

Coventry City Council

**Coventry Local Plan
Houses in Multiple Occupancy (HMO)
Development Plan Document (DPD)**

**Sustainability Appraisal (SA)/
Strategic Environmental Assessment (SEA)
Scoping
Habitats Regulations Assessment (HRA)
Screening**

April 2022

Coventry Local Plan 2011-2031 Houses in Multiple Occupancy (HMO) Development Plan Document (DPD)

SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment and Habitats Regulations Assessment Screening)

SA/SEA Scoping & HRA Screening Report: Draft

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CONTENTS

	Page
1 Introduction	1
Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Habitats Regulations Assessment (HRA) The Coventry Houses in Multiple Occupancy (HMO) DPD Purpose and Structure of this SA Scoping Report	
2 Population, Health & Wellbeing	5
Policy Context Baseline Conditions Key sustainability Issues & Objectives	
3 Economy	9
Policy Context Baseline Conditions Key Sustainability Issues & Objectives	
4 Climate Change	10
Policy Context Baseline Conditions Key Sustainability Issues & Objectives	
5 Transport, Air Quality, & Noise	14
Policy Context Baseline Conditions Key Sustainability Issues & Objectives	
6 Land & Water Resources	16
Policy Context Baseline Conditions Key Sustainability Issues & Objectives	
7 Biodiversity	20
Policy Context Baseline Conditions Key Sustainability Issues & Objectives	
8 Historic Environment	23
Policy Context Baseline Conditions Key Sustainability Issues & Objectives	
9 Landscape & Townscape	25
Policy Context Baseline Conditions Key Sustainability Issues & Objectives	
10 SA Framework & Approach	27
11 Habitats Regulations Assessment (HRA)	32
HRA Screening (2016) HRA Screening Updated (2022)	
12 Consultation & Next Steps	34

TABLES

- 10.1: SA Framework
- 10.2: SA Significance Key

FIGURES

- 1.1: SA and Plan-making Stages and Tasks

1.0 INTRODUCTION

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

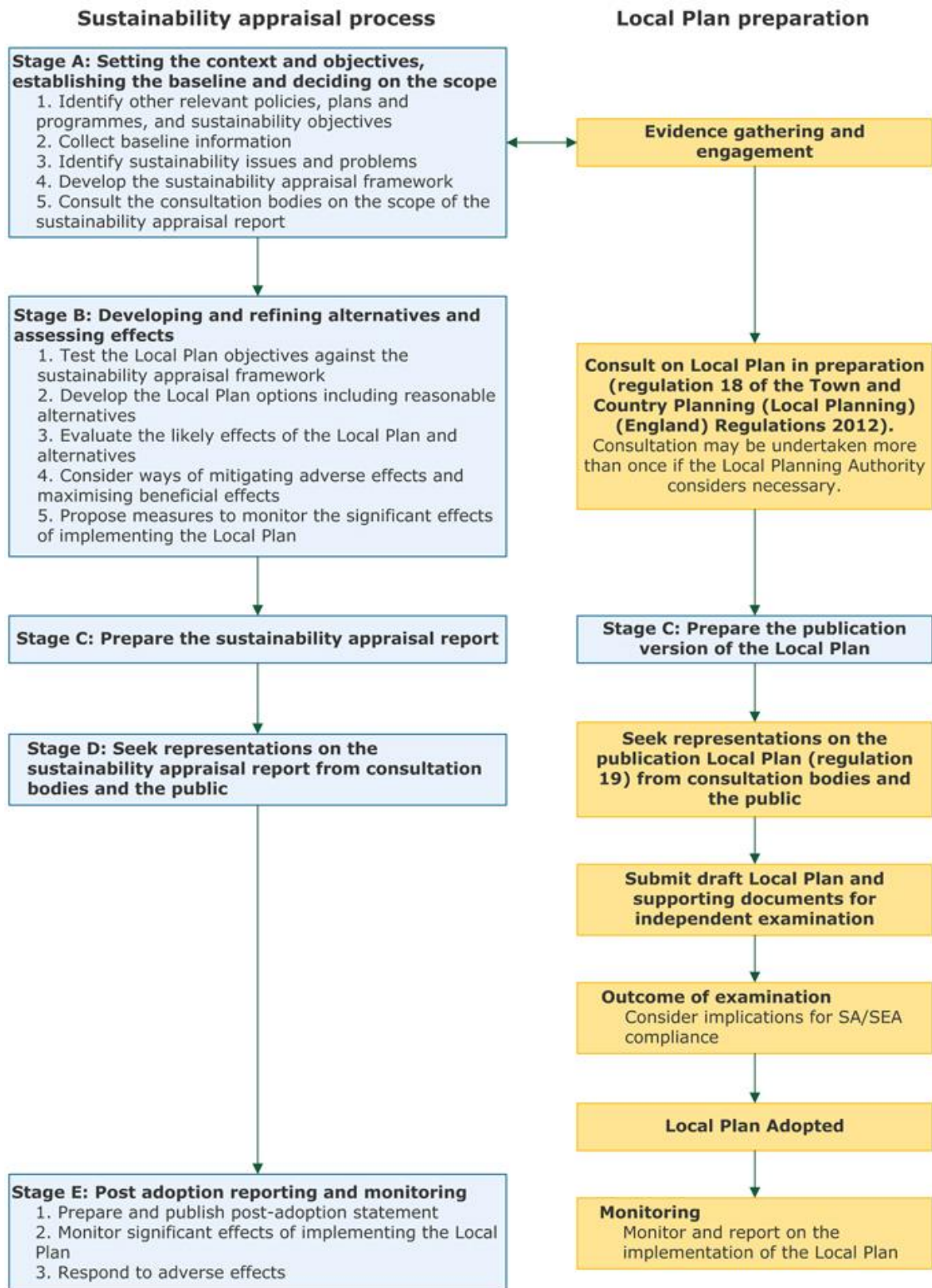
- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives¹.
- 1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF, updated 2021)². SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004³. Coventry City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Coventry Houses in Multiple Occupancy (HMO) Development Plan Document (DPD).
- 1.3 National planning practice guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. These key stages and tasks are applicable to the SA process for Coventry HMO DPD. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.
- 1.4 The scoping stage is the first stage of the SA process, and it aims to identify the scope and level of detail of the information to be included in the SA Report. It sets out the context, objectives, baseline information, and proposed approach for the assessment; it identifies key issues and opportunities to help develop a framework of SA objectives that will form the basis against which the emerging elements of the plan will be assessed.

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

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

³ <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

Figure 1.1: SA and Plan-making Stages and Tasks



Habitats Regulations Assessment (HRA)

- 1.5 Coventry City Council is also required to undertake a Habitats Regulations Assessment (HRA)⁴ of the HMO DPD.⁵ The Conservation of Habitats & Species Regulations (2017, amended 2018)⁶ afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar⁷ sites. It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site. HRA is a two staged process – initially screening and then appropriate assessment (if significant adverse effects are screened as likely). Planning practice guidance advises that an SA should take account of the findings of an appropriate assessment, if one is undertaken.

