



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

**Sustainability Appraisal (SA)  
Report**

**December 2022**

# Coventry Local Plan 2011-2031 Homes in Multiple Occupation (HMO) Development Plan Document (DPD) Regulation 19 Consultation Draft

## SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment)

### SA Report

date:	December 2022 v1 Draft December 2022 v2 Final	
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**Non Technical Summary (NTS)** available separately

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## **Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment): NON-TECHNICAL SUMMARY (NTS)**

### **This is the NTS of the Sustainability Appraisal (SA) Report**

1. This is the NTS of the SA Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Coventry Homes in Multiple Occupation (HMO) Development Plan Document (DPD). This summary is an integral part of the SA Report that accompanies the draft DPD for public consultation in early 2023. It provides an outline of the SA process and findings, including how the SA has influenced the development of the draft Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

### **The Coventry Local Plan 2031 & Homes in Multiple Occupation (HMO) Development Planning Document (DPD)**

2. 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 (SPDs), and Neighbourhood Plans, comprise the planning framework through which decisions are made on planning applications. The 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 and this extends beyond the city centre boundary.
3. A Home in Multiple Occupation is defined as a property rented to at least 3 people who are not from one household (such as a family) but share facilities such as a bathroom and a kitchen. With the city's growing population, there has been a growth in the rented sectors, and thus there is a need to ensure that new development supports communities by ensuring a balanced mix of housing types. The increasing concentration of HMOs have resulted in negative impacts for amenity and character of areas, reduced social cohesion, noise and nuisance disturbance, and highway safety concerns with poor parking and waste management. Therefore, the Council considers that there needs to be such further planning guidance to support the CLP Policy H11 now and ahead of the CLP Review that is ongoing now.
4. The Coventry HMO DPD is comprised, as follows:
  - Summary
  - Introduction

- Policy Context
  - HMOs in Coventry – Issues
  - Policies –
    - HMO1 Homes in Multiple Occupation
    - HMO2 Concentrations & Thresholds
    - HMO3 Sandwiching
    - HMO4 Amenity & Design
  - Assessment Process
- Appendix I Concentration of Existing HMOs, 2022

### **Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)**

5. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social, and economic considerations in the preparation of Local Plan Documents (DPDs). This requirement for SA is in accordance with planning legislation and paragraph 32 of the National Planning Policy Framework. DPDs must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
6. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK planning guidance suggests a staged approach to SA/SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope of the SA is prepared and includes a SA Framework of objectives for sustainable development relevant to the Coventry local authority area and the issues for HMOs, and which forms the basis against which the draft DPD is assessed.
7. Local Plan Documents must also be subject to Habitats Regulations Assessment (HRA). The Habitats Regulations (amended 2018) 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 Ramsar sites. It is a requirement to consider if the plan is likely to have significant effects on any relevant designated site. HRA is a two staged process – screening, and then appropriate assessment (if significant adverse effects are screened as likely).
8. An updated HRA screening (April 2022) was undertaken in respect of the emerging HMO DPD. This concluded that there would be no likely significant effects (LSEs) on the integrity of identified nearby designated sites, alone or in combination. During the consultation of the SA scoping and HRA screening, Natural England advised that they agreed with the conclusions reached.

### **Sustainability Characteristics of the Coventry City Area & Likely Evolution without the DPD**

9. There are no internationally designated sites (SPAs or Ramsar) within a 20 km radius of the Coventry DPD area. There is one isolated Special Area of Conservation (SAC) – Ensor's Pool – and the HRA concluded that there would be no likely significant effects from the DPD. The area contains two Sites of Special Scientific Interest (SSSIs), 16 Local Nature Reserves (LNRs), and 21 designated areas of ancient woodland.
10. There is no nationally designated landscape (AONB) but the landscapes in the area are valued for their scenic qualities, rich wildlife, cultural associations and historic values. The area has a rich historic and cultural heritage. 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, 16 Conservation Areas, 20 Scheduled Monuments, 4 Registered Parks and Gardens, and many other sites and features of historic interest. Coventry has a lot of older housing stock, some of which may become HMOs and the need to consider the historic assets and their settings is important, including resilience to climate change.
11. Air quality and traffic congestion remain issues, especially associated with the main transport corridors to the north and north-east (linked to M6). 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. Overcrowding from intensification of HMOs with on-site/off-site increased parking can lead to concerns about highway safety, noise, disturbance and air quality.
12. The total population of Coventry City Council (2020) 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. The Index Of Multiple Deprivation data (2019) 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.
13. Whilst the city's stock of HMOs is contributing to meeting local housing needs, increased numbers of multiple occupancy properties have the potential to create negative impacts. Over years across the Coventry area, many issues have been reported to the Council, including concern about the increasing numbers and concentrations of HMOs and their effects on reduced social cohesion, reduced housing choice, reduced community engagement with a more transient population, and overlooking with loss of privacy – all of which can affect health and wellbeing of residents.
14. Concerns have been raised about intensification of HMOs and detriment to visual amenity resulting from poor waste management, poor property

maintenance, accumulative external alterations to properties, and use of frontage areas for off-street parking. Noise and disturbance resulting from intensification of residential use and/or constantly changing nature of households is an issue. There are concerns about detriment to visual amenity and potentially health/wellbeing resulting from poor waste management. Also, risks to highway safety through accumulation of poorly stored waste on the pavement or roadside.

15. The HMO DPD is focused on a specific topic – HMOs - and, therefore, it is somewhat limited in its scale and sphere of influence with regard to likely significant effects. Many sustainability factors are not relevant and the SA focused on the baseline characterisation, key issues and opportunities that were directly relevant to the HMO DPD.
16. Without the Coventry HMO DPD to guide and manage such development proposals in an integrated and holistic way, the current problems and issues associated with HMOs that have been reported to the Council are likely to get exacerbated. This particularly relates to the intensification of HMOs in certain areas and the cumulative negative effects that are likely to increase – noise and disturbance, loss of amenity, anti-social behaviour and social isolation, highway safety, and poor waste management – and all these factors can have adverse effects on communities and residents' wellbeing.

### Key Sustainability Issues and Opportunities

17. The Council remains committed to meeting the local identified need for housing with a mix of tenures, appropriate distribution of affordable housing, and appropriate densities for local character, student accommodation, and houses in multiple occupation. Other key relevant sustainability issues may be summarised, as follows:
  - Enabling vibrant and inclusive communities
  - Improving health and reducing health inequalities
  - Enable good quality HMOs that provide satisfactory housing for local needs & that do not intensify nor cause adverse impacts on local residents & their environment
  - Protect and enhance the local townscape characters & amenity/visual values
  - Protect and enhance the historic environment and its setting
  - Promote and support more sustainable transport
  - Promote safe sustainable waste management

### How has the Coventry HMO DPD been assessed?

18. The SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

SA Objective
No 1: Improve accessibility to and use of basic services and amenities to all residents
No 2: Enable vibrant and inclusive communities that participate in decision-making
No 3: Reduce social exclusion and poverty
No 4: Improve health, reduce health inequalities and promote active living
No 5: Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs
No 6: To reduce crime, disorder and fear of crime
No 7: To encourage increased cultural and recreational activities across all sectors of the community
No 8: To protect and enhance landscapes, local countryside, open spaces and the historic environment, and the setting of heritage assets
No 9: To protect and enhance biodiversity <i>Scoped out</i>
No 10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments
No 11: Enhance quality and minimise air, soil, water, light and noise pollution levels
No 12: Minimise and manage the risk of flooding and the impacts of climate change <i>Scoped out</i>
No 13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources
No 14: To minimise use of water, minerals and other natural resources
No 15: To reduce travel by car and air
No 16: To reduce pollution and waste generation and increase levels of reuse and recycling
No 17: To meet local needs locally
No 18: To improve Coventry's economy through developing a successful and diverse modern economy <i>Scoped out</i>
No 19: To ensure access to good quality employment opportunities for all <i>Scoped out</i>
No 20: Good education and training opportunities for all <i>Scoped out</i>

19. The SA Framework was originally developed as part of the SA process that investigated the emerging Coventry Local Plan during 2015-2017. The basis for the assessment of the HMO DPD was the same framework of objectives to ensure consistency and continuity. 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. SA No 8 was strengthened for consideration of the historic environment and its setting. The categories of significance used with SA Framework are as set out in the key below:

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

?	Uncertain
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20. Each of the four draft HMO Policies was assessed using the SA objectives with professional judgment and the baseline information. Then the DPD as a whole was considered and including cumulative effects, where possible, and noting interrelationships.

