Submission 25 August 2023 Examination 23 January 2024	Submission 25 August 2023 Examination 23 January 2024
Main Modifications 10 June – 22 July 2024	SA Addendum Note (March 2024) 10 June – 22 July 2024
Local Plan DPD Adoption Q1 2025 (Jan-March)	SA Adoption Statement Q1 2025 (Jan-March)

23. SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and any responses made to issues and concerns raised have been published, including at key statutory stages – SA Scoping and Regulation 19 (Appendix III of submitted SA Report).

Reasons for choosing the DPD as adopted, in the light of other reasonable alternatives

24. The SEA Regulations require assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. The UK Government’s planning practice guidance¹⁰ states that “reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable”.
25. The reason for progressing the HMO DPD rather than the Do-Nothing option is to take a proactive approach and seek to resolve the sustainability problems that have already arisen - associated with visual amenity, traffic and parking, waste, noise and disturbance, anti-social behaviour, weakening of community ties, pressures on services, and reduced housing affordability and choice. Also, to ensure that such issues do not get exacerbated.
26. For the options with regard to concentrations (5% & 10%) and thresholds (100m & 750m) that were tested, the Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. Reducing the concentration threshold to 5% existing HMOs would reduce further negative effects on amenity topics but might risk restricting the number of HMOs supported and progressed with issues for meeting the need for this kind of housing. Extending the radius distance to 750m could risk continued accumulation of HMOs and possible negative effects for amenity and community factors.
27. Therefore, the Council continues to consider that the proposed threshold and concentration of 10% and 100m is suitable and deliverable; it does not restrict the progress of HMO delivery and it provides mitigation to reduce the cumulative negative effects for amenity and communities. Each HMO application will be considered on a case by case approach, and this will include the consideration of the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing.

¹⁰ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Measures that are to be taken to monitor the significant sustainability/environmental effects of the implementation of the DPD

28. The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan.
29. The Coventry HMO DPD includes monitoring of the policies to be included in the Authority Monitoring Report (AMR)¹¹ produced annually. It is considered that the indicators in the AMR relate to the SA indicators and they will be sufficient to identify any unforeseen adverse effects at an early stage and provide information on the predicted effects from the SA. Therefore, no additional proposed monitoring that might be required as part of the SEA process was indicated from the findings of the SA.

¹¹ <https://www.coventry.gov.uk/downloads/download/2678/authority-monitoring-reports>