The Coventry Local Plan (CLP) and the Houses in Multiple Occupancy (HMO) Development Plan Document (DPD)

- 1.6 The Coventry Local Plan 2011-2031 and City Centre Area Action Plan 2011-2031 (CCAAP) (both adopted 2017), together with the NPPF, DPDs, Supplementary Planning Guidance, and Neighbourhood Plans, comprises the planning framework through which decisions are made on planning applications. HMO DPD when adopted will be part of this framework and it will have to be in conformity with the Coventry Local Plan. Policy H11 of the Local Plan focuses upon HMOs. The Coventry Local Plan covers the entire administrative boundary for Coventry City Council. The remit of the plan extends beyond the City Centre boundary to cover an area of 99km² located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa.
- 1.7 The focus for the DPD will be on houses in multiple occupancy and will be produced in tandem with an Article 4 Direction that will remove Permitted development rights in relation to HMOs. currently, planning permission is not needed to change the use of a house to an HMO with 3-5 residents. Although the Council will be commencing the review of its Local Plan later this year, it wishes to produce a stand-alone HMO DPD as it is facing particular issues with HMOs that need to be addressed to a faster timescale than would be achievable with local plan review. An HMO DPD will provide the policy basis to support the Article 4 direction but will also bring forward the review of Policy H11 in advance of the local plan review.
- 1.8 HMOs can cause significant issues for neighbours and the wider community including general anti-social behaviour, weakening of community cohesion, noise, disturbance, and waste management. However, HMOs also provide a significant element towards meeting the city's housing needs. HMOs can provide an affordable housing option for young professionals and graduates

⁴ <https://www.gov.uk/guidance/appropriate-assessment>

⁵ <https://www.gov.uk/guidance/appropriate-assessment>

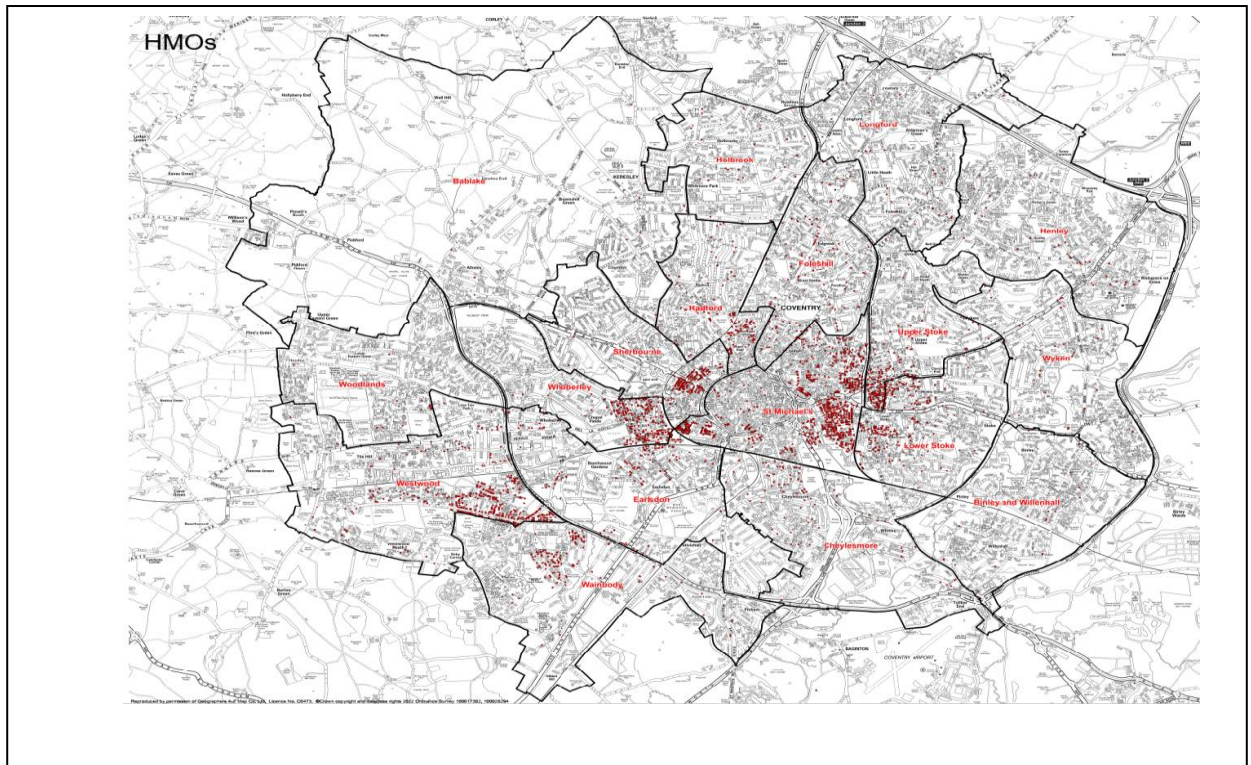
⁶ <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

⁷ Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance

and a first foot on the housing ladder for many of the city's young people in general.

- 1.9 During their preparation, the emerging Coventry Local Plan and the City Centre Area Action Plan were subject to SA⁸ and HRA.

Figure 1.2: Location of the Coventry HMO DPD



Purpose and Structure of this SA Scoping Report

- 1.10 This document reports the scoping stage of the SA process and HRA screening stage for the Coventry HMO DPD. This SA draws upon the earlier SA/HRA work, updating and building upon the previous SA/SEA/HRA of the adopted Local Plan for consistency and correlation. A pragmatic and proportionate approach has been taken to the scoping process, whilst still demonstrating compliance with SEA regulations and planning policy guidance. This is in consideration of the limited scope and scale of the likely proposed development to be determined through the HMO DPD, and the position of the DPD in the planning policy hierarchy.
- 1.11 Following this introductory Section 1, this report is structured into further sections:
- Sections 2-9 consider the policy context, baseline conditions, and key sustainability issues and objectives for the key topics relevant to the HMO DPD and SA/SEA

⁸ <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/3>

- Section 10 outlines the approach to the SA, including consideration of reasonable alternatives, the proposed SA Framework, and likely contents of the SA report
- Section 11 presents the HRA screening assessment
- Section 12 explains the consultation and next steps

2.0 POPULATION, HEALTH & WELLBEING

Policy Context

National

- 2.1 The **National Planning Policy Framework** (NPPF, updated 2021)⁹ has an overarching objective “to support strong, vibrant and healthy communities...” Paragraph 92 requires planning policies to aim to achieve healthy, inclusive and safe places that “*promote interaction*”, *are safe and accessible*, and “*enable and support healthy lifestyles*”.
- 2.2 The **Public Health Strategy England 2020-2025**¹⁰ aims to protect and improve health and reduce health inequalities. **Healthy people, healthy places: building a health future** (PHE, 2013)¹¹ sets out the priority of Public Health England to improve the nation’s health through better planning and design to reduce the impact of a poor physical and natural environment.
- 2.3 The **Environment Act 2021**¹² will set statutory targets for recovery of the natural world in four priority areas: air quality, water, biodiversity, resource efficiency and waste management. The Environmental Improvement Plan **A Green Future: Our 25 Plan** (2018)¹³ embeds the principle of environmental gain for development. It includes policies for connecting people with the environment to improve their health and wellbeing.
- 2.4 **Public Health England (PHE) Health Impact Assessment in Spatial Planning** (2020)¹⁴ provides a guide for local authority public health and planning teams setting out process and practice with regard to the wider determinants of health and wellbeing for plan-making and the planning application process.

Local

- 2.5 The **Coventry Health and Wellbeing Strategy 2019-2023**¹⁵ has aims, as follows:
- *People are healthier and independent for longer*
 - *Children and young people fulfil their potential*
 - *People live in connected, safe and sustainable communities*

The importance of taking a partnership approach to tackling health inequalities is embedded in this Strategy. Coventry became a **Marmot City**¹⁶

⁹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁰ <https://www.gov.uk/government/publications/phe-strategy-2020-to-2025>

¹¹ <https://www.gov.uk/government/news/healthy-people-healthy-places-building-a-healthy-future>

¹² <https://bills.parliament.uk/bills/2593>

¹³ <https://www.gov.uk/government/publications/25-year-environment-plan>

¹⁴ <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

¹⁵ <https://www.coventry.gov.uk/downloads/file/31238/coventry-health-and-wellbeing-strategy-2019-2023>

¹⁶ <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

in 2013 and is committed to reducing inequality and improving health outcomes for all. In 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on BAME communities.

- 2.6 The **Coventry Local Plan** includes overall objectives to "*Improve the health and wellbeing of local residents*" and to "*Support safer communities*". It includes policies that directly relate to health and wellbeing, as follows:

Policy DS3 Sustainable Development includes a requirement for development proposals that improve "*health, wellbeing and quality of life*".