### **What reasonable alternatives have been considered & addressed?**

21. 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 was tested through SA. The purpose of preparing an HMO DPD is to address 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) and that are likely to exacerbate if some action is not taken.
22. During the Regulation 18 consultation on the Issues & Preferred Option draft of the HMO DPD, several residents expressed concern about the proposed concentration of 10% or more of all dwellings and within 100m radius of the centre point of the application property – where there is an existing HMO concentration, applications will not be supported. Residents were concerned that this may not reflect the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing. Some residents suggested that the Council should consider different concentrations and different thresholds, and for example, suggested 5% and 750m radius.
23. The Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. However, as some residents have raised their concern, the Council agreed to test the options of a 5% concentration and a 750 radius from the mid-point of any existing HMO through SA. The SA found that 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.
24. Research based on similar sized cities already implementing an HMO policy indicates that this threshold is appropriate and reasonable. High concentrations of HMOs are already having an adverse impact on character and amenity in Coventry, and the Council aims to help maintain mixed and balanced communities. 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.

### **What are the likely significant effects of the draft DPD? How has the SA influenced the draft DPD?**

25. Overall, the implementation of the Homes in Multiple Occupation DPD is likely to have positive effects for housing, balanced communities, and health and wellbeing. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character. The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented. This will resolve existing sustainability problems, and avoid exacerbation of further cumulative negative effects such that overall positive effects are indicated. There were no significant negative effects identified.
26. The DPD has recognised where there could be certain negative effects arising, particularly from the intensification of HMOs. The Council has ensured that there are additional mitigation measures within the four HMO policies to support and/or strengthen the policies in the adopted Local Plan. The SA found that there was strong mitigation provided through HMO policy requirements to mitigate potential negative effects for amenity and character of Coventry areas. This included consideration of avoiding/reducing likely cumulative effects for social isolation, anti-social behaviour, amenity and visual impacts, poor air quality and traffic/parking, nuisance noise, and poor waste management.

### **How could negative effects be mitigated?**

27. The SA did not identify any significant negative effects from the implementation of the DPD and that would need mitigation.

### **Were there any difficulties encountered?**

28. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties, particularly with regard to climate change and longer-term effects, for example in predicting the likely future baseline, and assumptions were made using professional judgment.

### **Consultation**

29. The proposed scope of the SA was consulted on in September-November 2022 with the statutory bodies (Historic England, Environment Agency, and Natural England) and comments received by HE and NE have been taken into account in developing the DPD and the SA. This SA Report accompanies the draft Coventry HMO DPD for wider consultation with stakeholders and the public in early 2023. The draft DPD and supporting evidence, including the SA

Report and any comments on it, will be sent to the Secretary of State for independent examination by a Planning Inspector.

### Monitoring Proposals

30. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. The Coventry monitoring strategy for the Local Plan is considered satisfactory for the requirements from the SA process.

## 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 objectives<sup>1</sup>.
- 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)<sup>2</sup>. SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup>. Coventry City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Coventry Homes in Multiple Occupation (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 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. 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. The role of the SA is to inform the plan-making process.
- 1.5 This SA Report explains the Stage A Scoping that was completed earlier and sent to the statutory consultation bodies in accordance with good practice. It reports the findings of Stage B Alternatives & Assessment and comprises Stage C Preparation of the SA Report. This SA Report accompanies the Coventry Homes in Multiple Occupation DPD on public consultation for Stage D and seeks comments from the public and the statutory consultees.

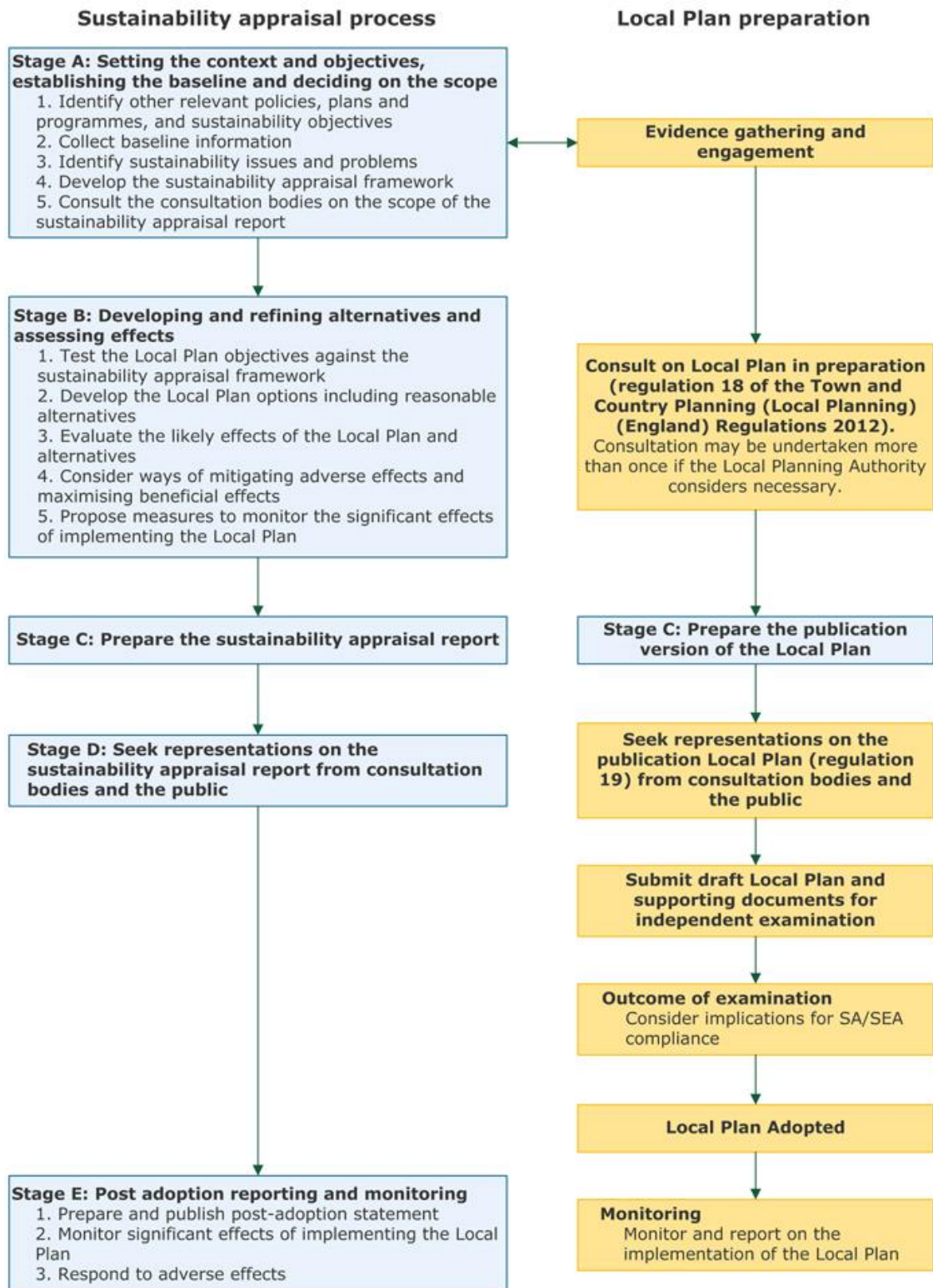
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<sup>1</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