Policy HW1 Health Impact Assessment (HIAs) requires that all major development proposals should demonstrate that they will have an acceptable impact on health and wellbeing.

Policy AC1 Accessible Transport Network promotes a sustainable, integrated and accessible network, including a choice of transport modes.

Policy AC4 Walking and Cycling requires development to incorporate appropriate, safe, and convenient walking and cycling routes.

Policy EM1 Planning for Climate Change requires all development to be designed to be resilient to, and adapt to, the future impacts of climate change.

Policy EM2 Building Standards guides new development for design and construction to maximise resource efficiencies and minimise wastes.

Policy EM3 Renewable Energy Generation encourages renewable and low carbon energy schemes.

Policy EM6 Redevelopment of Previously Developed Land promotes efficient use of land whilst ensuring no negative impacts on water quality and resources.

Policies H1-H11 Housing address the CLP objective to provide the right quality of housing that meets the needs of all people.

Policy DE1 Ensuring High Quality Design requires that all development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area. The policy sets out all the factors that can contribute to high design.

- 2.7 The **City Centre AAP** further guides development with relevant policies, as follows:

Policy CC3 Building Design sets out criteria to be integrated into the design process.

Policy CC10 Environmental Management requires all new development to minimise environmental impact and ensure that any pollution impacts are appropriately considered and mitigated. The policy includes requirements for a Construction Environmental Management Plan (CEMP) and considers renewable energy, ground contamination, risks, noise, and odour.

- 2.8 The **Coventry City Council Affordable Housing Supplementary Planning Document (SPD)** (March 2022)¹⁷ provides more detailed guidance for CLP Policy H6 Affordable Housing., aiming to make it easier for affordable homes

¹⁷ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

to be built, thus increasing the number of affordable homes delivered in the city.

- 2.9 The **Health Impact Assessment (HIA) Supplementary Planning Document (SPD)**¹⁸ provides information and guidance on completing the relevant health toolkit and HIA. Under Policy HW1 of the CLP, the Council requires applicants to mitigate against potentially negative health impacts. An HIA is a tool that is used to identify these impacts (and their potential severity) and to inform design of a development during the decision-making process.

Baseline Conditions: Population

- 2.10 The total population of Coventry City Council (2020)¹⁹ was 379,387 of which 193,290 was male and 186,097 was female with 72,983 under age 16, 62,108 aged 16-24, and 193,833 aged 25-64. This illustrates a high number of young people aged 20-24. According to the 2011 census, the majority (66.6%) of Coventry's total population is White British, such that Coventry has a notably higher percentage of black & minor ethnic (BME) compared to the regional and national averages.

Baseline Conditions: Health & Wellbeing

- 2.11 Coventry City Council (2020)²⁰ information reports that Healthy Life Expectancy (HLE) at birth is 64.2 for females and 61.9 years for males and this compares to national data of 63.5 for females and 63.2 years for males. HLE is the average number of years that an individual is expected to live in a state of self-assessed good or very good health, based on current mortality rates and prevalence of good or very good health.
- 2.12 The Index of Multiple deprivation (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation – Income; Employment; Education; Skills & Training; Health & Disability; Crime; Barriers to Housing Services and Living Environment. The data (2019)²¹ for Coventry City indicate a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west.
- 2.13 There are complexities of planning for health due to the multiple determinants and the need for cross-sectoral understanding and collaboration with linkages between the global ecosystem, the natural and built environments, the local economy with communities, people, and their lifestyles. The complexities of investigating health impacts are recognised by Public Health England (PHE) and the Wider Determinants of Health tool²² is an ongoing project that provides resources for categories of factors that affect health, as follows: built and

¹⁸ <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

¹⁹ <https://www.coventry.gov.uk/facts-coventry/population-demographics>

²⁰ <https://www.coventry.gov.uk/facts-coventry/population-demographics>

²¹ <https://coventry-city-council.github.io/imd/2019/>

²² <https://fingertips.phe.org.uk/profile/wider-determinants>

natural environment; work and the labour market; vulnerability; income; crime; education

Key Sustainability Issues & Objectives

- 2.14 The key issues identified during the preparation of the CLP were to meet the locally identified need for housing, including the need to maintain a mix of new homes and to improve the quality of the existing stock, to address the imbalance in the distribution of affordable housing, to consider appropriate densities for locational character, student accommodation, and houses in multiple occupation. These issues for plan-making remain valid. For example, in 2020/21²³ the delivery of affordable housing was below the annualised need (although an increase in percentage from 7 to 13 % on 2019/20).
- 2.15 Therefore, the previous SA Objectives remain valid and relevant:
- SA No 5 Provide decent and affordable housing for all**, of the right quantity, type, tenure, and affordability for local needs
 - SA No 10 Promote a high-quality built environment** by improving design and layout and encourage local distinctiveness and stewardship of local environments
 - SA No 17 To meet local needs locally**
 - SA No 1 Improve accessibility to and use of basic services and amenities** to all residents
 - SA No 2 Enable vibrant and inclusive communities** that participate in decision-making
- 2.16 Improving health and reducing inequalities in health and wellbeing continue to be national and local aims such that the previous SA Objectives remain valid and relevant:
- SA No 3 Reduce social exclusion and poverty**
 - SA No 4 Improve health, reduce health inequalities, and promote active living**
 - SA No 6 Reduce crime, disorder, and fear of crime**
 - SA No 7 To encourage increased cultural and recreational activities** across all sectors of the community
- 2.17 HMOs provide a vital role in meeting the need for decent and affordable accommodation for a wide range of residents, from students to low paid workers and professionals, and including helping the young people that make up a significant proportion of the demography of the Coventry area. HMOs should be of adequate size, with sufficient space to live, reasonable levels of washing, cooking, and sanitary facilities, and be well managed so that they may be integrated fairly into existing communities. There is anecdotal and perceived evidence that some HMOs can generate issues for disturbance and community identity.

²³ <https://www.coventry.gov.uk/downloads/file/37391/authority-monitoring-report-2020-2021>

3.0 ECONOMY

- 3.1 The provision of good quality and accessible jobs is acknowledged to be a factor in social and health outcomes for people and their communities. The Marmot review, published in 2010, raised the profile of wider determinants of health by emphasising the strong and persistent link between social inequalities and disparities in health outcomes. These wider determinants²⁴ may be categorised into six themes that include Work and the Labour Market, and Education.
- 3.2 The previous SA Objectives included **SA No 18 To improve Coventry's economy** through developing a successful and diverse modern economy, and **SA No 19 To ensure access to good quality employment opportunities** for all. It may be considered that there is a need to ensure sufficient, good quality, and affordable accommodation for people in the Coventry area to help sustain local employment. However, this is covered by the Coventry Local Plan and the Coventry City Centre AAP. It is not directly relevant to the HMO DPD that is focused on housing in multiple occupancy. Therefore, these two SA Objectives are not relevant, and it is proposed to scope them out of the assessment.
- 3.3 The previous SA Objectives included **SA No 20 Good education and training opportunities** for all. It is proposed to scope this SA Objective out of the assessment as it is not relevant to the HMO DPD.

²⁴ <https://fingertips.phe.org.uk/profile/wider-determinants>

4.0 CLIMATE CHANGE

Policy Context

National

- 4.1 The **National Planning Policy Framework** includes an overarching objective for “...mitigating and adapting to climate change, including moving to a low carbon economy.” Section 14 sets out that “the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”
- 4.2 Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.
- 4.3 **Climate Change Act** (2008)²⁵ sets targets for UK greenhouse gas emission reductions of at least 100% by 2050 and CO2 emission reductions of at least 26% by 2015, against a 1990 baseline (in 2008 the target was set at 80% and the target was recently amended in 2019 by Statutory Instrument No.1056 to 100%).
- 4.4 **UK Net Zero Strategy: Build Back Greener** (2021) sets out approaches to keep the UK on the path to achieving net zero carbon by 2050. It builds on existing policies and supports Government’s commitment to decarbonise the UK’s electricity system by 2035. It introduces Regulations from 2025 through the Future Homes Standard to ensure all new homes in England are ready for net zero by having a high standard of energy efficiency and low carbon heating installed.
- 4.5 The **Heat and Buildings Strategy** (2021)²⁶ sets out how the UK will decarbonise our homes, and our commercial, industrial and public sector buildings, as part of a path to net zero by 2050. The **Future Homes Standard**: consultation on changes to Part L and Part F of the Building Regulations for new dwellings (2021)²⁷.
- 4.6 **UK Climate Change Risk Assessment & Adaptation Programme** is a 5 yearly assessment and reporting of major risks and opportunities from climate change. UK Committee on Climate Change Reducing UK emissions – 2021

²⁵ <https://www.legislation.gov.uk/ukpga/2008/27/contents>

²⁶ <https://www.gov.uk/government/publications/heat-and-buildings-strategy>

²⁷ <https://www.gov.uk/government/consultations/the-future-buildings-standard>

Progress Report²⁸ with priority recommendations for progressing to net-zero emissions by 2050, including to increase resources for local government.

- 4.7 **Flood and Water Management Act (2010)**²⁹ sets out measures to ensure that flooding from all sources of flooding is managed more effectively. **Flood and Coastal Erosion Risk Management Strategy for England (2011)**³⁰ sets out national framework for understanding the risks, empowering communities, and building resilience. Coventry is located within the Avon Warwickshire management catchment of the **Severn River Basin District** with the most recent draft river basin management plan at consultation (2021)³¹. The **Severn River Basin District Flood Risk Management Plan (2015-2021)**³² determines the risk of flooding from rivers, the sea, surface water, groundwater, and reservoirs in the area.
- 4.8 **Environment Act (2021)**³³ provides for a cleaner, greener, and more resilient country for the next generation.

Local

- 4.9 **Warwickshire Energy Plan (2019)**³⁴ aims to increase the use of low and zero carbon technologies, increase public support for low and zero carbon technologies, and take people out of fuel poverty to improve their health and wellbeing.
- 4.10 **Coventry Climate Change Strategy**³⁵ (2021-2020) is currently under review to reflect current UK and global policy and the urgency of the climate crisis. Coventry City Council declared a **climate change emergency (2019)** and has pledged to reach net zero carbon emissions before the government's target of 2050.
- 4.11 **Warwickshire Local Flood Risk Management Strategy & Surface Water Management Plan (2016)** outlines prioritised list of flooding locations for more effective management.
- 4.12 The **Coventry Local Plan** recognises the role of planning for adapting to the impacts of climate change and the following policies are relevant:

Policy DS3 Sustainable Development
Policy DS4 General Masterplan principles
Policy GE1 Green Infrastructure

²⁸ <https://www.theccc.org.uk/wp-content/uploads/2021/06/CCC-Joint-Recommendations-2021-Report-to-Parliament.pdf>

²⁹ <https://www.legislation.gov.uk/ukpga/2010/29/contents>

³⁰ <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england-2>

³¹ <https://environment.data.gov.uk/catchment-planning/v/c3-draft-plan/RiverBasinDistrict/9>

³² <https://www.gov.uk/government/publications/severn-river-basin-district-flood-risk-management-plan>

³³ <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

³⁴ <https://www.warwickshire.gov.uk/energystrategyandpolicy>

³⁵ <https://www.coventry.gov.uk/home-energy-warmth/tackling-climate-change/2>

Policy DE1 Ensuring High Quality Design requires new development to be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of design, layout, and density.

Policy EM1 Planning for Climate Change Adaptation requires all development to be designed to be resilient to and adapt to the future impacts of climate change.

Policy EM2 Building Standards requires development to comply with the relevant standards

Policy EM3 Renewable Energy Generation promotes and encourages renewable and low carbon technologies

Policy EM4 Flood Risk Management

Policy EM5 Sustainable Drainage Systems (SuDS)

- 4.13 The **Coventry City Centre AAP** sets out policies that further guide development, as follows:

Policy CC9 Drainage & Flood Risk requires development to be design and located to minimise the risk of flooding and if permitted development, to be resilient to flooding.

- 4.14 The **Coventry City Council Energy Supplementary Planning Document (SPD)** (March 2022)³⁶ aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance and requirements to improve the environmental sustainability of new development.

Baseline Conditions

- 4.14 Coventry was one of the first cities to produce a Climate Change Strategy in 2012 with a target to reduce carbon dioxide emissions by 27.5% by the year 2020. Coventry achieved this in 2014 – six years early. The Strategy is currently under review and will set targets to reflect the current urgency of the climate crisis that is recognised by the City Council. 47% of all UK CO₂ emissions are linked to the construction and operation of buildings – both housing and commercial. Energy efficient buildings produce less CO₂ emissions, are warmer, and are cheaper to run.
- 4.15 The Coventry Flood Maps provide information on flooding risk including flood incidents, areas subject to surfacewater and groundwater flooding, future flood risk areas, and areas above the flood risk threshold.

Key Sustainability Issues & Objectives

- 4.16 The key issues identified during the preparation of the CLP were to ensure that planning for climate change adaption should be a part of every development. Whilst carbon emissions have fallen, the Council recognises the climate crisis and is currently reviewing its Climate Change Strategy. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.

³⁶ <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

4.17 Therefore, the previous SA Objective remain valid and relevant:

- **SA No 13 To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources**

4.18 SA No 12 Minimise and manage the risk of flooding and the impacts of climate change focuses on flood risk and the use of sustainable urban drainage. It is considered that there is sufficient national and local policy to manage and control flood risk and the associated impacts for climate change such that this SA objective may be scoped out of the SA of the HMO DPD.

5 TRANSPORT, AIR QUALITY & NOISE

Policy Context

National

- 5.1 The **National Planning Policy Framework** requires that the planning system should actively manage patterns of growth to support objectives including promotion of walking, cycling, and public transport, and for net environmental gains through assessment of the environmental impacts of traffic and transport infrastructure.
- 5.2 The **UK Air Quality Strategy** (2011)³⁷ sets out air quality objectives and policy options to improve air quality into the long term. **The Road to Zero** (2018)³⁸ sets out measures towards cleaner road transport aiming for all new cars and vans to be effectively zero emission by 2040. **A Green Future: Our 25 Year Plan to Improve the Environment** (2018, updated 2021)³⁹ includes actions to reduce pollution by tackling air pollution. **Clean air Strategy**⁴⁰ (2019) recognises that vehicles are not the only source of harmful emissions and aims for better cleaner technology and changes in behaviour. Local powers support the creation of Clean Air Zones to lower emissions from all sources of air pollution.

Local

- 5.3 **Warwickshire Local Transport Plan 2011-2026**⁴¹ sets out how the transport network will be managed, maintained, and improved.
- 5.4 **Coventry Transport Strategy**⁴² (consultation draft 2021) includes planned improvements to the city's public transport networks, cycling infrastructure, and road network. the overall purpose of the strategy is to offer a safe, sustainable, equitable and resilient transport system.
- 5.5 The **Coventry Local Plan** seeks to encourage a sustainable, integrated, and accessible transport network with relevant policies, as follows:

Policy AC1 Accessible Transport Network requires integration with a choice of modes, considering the needs of everyone with special attention to the needs of disabled, young, and older people.

Policy AC4 Walking and Cycling expects development to incorporate appropriate safe and convenient access to walking and cycling routes.

³⁷ <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england-scotland-wales-and-northern-ireland-volume-1>

³⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

³⁹ <https://www.gov.uk/government/publications/25-year-environment-plan>

⁴⁰ <https://www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019>

⁴¹ <https://api.warwickshire.gov.uk/documents/WCCC-630-116>

⁴² <https://www.coventry.gov.uk/transport-strategy-2/transport-strategy>

Policy AC5 Bus and Rapid Transit

Policy AC6 Rail

Policy H3 Provision of New Housing requires that residential development should have safe and appropriate access, and be safe from environmental pollutants, excessive noise and air quality issues.