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

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

**Figure 1.1: SA and Plan-making Stages and Tasks**



## Habitats Regulations Assessment (HRA)

- 1.6 Local Plan Documents must also be subject to Habitats Regulations Assessment (HRA)<sup>4</sup>. The Conservation of Habitats & Species Regulations (2017, amended 2018)<sup>5</sup> 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 Ramsar<sup>6</sup> 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.
- 1.7 The updated HRA screening (April 2022) for a plan in the Coventry City Council area 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. During the consultation of the SA scoping and HRA screening, Natural England advised that they agreed with the conclusions reached.

## The Coventry Local Plan (CLP) and the Homes in Multiple Occupation (HMO) Development Plan Document (DPD)

- 1.8 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, comprise the planning framework through which decisions are made on planning applications. The 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 99km<sup>2</sup> located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa.
- 1.9 The focus for the DPD is on homes in multiple occupation and is being produced in tandem with an Article 4 Direction that will remove Permitted Development Rights in relation to HMOs. HMOs are properties rented to at least 3 people who are not from one household, such as a family, but share facilities like a bathroom or kitchen. Currently, planning permission is not needed to change the use of a house to an HMO with 3-5 residents. Although the Council has now commenced the review of its Local Plan, it wishes to produce a stand-alone HMO DPD as it is facing particular issues with HMOs

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

<sup>5</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

<sup>6</sup> Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance

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.

- 1.10 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 and a first foot on the housing ladder for many of the city's young people in general.
- 1.11 During their preparation, the emerging Coventry Local Plan and the City Centre Area Action Plan were subject to SA<sup>7</sup> and HRA.
- 1.12 The Coventry HMO DPF comprises an introduction that explains the context for the plan and how it aims to provide a policy approach to HMOs, housing diversity, residential amenity and parking standards in order to ensure that the new HMO developments meet other policy requirements to mitigate any adverse impacts on the surrounding areas. It also explains the role of the HMO licensing regime which is a separate process that can relate to both HMOs which do, and do not, require planning permission. The Article 4 Direction is subject to a separate consultation process.
- 1.13 The DPD sets out the planning policy context, including CLP Policy H11, and the Planning Use Classes Order. Chapter 4 explains the issues for Coventry and HMOs. Chapter 5 presents the 4 Policies, as follows:

**Policy HMO1 Homes in Multiple Occupation (HMOs):** Proposals are required to demonstrate good accessibility, accord with the emerging Accessible Homes standard, and will not have adverse impacts on amenity or character

**Policy HMO2 Concentrations & Thresholds:** Where there is an existing HMO concentration of 10% or more dwellings within 100m radius of the centre point of the application property, HMO applications will not be supported.

**Policy HMO3 Sandwiching:** Requires that provision of HMOs must not result in a non-HMO dwelling being sandwiched between two HMOs.

**Policy HMO4 Amenity & Design:** Provides six criteria (a) – (f) against which proposals will be assessed.

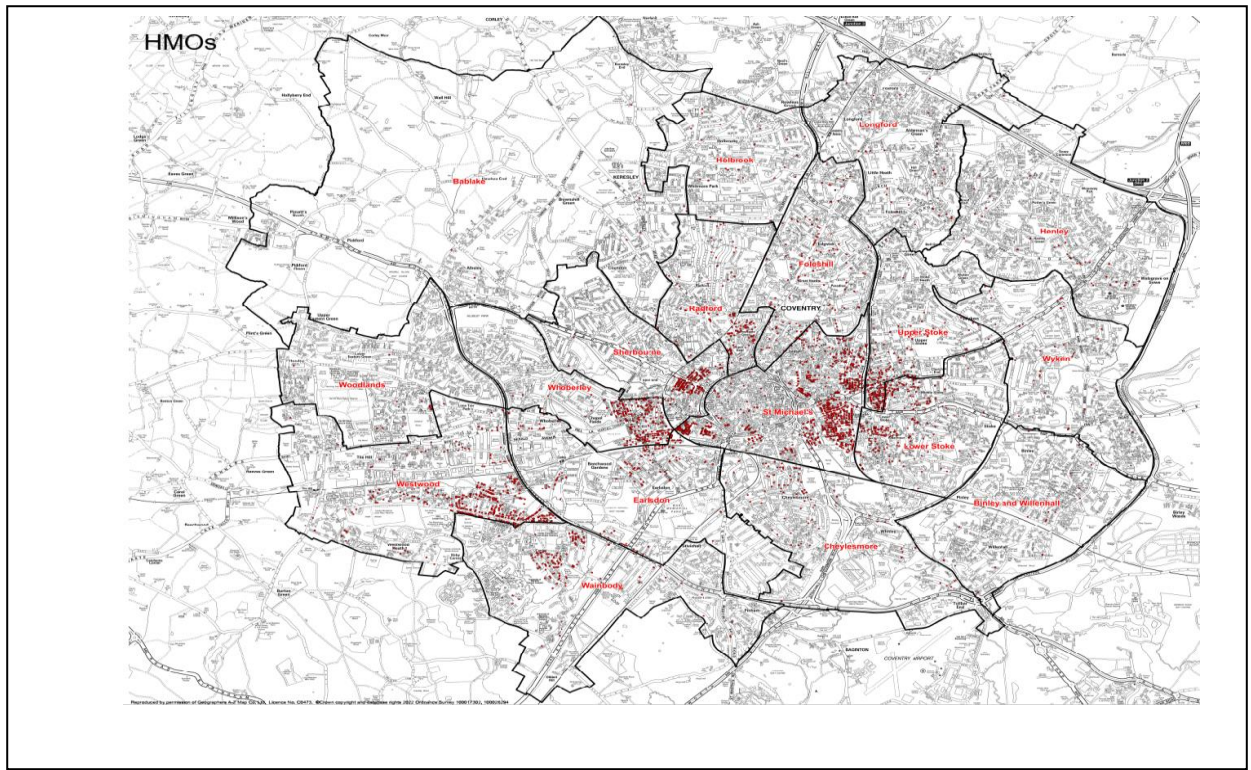
- 1.14 Chapter 6 explains the proposed assessment process for determining planning applications for new HMOs or additional bed spaces within existing HMOs. It sets out a 3-staged process for calculating the percentage concentration of HMOs. Exceptional circumstances are acknowledged and this is explained at the end of the chapter. The boundary of the HMO DPD

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<sup>7</sup> <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/3>

and the locations of HMOs in the Coventry area are shown in Figure 1.2, as follows:

**Figure 1.2:** Locations of HMOs in Coventry & DPD boundary



## Consultation

- 1.15 The statutory environmental consultation bodies – Environment Agency, Historic England, Natural England - were consulted upon the SA/SEA & HRA scoping and screening report (April 2022). The Regulation 18 Issues & Preferred Option draft HMO DPD was subject to public consultation from 20 September 2022 to 15 November 2022. The SA scoping & HRA screening report was also available for comment; all documents were placed on the Council's website<sup>8</sup> for comment. Comments received from the environmental bodies were taken into account to finalise the SA Scoping Report (December 2022).
- 1.16 Comments received on the HMO Issues & Preferred Option draft DPD (July 2022) were taken into account to prepare the next draft of the DPD for Regulation 19 consultation. The SA of the emerging draft DPD has informed the ongoing development of the plan in an iterative manner and the SA findings are presented in this SA Report (December 2022). SA Reports accompany the stages of the plan as set out in the following Table 1.1 with the chronology of the plan preparation, consultation and the accompanying SA/SEA stages:

<sup>8</sup> <https://coventrycitycouncil.inconsult.uk/HMO/consultationHome>

**Table 1.1: Coventry HMO DPD with SA/SEA Stages and Documents**

<b>Coventry HMO DPD Stage and Documents Consultation</b>	<b>SA/SEA Stage and Documents Consultation</b>
<b>Evidence Gathering &amp; Technical Studies</b> 2022	
<b>Issues &amp; Preferred Option</b> (July 2022) Regulation 18 Consultation: 20 September 2022 to 15 November 2022	<b>SA/SEA Scoping Report &amp; HRA Screening Report</b> (April 2022) Consultation: 20 September – 15 November 2022) Final SA/SEA Scoping Report (December 2022)
<b>Pre-Submission HMO Development Plan Document</b> Regulation 19 Consultation: Early 2023	<b>Pre-Submission SA Report</b> (December 2022) Consultation: Early 2023
<b>Submission &amp; Examination</b> To be confirmed later 2023	<b>Submission &amp; Examination</b> To be confirmed later 2023
<b>Local Plan Adoption</b>	<b>SA Adoption Statement</b>

- 1.17 Coventry City Council is publishing the draft Regulation 19 HMO DPD together with this SA Report for statutory and wider public consultation. Any comments on the draft DPD and SA will be taken into account at the next stages of plan-making – submission to the Secretary of State and independent examination. In 2022, independent specialist consultants at Enfusion Ltd were commissioned by Coventry Council to undertake the SA/SEA.

### Compliance with the Requirements of the EU SEA Directive

- 1.18 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. This SA Report presents the SA/SEA testing of the emerging new Local Plan and includes a Non-Technical Summary and an appendix that clearly signposts the requirements for reporting the SEA.

### Purpose and Structure of this SA Report

- 1.19 This document reports the SA/SEA process for the Coventry HMO DPD. This SA draws upon the earlier SA work, updating and building upon the previous SA/SEA/HRA of the adopted Local Plan for consistency and correlation, particularly with regard to the scoping stage. 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.

- 1.20 Following this introductory Section 1, this report is structured into further sections:
- Section 2 describes the approach and methods used to appraise the emerging elements of the Plan; explains how options in plan-making and alternatives in SA/SEA have been addressed and reported explicitly to demonstrate compliance with the requirements of the EU SEA Directive
  - Section 3 summarises the sustainability context and characteristics with details available in the Final SA Scoping Report (December 2022) available on the Council's website
  - Section 4 summaries the findings of the SA of the draft Policies HMO1-4 and the DPD as a whole
  - Section 5 introduces the approach to monitoring and the SA
  - Section 6 provides summary conclusions from the SA, sets out the requirements for consultation and commenting on the report, and explains the next steps
- 1.21 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA/SEA are located in the SA Report. Appendix II is the SA Scoping Report (available separately) and including the details of the baseline evidence and the development of the SA Frameworks for assessment. Representations to consultations and responses made are reported in Appendix III. Appendix IV details the appraisal of the options for thresholds and concentrations. Appendix V details the appraisal of the 4 HMO Policies, against the full SA framework of objectives for sustainable development.

## 2.0 APPROACH & METHOD

### The SA/SEA Process & Approach Taken

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Coventry Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned to the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of appraisal/assessment processes that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (2022) in paragraph 35b that states that evidence should be proportionate. Planning guidance advises<sup>9</sup> that the SA should focus on what it needed to assess the likely significant effects of the plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the plan .

### Scoping & the SA Framework

- 2.3 The SA scoping for the HMO DPD took a proportionate and pragmatic approach as the DPD is limited in its scale and sphere of influence, and in consideration of the position of the DPD in the planning policy hierarchy. The DPD relates to one CLP Policy H11 and aims to expand upon this by developing further, more detailed policies that seek to address specific issues. The previous SA framework remains valid and robust, and was 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.
- 2.4 Through the scoping process, the relevant policy context was reviewed, and baseline information was identified, collated and analysed to ensure that key issues and opportunities for the Coventry LP area and relevant for HMOs were identified. The details of this analysis are presented in final SA Scoping Report (December 2022) and a summary is provided in the following Section 3 of this SA Report.
- 2.5 The SA Framework provides the basis by which the sustainability effects of the HMO DPD are described, evaluated and any options compared. It includes a number of objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan and DPD, and sustainable

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<sup>9</sup> <https://www.gov.uk/guidance/environmental-impact-assessment>

development in the Coventry area. These objectives have been identified through the SA Scoping Stage from the information collated in the policy context, baseline analysis, and identification of sustainability issues. Thus, the SA draws upon the earlier SA work, updating and building upon the previous SA/SEA/HRA of the adopted Local Plan for consistency and correlation.

- 2.6 The proposed scope and method of assessment were consulted upon with the statutory environmental bodies. No comment was received at this stage from the Environment Agency. Natural England commented that they agreed with the conclusions reached. Historic England (HE) welcomed the retention of SA Objectives No 8 Landscape & Historic Environment, and suggested that “*and the setting of heritage assets*” should be included. HE also suggested inclusion of an additional sub-objective for SA No 13 Energy “*improve energy efficiency of historic buildings*” – both these suggestions have been included into the SA Framework. HE also explained the importance of understanding the effects of climate change on the historic environment and suggested certain recent documents from HE that would be helpful for the assessment. Overall, HE considered that the amendments to the scope of the SA for Coventry City Council's HMO DPD, as set out above, are necessary to ensure that it meets the requirements of the Directive and Legislation in relation to heritage.

## SA Framework

- 2.7 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.
- 2.8 For the SA of the HMO DPD, 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. The SA framework of sustainability objectives and decision-aiding sub-objectives/questions to assist the appraisal is, as follows:

**Table 2.1 SA Framework**

SA Objective	Sub-objective (will it...)
SA No 1: <b>Improve accessibility to and use of basic services and amenities to all residents.</b>	Make access more affordable? Improve accessibility to local services? Ease access for those without car?
SA No 2:	Encourage community participation in activities

<b>Enable vibrant and inclusive communities that participate in decision-making</b>	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: <b>Reduce social exclusion and poverty</b>	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: <b>Improve health, reduce health inequalities and promote active living</b>	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: <b>Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs</b>	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: <b>To reduce crime, disorder and fear of crime</b>	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: <b>To encourage increased cultural and recreational activities across all sectors of the community</b>	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: <b>To protect and enhance landscapes, local countryside, open spaces and the historic environment, and the setting of heritage assets</b>	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: <b>To protect and enhance biodiversity</b>	Scoped out
SA No 10: <b>Promote a high quality built environment by improving design and layout and</b>	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?