Policy EM7 Air Quality requires that major development schemes should promote a shift to the use of sustainable low emission transport.

- 5.6 The City Centre AAP further guides development with relevant policies, as follows:

Policy CC11 Accessibility requires development proposals to incorporate improvements to the significant routes and linkages, and they should also support the needs of pedestrians and cyclists by incorporating new dedicated safe and direct pedestrian and cycle routes.

Policy CC10 Environmental Management requires new development to minimise environmental impact and ensure that any impacts of pollution are mitigated – including for noise and odour.

- 5.7 Coventry City Council **Air Quality Supplementary Planning Guidance** (2019)⁴³, developed in cooperation with other neighbouring authorities, aims to ensure that mitigation is incorporated at the design stage and that the cumulative effects of aggregated developments are addressed.

Baseline Conditions

- 5.8 A Coventry City-Wide AQMA was declared⁴⁴ for nitrogen dioxide in 2009 and emissions from road transport are the principal source of NO₂. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO₂ standard. For the most recent reported information⁴⁵ in 2019, whilst monitoring locations around the city remain good with annual mean levels of NO₂ < 30ug/m³, the city centre area records annual mean concentrations of NO₂ between 30 and 39.9 ug/m³, and some at 40 ug/m³ and above (above the national air quality objective). The LAQM annual status report⁴⁶ 2020 advises that there is a general decline in levels of nitrogen dioxide and that levels of particulates – PM₁₀ – do not exceed national standards. The main concern remains associated with the major arterial routes with high levels of queuing traffic contributing vehicle emissions.

Key Sustainability Issues & Objectives

- 5.9 Key issues identified during the preparation of the CLP included improving the sustainability of the transport system, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. Reducing vehicle emissions will improve air quality. Noise is a common

⁴³ https://www.coventry.gov.uk/downloads/download/5199/air_quality_supplementary_planning_document_spd

⁴⁴ https://uk-air.defra.gov.uk/aqma/details?aqma_ref=625

⁴⁵ <https://www.coventry.gov.uk/pollution-1/air-quality/3>

⁴⁶ <https://www.coventry.gov.uk/downloads/file/36081/2020-air-quality-annual-status-report-asr->

problem arising from transport, and studies have shown it can have major negative direct and indirect effects on health and well-being and on quality of life.

5.10 Therefore, the previous SA Objectives remain valid and relevant:

SA No 11 Enhance quality and minimise air, soil, water, light and noise pollution levels

SA No 15 To reduce travel by car and air

Whilst CLP Policies AC4 and EM7, and CCAAP Policies CC10 and CC11 provide guidance for development proposals, there may be specific issues and opportunities associated with HMOs such that SA Nos 11 and 15 are scoped into the SA framework. For example, the location of proposed HMOs may be or may not be near to sustainable transport routes. There is anecdotal and perceived evidence that some HMOs can generate issues for nuisance light and noise pollution.

6 LAND & WATER RESOURCES

Policy Context

National

- 6.1 The **National Planning Policy Framework** requires that planning should contribute to and enhance the natural and local environment, including soils (in a manner commensurate with their statutory status or identified quality). New and existing development should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality. Since minerals are a finite natural resource and can only be worked where they are found, the NPPF requires best use to be made to secure their long-term conservation.
- 6.2 Safeguarding our **Soils – A Strategy for England**⁴⁷ (2011) sets out the valuable functions of soils including nutrient recycling, water regulation, carbon storage, support for biodiversity, and providing a platform for food and fibre production and infrastructure.
- 6.3 **UK Minerals Strategy**⁴⁸ (2018) explains the importance of the link between the need for more and better housing and infrastructure and the raw material supply chain that enables them to be delivered.
- 6.4 **Water Strategy for England**⁴⁹ (2011) sets out plans for the water cycle as a whole to 2030.
- 6.5 **Resources and Waste Strategy for England**⁵⁰ (2018) sets out how the government aims to preserve our stock of material resources by minimising waste, promoting resource efficiency, and moving towards a circular economy.
- 6.6 **A Green Future: Our 25 Year Plan to Improve the Environment**⁵¹ (2018): Sets out goals for improving the environment within the next 25 years; chapter 4 focuses on increasing resource efficiency and reducing pollution and waste.

⁴⁷ <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

⁴⁸ https://ukmineralsforum.org.uk/downloads/UK_Minerals_Strategy_2018.pdf

⁴⁹ <https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england>

⁵⁰ <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

⁵¹ <https://www.gov.uk/government/publications/25-year-environment-plan>

Local

- 6.7 **Coventry Contaminated Land Strategy**⁵² (2012) aims to identify land that may be contaminated and takes steps to ensure that the contamination does not have a significant effects on people or the environment.
- 6.8 **Warwickshire County Council Minerals Plan**⁵³ (2018) includes proposed sites for sand/gravel to support Coventry's development needs.
- 6.9 **Coventry Waste Strategy**⁵⁴ (2008-2020) is focused on effective resource management aiming for reduce, reuse, building upon recycling and composting, and ensuring sufficient residual waste treatment infrastructure.
- 6.10 **Severn Trent Water Resource Management Plan** (2019)⁵⁵ sets out how water supplies will be provided over the next 25 years. **Severn draft River Basin Management Plan**⁵⁶ (2021) identifies challenges including biodiversity crisis, changes to water levels and flows, climate change, and pollution.
- 6.11 The **Coventry Local Plan** protects natural resources of land and water through policies, as follows:

Policy EM9 Safeguarding Mineral Resources includes the extent of Minerals Safeguarding Areas (MSAs)

Policy EM10 Non Mineral Development in Mineral Safeguarding Areas

Policy EM6 Redevelopment of Previously Developed Land sets out requirements to ensure that development proposals do not have negative impacts on directly on water quality or indirectly through the treatment of wastewater, nor on groundwater resources. the required wastewater infrastructure must be in place in sufficient time.

Policy EM1 Planning for Climate Change Adaptation includes a requirement for all development to incorporate water efficiency measures such as the use of grey water and rainwater recycling, low water use sanitary equipment.

EM2 Building Standards includes requirements for conserving water, minimising waste and maximising recycling

Policy EM8 Waste Management encourages less consumption of raw materials and requires development to incorporate adequate storage for waste and recycling along with safe access for collection vehicles. Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.

⁵² <https://www.coventry.gov.uk/downloads/file/9440/contaminated-land-inspection-strategy-2012-2016>

⁵³ <https://democracy.stratford.gov.uk/documents/b9943/WCC%20Minerals%20Plan%20Pre-submission%202018%2014th-Jan-2019%2015.30%20The%20Cabinet.pdf?T=9>

⁵⁴ <https://www.coventry.gov.uk/downloads/file/3662/waste-strategy-2008-2020>

⁵⁵ <https://www.severntrent.com/about-us/future-plans/water-resource-management/water-resource-management-plan/>

⁵⁶ <https://www.gov.uk/government/publications/severn-draft-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales/severn-draft-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales#severn-river-basin-management-plan>

- 6.12 The City Centre AAP further guides development with relevant policies, as follows:

Policy CC8 Green and Blue Infrastructure
Policy CC10 Environmental Management

Baseline Conditions

- 6.13 Historically coal mining has been a dominant industry in Coventry but there are now no active working collieries in the area. Sand and gravel are required for minerals planning. In the English part of the Severn River Basin District, the majority of water bodies have an objective of good ecological status. For many of the water bodies, there is low confidence of meeting their objective by 2027. Pollution from wastewater remains one of the main reasons why waters are not in a good enough state. Around 92% of residual municipal solid waste from the Coventry area is incinerated within an Energy from Waste facility and this heats eight major buildings in the city centre.