<b>encourage local distinctiveness and stewardship of local environments</b>	Ensure high design quality, which supports local distinctiveness? Encourage re-use of existing buildings?
SA No 11: <b>Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	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: <b>Minimise and manage the risk of flooding and the impacts of climate change</b>	Scoped out
SA No 13: <b>To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	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? Improve energy efficiency of historic buildings?
SA No 14: <b>To minimise use of water, minerals and other natural resources</b>	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: <b>To reduce travel by car and air</b>	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: <b>To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Lead to reduce consumption of materials and resources? Minimise waste production? Increase waste reuse or recycling?
SA No 17:	Ensure that everyone has access to essential

<b>To meet local needs locally</b>	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: <b>To improve Coventry's economy through developing a successful and diverse modern economy</b>	Scoped out
SA No 19: <b>To ensure access to good quality employment opportunities for all</b>	Scoped out
SA No 20: <b>Good education and training opportunities for all</b>	Scoped out

- 2.9 The categories of significance used with SA Framework are as set out in the key below:

**Table 2.2: Significance Key**

	<b>Description &amp; Significance of Effect</b>
<b>++</b>	Major Positive
<b>+</b>	Minor Positive
<b>0</b>	Neutral/no impact
<b>-</b>	Minor Negative
<b>--</b>	Major Negative
<b>?</b>	Uncertain <sup>10</sup>

### Assessing the draft DPD

- 2.10 Each emerging element of the DPD was appraised against the SA Framework of objectives using professional judgment and in consideration of the baseline conditions. The nature of the likely sustainability effects (including major/minor, positive/negative, duration (short, medium or long term),

<sup>10</sup> There can be uncertainties during appraisal, especially when considering topics such as climate change, and cumulative effects

permanent/ temporary, secondary<sup>11</sup>, cumulative<sup>12</sup> and synergistic<sup>13</sup>) were described in the appraisal commentary, together with any assumptions or uncertainties. Where necessary, the SA made suggestions to mitigate negative effects or promote opportunities for enhancement of positive or neutral effects. SA is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects, particularly at a strategic level of assessment.

- 2.11 The original SA numbering of objectives was retained to demonstrate consistency with the earlier SA of the CLP. During assessment, the findings for SA No 8 were divided into two topics – landscape/open spaces and the historic environment. Since the development of the original SA framework in 2015, the importance of these topics has been enhanced and requirements in the NPPF are more explicit such that it was considered that they need to be addressed separately.
- 2.12 Each draft HMO Policy was assessed using the SA objectives. Then the DPD as a whole was considered and including cumulative effects, where possible, and interrelationships.

### Consideration of Alternatives

- 2.13 The SEA Regulations require that the SEA should consider the effects of “reasonable alternatives”. Planning Policy Guidance<sup>14</sup> 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.”
- 2.14 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 was tested through SA. The purpose of preparing an HMO DPD is to address 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) and that are likely to exacerbate if some action is not taken.
- 2.15 During the Regulation 18 consultation on the Issues & Preferred Option draft of the HMO DPD, several residents expressed concern about the proposed concentration of 10% or more of all dwellings and within 100m radius of the

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<sup>11</sup> Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

<sup>12</sup> 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.

<sup>13</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

<sup>14</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

centre point of the application property – where there is an existing HMO concentration, applications will not be supported. Residents are concerned that this may not reflect the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing. Some residents suggested that the Council should consider different concentrations and different thresholds, and for example, suggested 5% and 750m radius.

- 2.16 The Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. Research based on similar sized cities already implementing an HMO policy indicates that this threshold is appropriate and reasonable. Therefore, the Council did not consider that there were any other realistic options that needed testing through SA. However, as some residents have raised their concern, the Council agreed to test the options of a 5% concentration and a 750 radius from the mid-point of any existing HMO through SA.

### 3.0 SUSTAINABILITY CONTEXT & SUMMARY BASELINE CHARACTERISATION

#### Policy Context

- 3.1 The HMO DPD, when adopted, will be part of the Coventry Local Plan 2031 (adopted 2017) and as such, proposals for HMOs will need to be compliance with other policies in the Local Plan, as well as national planning policies and guidance.

#### Communities, Housing, Services/Facilities, & Health

- 3.2 The total population of Coventry City Council (2020)<sup>15</sup> 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. Coventry City Council (2020)<sup>16</sup> 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.
- 3.3 The Index of Multiple Deprivation (IMD) data (2019)<sup>17</sup> 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.
- 3.4 Whilst the city's stock of HMOs is contributing to meeting local housing needs, increased numbers of multiple occupancy properties have the potential to create negative impacts. Over many years across the Coventry area, many issues have been reported to the Council<sup>18</sup>, including concern about the increasing numbers and concentrations of HMOs and their effects on reduced social cohesion, reduced housing choice, reduced community engagement with a more transient population, and overlooking with loss of privacy – all of which can affect health and wellbeing of residents.
- 3.5 It is understood that non-student HMOs are generally clustered across wards in Sherbourne, Whoberley, and Upper/Lower Stoke. The level of student population in the city is also a factor affecting the amount and distribution of HMOs. The residential areas that tend to have high concentrations of student populations are the areas that surround or are accessible easily to the city's two universities. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities.

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<sup>15</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>16</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>17</sup> <https://coventry-city-council.github.io/imd/2019/>

<sup>18</sup> Coventry City Council (2022) Supporting Case for Homes in Multiple Occupation (HMOs)

## Climate Change

- 3.6 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. 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. It is also important to understand the implications for climate change and the historic environment.

## Transport, Air Quality & Noise

- 3.7 A Coventry City-Wide AQMA was declared<sup>19</sup> for nitrogen dioxide in 2009 and emissions from road transport are the principal source of NO<sub>2</sub>. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO<sub>2</sub> standard. The LAQM annual status report<sup>20</sup> 2020 advises that there is a general decline in levels of nitrogen dioxide and that levels of particulates – PM<sub>10</sub> – do not exceed national standards. The main concern remains associated with the major arterial routes with high levels of queuing traffic contributing vehicle emissions.
- 3.8 Noise is a common 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. Noise and disturbance resulting from intensification of residential use and/or constantly changing nature of households is an issue of concern that has been reported to the Council.

## Natural Resources – Waste Management

- 3.9 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. There are concerns about detriment to visual amenity and potentially health/wellbeing resulting from poor waste management. Also, risks to highway safety through accumulation of poorly stored waste on the pavement or roadside.

## Historic Environment

- 3.10 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

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<sup>19</sup> [https://uk-air.defra.gov.uk/aqma/details?aqma\\_ref=625](https://uk-air.defra.gov.uk/aqma/details?aqma_ref=625)

<sup>20</sup> <https://www.coventry.gov.uk/downloads/file/36081/2020-air-quality-annual-status-report-asr->

for Local Listing. The city has 16 Conservation Areas<sup>21</sup>, 20 Scheduled Monuments 4 Registered Parks and Gardens, and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record<sup>22</sup>. Historic England advised that understanding the effects of climate change on the historic environment is important, particularly as Coventry has a lot of older housing stock, some of which will be, or may become, HMOs.

### Landscape & Visual Amenity

- 3.11 Coventry is located within the Arden National Character Area (NCA) as profiled by Natural England<sup>23</sup>. 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 study<sup>24</sup> (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council.
- 3.12 Concerns have been raised about intensification of HMOs and detriment to visual amenity resulting from poor waste management, poor property maintenance, accumulative external alterations to properties, and use of frontage areas for off-street parking.

### Do-Nothing Situation

- 3.13 If the Council continues to rely on CLP Policy H11 HMOs, the issues and concerns reported to the Council are likely to become exacerbated. The Council has identified three key strategic issues arising if nothing is done, as follows:
- Cumulative negative effects on the qualities and characteristics of a residential area
  - Negative effects at a local level when an existing dwelling is sandwiched between two HMOs
  - Negative effects at a ward level with an accumulation of HMOs resulting in an unbalanced community

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<sup>21</sup> [https://www.coventry.gov.uk/downloads/download/904/conservation\\_area\\_maps](https://www.coventry.gov.uk/downloads/download/904/conservation_area_maps)

<sup>22</sup> <https://www.coventry.gov.uk/heritage-ecology-trees/coventry-historic-environment-record>

<sup>23</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands>

<sup>24</sup> <https://www.coventry.gov.uk/downloads/file/11670/coventry-historic-landscape-characterisation-report>

## 4 SA of HOMES in MULTIPLE OCCUPATION (HMO) DEVELOPMENT PLAN DOCUMENT (DPD)

### SA of Options for Concentrations & Thresholds

- 4.1 Options for thresholds and concentrations of HMOs at 5% & 10% and 100m & 750m were investigated through SA using the SA framework of objectives and the findings are detailed in Appendix IV of this SA Report. The summary SA findings are shown in the table, as follows:

**Table 4.1: Summary SA of Options for Concentrations & Thresholds**

SA Objective	Threshold		Concentration	
	5%	10%	100m	750m
SA No 1: <b>Improve accessibility to and use of basic services and amenities to all residents.</b>	0	0	0	0
SA No 2: <b>Enable vibrant and inclusive communities that participate in decision-making</b>	++?	++?	++?	++?
SA No 3: <b>Reduce social exclusion and poverty</b>	0	0	0	0
SA No 4: <b>Improve health, reduce health inequalities and promote active living</b>	+	+	+	+
SA No 5: <b>Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs</b>	++?	++?	++?	++?
SA No 6: <b>To reduce crime, disorder and fear of crime</b>	++?	+	+	++?
SA No 7: <b>To encourage increased cultural and recreational activities across all sectors of the community</b>	0	0	0	0
SA No 8a: <b>To protect and enhance landscapes, local countryside, open spaces</b>	++?	+	+	-?
SA No 8b: <b>To protect and enhance the historic environment, and the setting of heritage assets</b>	++?	+	+	-?
SA No 9: <b>To protect and enhance biodiversity</b>	Scoped out			
SA No 10: <b>Promote a high quality built environment by improving design &amp; layout &amp; encourage local distinctiveness</b>	0	0	0	0
SA No 11: <b>Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	++?	+	+	-?
SA No 12: <b>Minimise and manage the risk of flooding &amp; the impacts of climate change</b>	Scoped out			

SA No 13: <b>To minimise greenhouse gas emissions and energy use, increase energy efficiency &amp; renewable energy</b>	0	0	0	0
SA No 14: <b>To minimise use of water, minerals and other natural resources</b>	0	0	0	0
SA No 15: <b>To reduce travel by car and air</b>	0	0	0	0
SA No 16: <b>To reduce pollution and waste generation and increase levels of reuse and recycling</b>	++?	+	+	-?
SA No 17: <b>To meet local needs locally</b>	+	+	+	++?
SA No 18: <b>To improve Coventry's economy</b>	Scoped out			
SA No 19: <b>To ensure access to good quality employment opportunities for all</b>	Scoped out			
SA No 20: <b>Good education and training opportunities for all</b>	Scoped out			

- 4.2 There were several SA objectives for which the HMO policies had only a negligible or neutral effect. SA No 3 focuses on reducing social exclusion and poverty; SA No 7 focuses on encouraging increased cultural and recreational activities; SA No 10 seeks to promote a high quality built environment by improving design and layout of new development; SA No 13 is focused on mechanisms to minimise greenhouse gas emissions; SA No 14 protects natural resources; and SA No 15 seeks to reduce travel by car. The HMO DPD in itself will not affect these sustainability factors significantly, and mitigation is provided by other CLP policies.
- 4.3 **Communities, Health & Housing:** Objective SA No 2 aims to enable vibrant and inclusive balanced communities. The Council recognises potential cumulative negative effects through incremental intensification of HMOs in an area. This is already experienced in some areas and resulting in unbalanced communities. The proactive planning for HMOs through the DPD is likely to have major positive effects by mitigating for such unbalance in communities.
- 4.4 This mitigation may be limited by reducing the concentration to 5% and by extending the distance to 750m - less likely to resolve existing problems of unbalanced communities. There may still be a focus of HMOs in certain areas such that the objectives for balanced communities and affordable housing for all are not so well progressed - therefore, only minor positive effects. There is some uncertainty of the precise level of significance and it is noted that the situation will change in time as more purpose built student accommodation (PBSA) becomes established. SA No 17 aims to meet local needs locally. Proactive planning through the DPD intentions will have likely positive effects but some uncertainty with extending the radius to 750m as may still result in an accumulation of HMOs in some areas. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character.

- 4.5 The proactive approach to managing housing is likely to have positive effects for all options, since provision and access to decent quality housing is known to have positive effects for health. The DPD is responding to an identified need in housing and thus, overall major positive effects through provision of a particular type of housing with identified need.
- 4.6 However, by reducing the concentration threshold to 5% existing HMOs, there may be less support for progressing HMOs (as the concentration might be considered to be too restrictive) - and this type of housing is an important identified need, so that the positive effects may be reduced to minor. Similarly, if the distance is extended to 750m, this would seem to extend the concentration of HMOs and limit the areas to which the DPD would apply – therefore, potential for not progressing the housing objectives and positive effects reduced to minor.
- 4.7 Minor positive effects are indicated for objectives to reduce crime, but these are less certain if the DPD only applies to where there is a concentration of 5% and/or a 750m radius – less likely to resolve an existing sustainability problem when applied across the city as whole.
- 4.8 **Townscape/Landscape & Historic Environment:** The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. 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. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out to 750m, the risk of adverse effects on townscape and the historic environment are increased, less mitigated – and there is some uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs and the potential for minor negative effects as accumulation continues. Retaining the distance to 100m, mitigation is more certain and with resolution of the existing sustainability problems.
- 4.9 **Air & Noise Pollution; Waste Management:** 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. This indicates further positive effects overall but uncertainty of precise significance. 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, particularly for those areas that already have an accumulation of HMOs and risk of negative effects. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems and confirming likely positive effects.

## Outline Reasons for Progressing the Preferred Option

- 4.10 The Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. Research based on similar sized cities, such as Warwick, Birmingham, and Liverpool, already implementing an HMO policy indicates that this threshold is appropriate and reasonable. High concentrations of HMOs are already having an adverse impact on character and amenity in Coventry, and the Council aims to help maintain mixed and balanced communities. 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.
- 4.11 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.