Key Sustainability Issues & Objectives

- 6.14 Key issues identified during the preparation of the CLP for minimising the use of water and minerals as natural resources remain; the need to reduce waste and reuse/recycle also remains. Whilst CLP and CCAAP policies provide protection for the use of natural resources, the **SA No 14 To minimise use of water, minerals and other natural resources** is still valid and may have relevance for the assessment of the HMO DPD. **SA No 16 To reduce pollution and waste generation and increase levels of reuse and recycling** remains valid and relevant. There is anecdotal and perceived evidence that some HMOs can generate issues for waste management.

7 BIODIVERSITY

Policy Context

National

- 7.1 The **National Planning Policy Framework** (NPPF, updated 2021)⁵⁷ requires that planning policies should contribute to and enhance the natural and local environment by "...*minimising impacts on and providing net gains for biodiversity, including by establish coherent ecological networks that are more resilient to current and future pressures;*" Plans should "*Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.*" Plans should also "*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*".
- 7.2 **Environment Act 2021**⁵⁸ will set statutory targets for recovery of the natural world in four priority areas: air quality, **biodiversity**, water, and waste, and includes a new target to reverse the decline in species abundance by the end of 2030. It establishes Local Nature Recovery Strategies and a new system for biodiversity net gain from development projects.
- 7.3 **Biodiversity 2020: A Strategy for England's wildlife and ecosystem services**⁵⁹ sets out the strategic direction for biodiversity policy for the next decade on land, including rivers and lakes, and at sea. It requires a halt to loss of biodiversity, support for healthy ecosystems, and establishment of ecological networks.

Local

- 7.4 The Coventry Local Plan includes policies that relate directly to biodiversity, as follows:

Policy GE1 Green Infrastructure requires new development to contribute to improvements in biodiversity

Policy GE2 Green Space focuses on protecting green space with value for amenity, recreation, outdoor sports and/or community use recognising that such space often has biodiversity value to.

⁵⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵⁸ <https://bills.parliament.uk/bills/2593>

⁵⁹ <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

Policy GE3 Biodiversity, Geological, Landscape and Archaeological Conservation requires that negative impacts should be avoided, and that development should protect or enhance biodiversity assets and lead to a net gain in biodiversity

Policy GE4 Tree Protection requires no unacceptable loss or damage to trees

Policy DE1 Ensuring High Quality Design requires new development to conserve, restore, or enhance biodiversity

Policy EM2 Building Standards requires incorporation of measures to enhance biodiversity value

- 7.5 The **Coventry City Centre Area Action Plan** (2011-2031, adopted 2017)⁶⁰ covers the natural environment in section 13 and provides some explanation of biodiversity within green and blue infrastructure, referring to local biodiversity networks and the application of soft landscaping, including tree planting.

Baseline Conditions

- 7.6 There are no internationally designated nature conservation sites (European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar sites) located within 20 km of the Coventry city centre – with the exception of Ensor's Pool SAC approximately 7.4 km to the north of the local plan boundary⁶¹. The Ensor's Pool SAC is somewhat isolated as an abandoned claypit and is designated for the presence of the white-clawed crayfish. The site is vulnerable to pollution, changes in water levels and vegetation, disturbance, and the introduction of non-native species. The updated HRA screening confirmed that there are no likely significant effects from the DPD, alone or in-combination, on the integrity of this SAC.
- 7.7 The Coventry local plan area contains 2 Sites of Special Scientific Interest (SSSIs) - Herald Way Marsh to the south-east and Tilehill Wood to the west – and a further site Combe Pool SSSI partly adjacent and outside of the western boundary. There are 16 Local Nature Reserves (LNRs), and 21 designated areas of ancient woodland. The Warwickshire, Coventry & Solihull Local Biodiversity Plan (LBAP)⁶² comprises 52 action plans for species and habitats, ranging from wetlands and woodlands to urban and rural settlements.

Key Sustainability Issues & Objectives

- 7.8 The Coventry area contains, and is in close proximity to, a number of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national importance. Both SSSIs within the country boundary are in a favourable condition whilst Combe Pool SSSI is in unfavourable recovering condition⁶³. The overall ecological network is also important for biodiversity helping to support the condition of designated sites

⁶⁰ https://www.coventry.gov.uk/downloads/file/25900/final_aap_december_2017

⁶¹ <https://magic.defra.gov.uk/magicmap.aspx>

⁶² <https://www.warwickshirewildlifetrust.org.uk/LBAP>

⁶³ <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

and also enabling species to migrate in response to climate change. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area.

- 7.9 Therefore, the previous **SA Objective No 9 To protect and enhance biodiversity** remains valid and relevant. However, Policies GE1-4, DE1, and EM2 in the CLP are sufficient to progress these objectives for biodiversity and thus the effects of the HMO DPD are likely to be negligible, taking into account the limited scope and scale of the DPD, such that SA No 9 Biodiversity is likely to be not applicable with neutral or no impact and is thus scoped out of the assessment.

8 HISTORIC ENVIRONMENT

Policy Context

National

- 8.1 The **National Planning Policy Framework** contains an overarching environmental objective to protect and enhance our natural, built and historic environment. Section 16 focuses on conserving and enhancing the historic environment.
- 8.2 **Statement on the Historic Environment for England**⁶⁴ (2010) sets out that the value of the historic environment is recognised and that it is managed in such a way that fully realises its contribution to the economic, social and cultural life of the nation.
- 8.3 **Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note** ⁸⁶⁵ (2016) - sets out guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the SA/SEA process.

Local

- 8.4 The **Coventry Local Plan** includes policies that relate directly to the historic environment, as follows:
- Policy DE1 Ensuring High Quality Design** includes that all development should "*preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment*".
- Policy HE1 Conservation Areas**
- Policy HE2 Conservation and Heritage Assets** sets out that "*development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance.*"
- 8.5 The **Coventry City Centre AAP Development Strategy Policy CC1** includes an overarching requirement for "*Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment.*" The CCAAP provides further details on historical assets and settings in each of the characteristic areas of the city centre.

⁶⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/229834/Acc_HeritageVision_Part1.pdf

⁶⁵ <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

Baseline Conditions

- 8.6 Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Coventry has over 400 Listed Buildings of national importance, together with over 280 buildings selected by the Council for Local Listing. The city has 16 Conservation Areas⁶⁶, 20 Scheduled Monuments 4 Registered Parks and Gardens, and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record⁶⁷. The Coventry Historic Landscape study⁶⁸ (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council.

Key Sustainability Issues & Objectives

- 8.7 The issues and opportunities for protecting and enhancing the historic environment remain. Whilst key CLP Policies DE1 and HE1-2 and CCAAP Policy CC1 provide strong guidance for development, there may still be localised issues/opportunities relating to HMOs and therefore, it is proposed to retain the **SA Objective No 8 To protect and enhance landscape, local countryside, open spaces and the historic environment.**

⁶⁶ https://www.coventry.gov.uk/downloads/download/904/conservation_area_maps

⁶⁷ <https://www.coventry.gov.uk/heritage-ecology-trees/coventry-historic-environment-record>

⁶⁸ <https://www.coventry.gov.uk/downloads/file/11670/coventry-historic-landscape-characterisation-report>

9 LANDSCAPE & TOWNSCAPE

Policy Context

National

- 9.1 The **National Planning Policy Framework** requires that valued landscapes should be protected and enhanced, recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services.
- 9.2 **A Green Future: Our 25 Year Plan to Improve the Environment (2018)**: Sets out goals for improving the environment within the next 25 years, including recovering nature and enhancing the beauty of landscapes.

Local

- 9.3 The **Coventry Local Plan** includes policies that seek to protect and enhance the local landscape/townscape, as follows:

Policy GB1 Green Belt and Local Green Space – the importance of green belt is its openness and its purpose to restrict urban sprawl. The policies map identifies the green belt and local green space boundaries and Policy GB1 sets out the requirements for development.

Policy GE1 Green Infrastructure requires new development to make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access.

Policy GE3 Biodiversity, Geological, Landscape and Archaeological Conservation protects against loss or damage of important landscape features.