## SA of HMO DPD Policies

- 4.12 The proposed four policies for the HMO DPD was tested through SA using the SA Framework and professional judgment with the evidence base. Details of the SA findings are presented in Appendix IV of this report and summary findings are shown in Table 4.1, as follows:

**Table 4.2: Summary SA of Policies**

SA Objective	Policy HMO1	Policy HMO2	Policy HMO3	Policy HMO4
SA No 1: <b>Improve accessibility to and use of basic services and amenities to all residents.</b>	0	0	0	0
SA No 2: <b>Enable vibrant and inclusive communities that participate in decision-making</b>	0	++?	+	0
SA No 3: <b>Reduce social exclusion and poverty</b>	0	0	0	0
SA No 4: <b>Improve health, reduce health inequalities and promote active living</b>	+	+	+	++
SA No 5: <b>Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs</b>	++?	++?	0	++
SA No 6:	+	+	++?	+

<b>To reduce crime, disorder and fear of crime</b>				
SA No 7: <b>To encourage increased cultural and recreational activities across all sectors of the community</b>	0	0	0	0
SA No 8a: <b>To protect and enhance landscapes, local countryside, open spaces</b>	0	+	+	0
SA No 8b: <b>To protect and enhance the historic environment, and the setting of heritage assets</b>	0?	+	0	0?
SA No 9: <b>To protect and enhance biodiversity</b>	Scoped out			
SA No 10: <b>Promote a high quality built environment by improving design &amp; layout &amp; encourage local distinctiveness</b>	0	0	0	0
SA No 11: <b>Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	0	+	+	+
SA No 12: <b>Minimise and manage the risk of flooding &amp; the impacts of climate change</b>	Scoped out			
SA No 13: <b>To minimise greenhouse gas emissions and energy use, increase energy efficiency &amp; renewable energy</b>	0	0	0	0
SA No 14: <b>To minimise use of water, minerals and other natural resources</b>	0	0	0	0
SA No 15: <b>To reduce travel by car and air</b>	0	0	0	0
SA No 16: <b>To reduce pollution and waste generation and increase levels of reuse and recycling</b>	0	+	+	+
SA No 17: <b>To meet local needs locally</b>	+	+	0	0
SA No 18: <b>To improve Coventry's economy</b>	Scoped out			
SA No 19: <b>To ensure access to good quality employment opportunities for all</b>	Scoped out			
SA No 20: <b>Good education and training opportunities for all</b>	Scoped out			

4.13 There were several SA objectives for which the HMO policies had only a negligible or neutral effect. SA No 3 focuses on reducing social exclusion and poverty; the HMO DPD policies will not in themselves reduce poverty as defined by the SA sub-objectives and therefore, neutral effects. SA No 7 focuses on encouraging increased cultural and recreational activities; the HMO policies will not in themselves affect cultural and recreational activities and therefore, neutral effects.

4.14 Objective SA No 10 seeks to promote a high quality built environment by improving design and layout of new development; the HMO policies in

themselves will not affect a high quality built environment as defined by the sub-objectives and therefore, neutral effects. SA No 13 is focused on mechanisms to minimise greenhouse gas emissions – this will be promoted through other Policies in the CLP and therefore, neutral effects from the HMO DPD in itself.

- 4.15 The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives for water, land and energy. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.
- 4.16 SA No 15 seeks to reduce travel by car. The Council will consider the accessibility to local amenities and public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised. Nonetheless, the implications overall for reducing car travel are likely to be negligible and therefore, neutral effects.
- 4.17 Objective SA No 2 aims to enable vibrant and inclusive communities, including to reduce the potential for social isolation particularly with regard to potentially disadvantaged groups. The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people<sup>25</sup>. This indicates that currently communities tend to be balanced.
- 4.18 The Council recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs – and already experienced in some areas. Thus, the intention of Policy HMO2 with thresholds and concentrations is to mitigate/reduce the likely negative effects on the vibrancy and inclusivity of communities by limiting further HMOs in areas where there are already causing negative effects. In this way, the DPD is resolving an existing sustainability problem.
- 4.19 The concentration of 10% or more of all dwellings within 100m radius of the centre point of the application property has been carefully selected after research on other similar cities in England and determining what was appropriate and deliverable. It is considered that 10% is a modest threshold given the size and scale of the problem. Therefore, likely major positive effects indicated as the policy is resolving an existing sustainability problem of unbalanced communities due to an over-concentration of HMOs in some areas, particularly for student shared accommodation where there is transience and short-term living with perhaps different lifestyles to nearby residents. Some uncertainty of the precise level of significance and noting that the situation will change in time as more purpose built student accommodation (PBSA) becomes established.

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<sup>25</sup> Coventry City Council (2022) Supporting Case for Homes in Multiple Occupation (HMOs)

- 4.20 SA No 4 aims to improve health, reduce health inequalities and promote active living. The provision of good quality housing, amenity, accessibility to services/facilities and green/open spaces, active travel and lifestyle all contribute to good health.<sup>26</sup> By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions, all four DPD policies are likely to have minor positive effects on health objectives.
- 4.21 For Policy HMO4, all the requirements set out in criteria (a) – (f) in are likely to have positive effects on health and wellbeing, including considerations of suitable space for households, no adverse nuisance impacts from increased noise, disturbance or activities, safe and secure external space, and suitable waste management. Thus, major positive effects are indicated that will be cumulative in the longer term. It may be noted that concerns about health and wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process<sup>27</sup>.
- 4.22 Objective SA No 5 aims to provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs. The DPD is taking a proactive approach to manage the potential negative effects that could arise for housing balance as the need for HMOs is met locally. The requirements in HMO1 for good access and provision of satisfactory living conditions ensure that the SA objectives for housing are supported. The concentrations and thresholds set out in HMO2 will ensure that housing is more balanced by avoiding concentrations of HMOs. The requirements in HMO4 for suitable amenity and design ensure that the SA objectives for housing are supported. Policy HMO3 on sandwiching is not directly relevant to housing objectives and therefore, neutral effects.
- 4.23 The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character. There is some concern that the HMO will limit certain housing types, especially student accommodation.<sup>28</sup> However, this is not the intention of the DPD and as the provision of PBSA increases, the likely cumulative negative effects in certain areas will reduce. The DPD is responding to an identified need in housing and objectives to provide decent and affordable housing for all; thus, overall major positive effects indicated.
- 4.24 SA No 6 aims to reduce crime, disorder and fear of crime. It is understood that some residents have been concerned about increases in anti-social behaviour associated with HMOs. The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations and that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour; therefore, minor positive effects indicated for all four policies. Through Policy HMO3, avoiding localised intensification by avoiding sandwiching of HMOs may have further positive effects on reducing the likelihood of anti-social behaviour as communities will

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<sup>26</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

<sup>27</sup> <https://www.coventry.gov.uk/housing-enforcement/hmo-licensing>

<sup>28</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

be more balanced – some uncertainty of precise significance as this depends on specific locations. The criterion (e) in Policy HMO4 specifically requires the design of the external space to be safe and secure – with minor positive effects.

- 4.25 SA No 17 aims to meet local needs locally. One of the sub-objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through HMO1-HMO2 and mitigating potential negative effects, the Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally. Policy HMO3 only seeks to avoid sandwiching; it does not affect the ability of HMOs to meet local needs locally – not applicable, neutral effects. Policy HMO4 is not directly relevant to meeting local needs locally and neutral effects indicated.

### **Townscape/Landscape & Historic Environment**

- 4.26 Objective SA No 8 aims to protect and enhance landscapes, open spaces, and the historic environment and its setting. Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance; Policy HMO4 includes requirements in criterion (b) to ensure no demonstrable adverse impact on character. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design and R2 City Centre. Therefore, potential negative effects are mitigated by policy requirements and overall, neutral effects.
- 4.27 It is the deterioration of the visual amenity that can have particular negative effects where there is intensification. Therefore, Policies HMO2 and HMO3 that seek to reduce or avoid cumulative negative effects by more proactively managing concentrations and/or sandwiching of HMOs are likely to have positive effects.
- 4.28 Historic England raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs and there is a need to carefully convert them taking into account historic assets. The historic environment is addressed through other CLP Policies, such as DE1, HE1-2, and R2, with neutral effects for the HMO DPD. However, the provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated for Policy HMO2.

### **Air, Soil, Water, Light & Noise Pollution**

- 4.29 Objective SA No 11 is concerned with enhancing the quality of, and minimising pollution of air, soil, water, light and noise. SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste. Poor air quality in the UK is mostly associated with

road traffic and the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>29</sup>. The Council also has an Air Quality SPD (2019)<sup>30</sup> to help guide development schemes with regard to emissions. Concern has been raised about the increase in numbers of cars and parking for HMOs – all of which could have implications for air quality.