GE4 Tree Protection

DE1 Ensuring High Quality Design includes the requirement to “*preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment.*”

- 9.4 The Coventry City Centre AAP sets out policies that further guide development, as follows:

Policy CC3 Building Design sets out criteria to be integrated into the design process.

Policy CC6 Public Realm requires integration of high quality soft and hard landscaping where relevant and advises on the palette of materials and street furniture.

Policy CC7 Tall Buildings requires that proposed tall buildings should be considered in relation to the views of the three spires.

- 9.5 The **Coventry City Council Open Space Supplementary Planning Document (SPD)** (March 2022)⁶⁹ supplements the CLP Policy GE1 Green Infrastructure, providing further information and guidance including the general presumption in favour of on-site provision of public open space. The council accepts that a financial contribution towards off-site provision or enhancement of existing open space may be more appropriate on smaller schemes.

Baseline Conditions

- 9.6 Coventry is located within the Arden National Character Area (NCA) as profiled by Natural England⁷⁰. The NCA comprises farmland and former wood-pasture lying to the south and east of Birmingham; the eastern part abuts and surrounds Coventry. The Coventry Historic Landscape study⁷¹ (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council.

Key Sustainability Issues & Objectives

- 9.7 The issues and opportunities for protecting and enhancing the local landscape remain. Whilst key CLP Policies DE1 and GE1-4 and CCAAP Policy CC3 provide strong guidance for development, there may still be localised issues/opportunities relating to HMOs and therefore, it is proposed to retain the **SA Objective No 8 To protect and enhance landscape, local countryside, open spaces and the historic environment.**

⁶⁹ <https://www.coventry.gov.uk/downloads/file/37974/open-space-spd>

⁷⁰ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands>

⁷¹ <https://www.coventry.gov.uk/downloads/file/11670/coventry-historic-landscape-characterisation-report>

10 SA FRAMEWORK & PROPOSED APPROACH

SA Framework

- 10.1 The use of an SA Framework of objectives is an established method through which the sustainability and environmental effects of a plan can be described and assessed. The SA Framework was originally developed by Coventry City Council from the analysis of policy objectives, baseline information, and key sustainability issues and opportunities identified in the Local Plan area. Each SA objective was further clarified through a number of sub-objectives to aid the appraisal process and aligned with indicators for monitoring purposes. The draft SA Scoping report was formally consulted upon in compliance with the SEA Regulations and the final SA Scoping Report published in 2015. The SA framework was used to assess the emerging Local Plan and City Centre Area Action Plan.
- 10.2 The SA scoping for the Homes in Multiple Occupation DPD has taken a proportionate approach as the DPD is somewhat limited in its scale and sphere of influence. The DPD relates to one CLP Policy H11 and aims to expand upon this by developing further, more detailed policy that seeks to address specific issues. The previous SA framework remains valid and robust, and it is proposed to retain it for the SA of the HMO DPD for consistency with the assessments of the other plans in the Coventry planning framework. A number of SA Objectives were found to be not relevant and/or not likely to have any significant effects through the updated scoping process, and as such, have been scoped out of the process.
- 10.3 The SA framework of sustainability objectives and decision-aiding sub-objectives/questions to assist the appraisal is, as follows:

Table 10.1 SA Framework

SA Objective	Sub-objective (will it...)
SA No 1: Improve accessibility to and use of basic services and amenities to all residents.	Make access more affordable? Improve accessibility to local services? Ease access for those without car?
SA No 2: Enable vibrant and inclusive communities that participate in decision-making	Encourage community participation in activities and/or in the democratic process? Devolve decision-making to communities (where appropriate)? Improve and increase community facilities? Reduce the potential for social isolation with particular regard to potentially disadvantaged groups?
SA No 3: Reduce social exclusion and poverty	Reduce poverty and social exclusion in those areas most affected? Lower dependence on welfare benefits? Increase wage levels for both man and woman

SA No 4: Improve health, reduce health inequalities and promote active living	Improve equitable access to high quality health services? Promote positive health and prevent ill health? Address health inequalities? Encourage healthy and active lifestyles? Create a smoke free Coventry
SA No 5: Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs	Make housing available to people in need? Improve the quality of housing stock? Reduce the number of vacant properties? Increase the use of sustainable building practices? Reduce homelessness? Meet the housing needs of the travellers and gypsy communities?
SA No 6: To reduce crime, disorder and fear of crime	Reduce actual levels of crime? Promote design that discourages crime? Address the cause of disorder and crime and/or reduce crime through intervention? Reduce fear of crime?
SA No 7: To encourage increased cultural and recreational activities across all sectors of the community	Increase availability and accessibility of culture, leisure and recreation (CLR) activities/venues? Provide support for CLR providers and/or creative industries? Preserve, promote and enhance culture and heritage in the City?
SA No 8: To protect and enhance landscapes, local countryside, open spaces and the historic environment	Protect and enhance features, area and landscape of historical and cultural value? Promote sensitive re-use of historic or culturally important buildings where appropriate (listed and non listed)? Provide for increased access to, and understanding of the historic environment? Conserve the character of historic settlements and conservation areas? Preserve and where appropriate enhance features of archaeological importance? Promote heritage-led regeneration?
SA No 9: To protect and enhance biodiversity	Scoped out
SA No 10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments	Promote the design of buildings on a human scale, encouraging walking and cycling? Promote the development of communities with accessible services, employment, shops and leisure facilities? Ensure high design quality, which supports local distinctiveness? Encourage re-use of existing buildings?
SA No 11: Enhance quality and minimise air, soil, water, light and noise pollution levels	Clean up contaminated land? Maintain and/or improve air quality? Maintain and/or improve surface water and groundwater quality? Maintain and where possible improve soil quality and minimise the loss of soils to development?

	Raise awareness about pollution and its effects? Reduce pollution from Air travel?
SA No 12: Minimise and manage the risk of flooding and the impacts of climate change	Scoped out
SA No 13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources	Increase the amount of energy from renewable sources that is generated and consumed in the region? Reduce the energy consumption? Reduce greenhouse gas emissions, particularly CO2 and methane? Increase energy efficiency in all sectors?
SA No 14: To minimise use of water, minerals and other natural resources	Increase efficiency in water, energy and raw material use? Make efficient use of land (appropriate density, protect good agricultural land, use brownfield land in preference to Greenfield sites)? Increase awareness and provide information on resource efficiency and waste? Reduce use of non-renewable resources?
SA No 15: To reduce travel by car and air	Improve access to opportunities and key resources and services for all groups by means other than the car (e.g. health, education, work and food shopping)? Ensure new developments provide essential services accessible without use of a car and are accessible by public transport? Ease congestion on the road/rail network? Make the transport/environment attractive to non-car users (e.g. pedestrians and cyclists)? Encourage freight transfer from road to rail? Provide integrated transport services? Increase provision of public transport where needed? Improve rail services and facilities? Reduce environmental impacts of traffic
SA No 16: To reduce pollution and waste generation and increase levels of reuse and recycling	Lead to reduce consumption of materials and resources? Minimise waste production? Increase waste reuse or recycling?
SA No 17: To meet local needs locally	Ensure that everyone has access to essential services (e.g. employment, education, health services and shops) and resources to serve communities are within reasonable non-car based travelling distance? Provide appropriate housing for local needs? Support the vibrancy of town and village centres? Investigate information/communication technology (ICT) links to connect geographically remote and disadvantaged groups to services and resources?

SA No 18: To improve Coventry's economy through developing a successful and diverse modern economy	Scoped out
SA No 19: To ensure access to good quality employment opportunities for all	Scoped out
SA No 20: Good education and training opportunities for all	Scoped out

Table 10.2: Significance Key

	Description & Significance of Effect
++	Major Positive
+	Minor Positive
0	Neutral/no impact
-	Minor Negative
--	Major Negative
?	Uncertain ⁷²

Proposed Approach

- 10.4 The SEA Regulations require that the SEA should consider the effects of “reasonable alternatives”. Planning Policy Guidance⁷³ advises that the SA “needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.” “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”
- 10.4 The Council does have the option of not preparing an HMO DPD and continuing with reliance on the existing CLP Policy H11 and this do-nothing option will be tested through SA. The purpose of preparing an HMO DPD is to address issues that have arisen (associated with waste, noise, anti-social behaviour, and weakening of community ties) and that are likely to exacerbate if some action is not taken. At this stage, it is not known if there will be any further meaningful (realistic and deliverable) options to the likely

⁷² There can be uncertainties during appraisal, especially when considering topics such as climate change and cumulative effects; this category of effect has been included for this SA we've added as it is acceptable in SEA Regs & practice – and can be useful to report

⁷³ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

preferred approach for the HMO DPD and the Regulation 18 consultation will seek to gauge whether there are further reasonable alternatives that should be considered. If any such reasonable alternatives are identified, they will be subject to SA in a comparable and consistent manner using the SA framework and same method of approach.

- 10.5 It is anticipated that the HMO DPD will comprise a number of specific Policies and these will be tested through SA using the SA framework. The nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary⁷⁴, cumulative⁷⁵ and synergistic⁷⁶) will be described where possible and reported in the appraisal commentary, together with any assumptions or uncertainties, such as information gaps. Where necessary, the SA will make suggestions and recommendations to mitigate any potential negative effects or promote opportunities for enhancement. The appraisal will be undertaken using professional judgment, supported by the baseline information and the wider Local Plan evidence base. The SA is also required to consider the likely significant effects of the implementation of a plan as a whole.

⁷⁴ Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

⁷⁵ Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

⁷⁶ These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

11 HABITATS REGULATIONS ASSESSMENT (HRA) SCREENING

HRA Screening (2016)

- 11.1 The HRA screening (2016)⁷⁷ undertaken of the Coventry Local Plan (CLP) and the City Centre Area Action Plan (CCCAAP) investigated one Special Area of Conservation (SAC) – Ensor’s Pool – the only designated site located within the 20km buffer zone identified from the centre of the Coventry plan area. There are no European Special Protection Areas (SPAs) or Ramsar sites within 20 km or nearby.
- 11.2 The HRA concluded that there would be no likely significant effects (LSEs) associated with changes in air quality, water quality and levels, recreational disturbance, or habitat loss/fragmentation on Ensor’s Pool SAC. The SAC is somewhat isolated as an abandoned claypit and designated for the presence of the white-clawed crayfish such that it was unlikely that the new development proposed in the Local Plan would have any impacts. The pool is clay-lined and not connected to other waterbodies/watercourses; it is replenished through rainfall.
- 11.3 The previous HRA studies also considered four other Special Areas of Conservation (SACs) that are beyond the 20km potential zone of influence – Bredon Hill, Worcestershire; Cannock Extension Canal, Staffordshire; Lyppard Grange Ponds, Worcestershire; and the River Mease in Derbyshire, Leicestershire, and Staffordshire. The potential for negative impacts on hydrologically sensitive Welsh SACs through possible future use of water sources in Wales to supply new development in Coventry was also investigated.
- 11.4 The HRA found that there were no likely environmental pathways associated with the four SACs located beyond the 20 km zone. Severn Trent Water confirmed that future water supplies for Coventry will come from local sources not Wales for the lifetime of the plan. Therefore, the HRA concluded that there would be no likely significant effects (LSEs) from the CLP and CCCAAP on these other SACs beyond the 20km buffer zone.

Updated HRA Screening (2022)

- 11.5 The HRA screening (2016) for the Coventry Local Plan was prepared before certain recent case law CJEU⁷⁸ were issued with significant implications for the HRA methods used in the UK. The Sweetman judgment found that competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the HRA screening stage whether a plan is likely to have an adverse effect on a European Site. However, the HRA screening for the Coventry Local Plan and City Centre AAP reached its conclusions without taking into account any embedded policy

⁷⁷ <https://www.coventry.gov.uk/heritage-ecology-trees/habitat-regulations-assessment>

⁷⁸ Please see People over Wind & Sweetman v Coillte Teoranta Case C-323/17 (April 2018) and Holohan v An Bord Pleanála (November 2018)

mitigation such as environmental criteria in policies that have to be met. No environmental pathways were identified and therefore, there were no likely significant effects (LSEs). The HRA screening stage did not rely upon avoidance or mitigation measures to draw conclusions as to whether the plans could result in LSEs.

- 11.6 The Holohan judgment found that the HRA process should consider the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites. It should also consider the potential for impacts offsite, such as through impacts to functionally linked land, and/or species or habitats that may be important in supporting the ecological processes of the site but are located beyond the boundaries of the European site.
- 11.7 This judgment has highlighted the importance for HRAs to consider functionally linked watercourses and land, with the potential for impacts on mobile species. Coventry lies within the catchment of the Severn River Basin⁷⁹. The Severn Estuary SAC/Ramsar site is hydrologically linked to the designated site through the River Avon in Warwickshire. The source of the River Avon is over 15km to the east of Coventry and the river runs to the south-west passing within about 5 km of the administrative boundary for Coventry. It is considered that there are no likely environmental pathways or LSEs due to the limited scale and scope of the HMO DPD and the distance (over 80 km measured directly through Magic map) from the Severn Estuary SAC/Ramsar.
- 11.8 The updated HRA screening for a plan in the Coventry City Council area has found that the findings from the previous HRA screenings of the Coventry Local Plan and City Centre AAP remain valid and relevant in the light of recent case law and changes to HRA practice. The HMO DPD is limited in its scale and scope. Overall, this HRA screening concluded that there would be no likely significant effects (LSEs) on the integrity of identified nearby designated sites, alone or in-combination.
- 11.9 Recently there has been concern for some internationally important water bodies protected under the HRA Regulations. Natural England had advised 32 local planning authorities that where protected sites are in unfavourable condition due to excess nutrients, projects and plans should only go ahead if they will not cause additional pollution to sites. This can be demonstrated through nutrient neutrality. This means that new residential development can only happen if the nutrient loading created through additional wastewater from the development is mitigated – typically through creating new wetlands to strip nutrients or creating buffer zones to revert to nature. In March 2022, Government advised⁸⁰ that a further 42 local planning authorities are affected by a further 20 protected sites that are adversely impacted by nutrient pollution. Coventry City Council is not affected, and this is not an issue that needs to be addressed through HRA for the HMO DPD.

⁷⁹ <https://www.gov.uk/government/publications/severn-draft-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales>

⁸⁰ <https://www.gov.uk/government/publications/nutrient-pollution-reducing-the-impact-on-protected-sites/nutrient-pollution-reducing-the-impact-on-protected-sites>

11 CONSULTATION & NEXT STEPS

- 11.1 Planning Policy Guidance⁸¹ advises that although the scoping stage is a key stage in the process, a formal scoping report is not required by law but is a useful way of presenting information at the scoping stage. A key aim of the scoping procedure is to help ensure the SA process is proportionate and relevant to the plan being assessed. However, in accordance with good practice and to demonstrate meeting the requirements of the SEA Regulations, the views of the three statutory bodies (Environment Agency, Historic England, and Natural England) are being sought in relation to the scope and level of detail to be included in the SA Report. The SA Scoping Report will be placed on the Council's website and comments from other stakeholders and the public are also invited.
- 11.2 Responses from consultees will be reviewed and appropriate amendments made to the detail contained in the Scoping Report, including the policy context, baseline, policy context, and SA Framework where necessary. Any updates to this detail will be presented in the final SA Scoping Report.
- 11.3 The findings of the SA will be reported at the next stage of the HMO DPD preparation process. The SA/SEA Report will accompany the draft HMO DPD on formal and public Regulation 19 consultation through the Council's website later in 2022. Any comments on the SA will be taken into consideration when the draft plan is subject to independent examination.

⁸¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>