- 4.30 The Council will consider the accessibility to local amenities and public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised. The potential negative effects for nuisance odour and air quality from road traffic associated with cumulative effects from sandwiching are mitigated by the policy requirements in HMO2 and HMO3 that avoid intensification. Criterion (f) of Policy HMO4 requires proposals to include provision of suitably designed refuse bin storage that is not visible from the public realm. Criteria (b) and (d) make specific requirements regarding nuisance noise thus avoiding potential adverse effects. Therefore, overall, likely minor positive effects for policies HMO2-4 as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.

### Waste Management

- 4.31 Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive and unsatisfactory waste generation and storage associated with HMOs. Policy HMO1 requires that proposals should meet with requirements in Policy HMO4 that includes a criterion on refuse management. Therefore, neutral effects for HMO1 as the potential for negative effects associated with wastes have been mitigated through policy requirements. The provision of concentrations & threshold, together with avoidance of sandwiching of HMOs, will better ensure that the intentions are deliverable and that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.

### Implementation of the HMO DPD as a Whole

- 4.32 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 mitigated.
- 4.33 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

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<sup>29</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<sup>30</sup> [https://www.coventry.gov.uk/downloads/download/5199/air\\_quality\\_supplementary\\_planning\\_document\\_spd](https://www.coventry.gov.uk/downloads/download/5199/air_quality_supplementary_planning_document_spd)

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.

## 5 IMPLEMENTATION & MONITORING

- 5.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>31</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the local plan itself. Government requires local planning authorities to produce Monitoring Reports (AMRs), and the Coventry Authority Monitoring Report (AMR)<sup>32</sup> (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

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<sup>31</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>32</sup> [https://www.coventry.gov.uk/downloads/download/2678/annual\\_monitoring\\_reports](https://www.coventry.gov.uk/downloads/download/2678/annual_monitoring_reports)

## 6 CONCLUSION & NEXT STEPS

- 6.1 The SA has been utilised in an iterative and ongoing way to inform decision-making for the development of the HMO DPD. The SA helped confirm that there were no suitable alternatives to the proposals in the DPD that needed testing through the SA process. The DPD addresses one specific issue and thus, it is limited in its scale and sphere of influence. The SA investigated the four draft Policies in the DPD through the SA framework of objectives for sustainable development.
- 6.2 Overall, the SA found that there was strong mitigation provided through policy requirements to mitigate potential negative effects for amenity and character of Coventry areas. This included consideration of avoiding/reducing likely cumulative effects for social isolation, anti-social behaviour, amenity and visual impacts, poor air quality and traffic/parking, nuisance noise, and poor waste management.
- 6.3 The SA found positive effects for objectives on housing, balanced communities, and health and wellbeing. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character. The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented. This will resolve existing sustainability problems, and avoid exacerbation of further cumulative negative effects such that overall positive effects are indicated. There were no residual likely negative effects.
- 6.4 This SA/SEA Report is accompanying the draft HMO DPD on formal and public Regulation 19 consultation through the Council's website in early 2023. The Regulation 19 draft DPD and supporting evidence, including this SA Report, will then be submitted to the Secretary of State. Any representations made on the draft plan and the SA will also be provided to the Inspector to be appointed in due course for independent examination of the draft DPD.

## **APPENDICES**

**I: Statement on Compliance with SEA Directive & Regulations**

**II: SA Scoping Report – available separately**

**III: Consultation Representations & Responses**

**IV: SA of Options for Thresholds & Concentrations**

**V: SA of Policies**

## Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive<sup>33</sup> (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)<sup>34</sup>. This is Appendix 1 of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Report (December 2022) – and in accordance with paragraph 32 of the National Planning Policy Framework (2021)<sup>35</sup>.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out the objectives of the Homes in Multiple Occupation Development Planning Document
	Section 3 Context & Baseline	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2022)
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the HMO DPD area. The information is set out in more detail in the SA Scoping Report (2022) that also indicates the likely evolution of current conditions and trends where available

<sup>33</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>34</sup> <http://www.parliament.uk/documents/post/postpn223.pdf>

<sup>35</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised in Section 3 of SA Report; where relevant and available this information is detailed in the SA Scoping Report
<i>Any existing environmental problems which are relevant to the plan including, in particular, those relation to any areas of a particular environmental importance</i>	Section 3 Context & Baseline	Summarises existing sustainability (including environmental problems) for the DPD area. This section also summarises information for Natura 2000 sites in line with Habitats Regulations Assessment requirements.
<i>The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i>	Section 2 SA Methods Section 3 Context & Baseline	Provides the summary of objectives for sustainability in the DPD area (including environmental objectives) and the implications of these objectives for the DPD (refers to details in the SA Scoping Report 2022); explains how the environmental considerations have been taken into account.
<i>The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary,</i>	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that includes the issues listed by the SEA Regulations and are progressed by which SA objectives. This ensures that all relevant issues are considered during the assessment of each policy of the DPD.
	Section 4 Appendix V	Summarises the likely significant effects of implementing the DPD (including environmental effects) with details provided in the appendix. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</i>		
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Section 4 Appendix V	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are summarised in the main report, detailed in the appraisal matrices that comprise the appendices.
<i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>	Section 4 & Appendix IV	The reasons for progressing the preferred option and not taking others forward are presented in Section 4 – para 4.9-4.11.
	Sections 2 & 3 Methods & Context, Baseline; paras 4.1-4.11	Outlines how the assessment was undertaken – the appraisal methodology and any difficulties encountered in compiling information are noted.
<i>A description of the measures envisaged concerning monitoring</i>	Section 5	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the DPD.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>A non-technical summary of the information provided under the above headings</i>	Report preface (available separately)	Provides a non-technical summary.

## Appendix III: Consultation Representations & Responses

### Consultation Representations to SA Scoping Report (April 2022)

Section of SA Scoping Report	Consultee Comments	Enfusion Responses & Action Taken
<b>Environment Agency</b>		
	No comment received	Noted
<b>Historic England</b>		
Chapter 4 Climate Change	One recent publication is Historic England's Climate Change Strategy, March 2022, which we suggest referencing in the SA. Understanding the effects of climate change on the historic environment is important and we suggest that reference is made to this within the SA Scoping document, particularly as Coventry has a lot of older housing stock, some of which will be, or may become, HMOs. Specific projects or actions may be needed to improve the resilience of heritage assets to climate change and plans should set these out. The following links may be of assistance:	Noted, with thanks & added to the SA Scoping Report
Chapter 8 Historic Environment	We welcome the recognition that there may be localised issues/opportunities relating to HMOs and we are pleased to see the retention from the Coventry Local Plan of SA Objective No 8: <i>To protect and enhance landscape, local countryside, open spaces and the historic environment.</i>	Noted, with thanks
Chapter 9 Landscape	Historic England welcomes the recognition given in the SA Scoping document of issues and opportunities for protecting and enhancing the local landscape. Again, we are therefore pleased to see the retention from the Coventry Local Plan of SA Objective No 8: <i>To protect and enhance landscape, local countryside, open spaces and the historic environment.</i>	Noted, with thanks.
Chapter 10 SA Framework	Historic England welcomes SA Objective No 8: <i>"To protect and enhance landscapes, local countryside, open spaces and the historic environment"</i> . However, we suggest that the setting of heritage assets, historic settlements and conservation areas is also referenced within the sub-objectives.	"and their setting" added to SA Objective No 8 Explicit mention of <i>heritage assets, historic settlements and conservation areas &amp; their setting</i> added to first sub-objective

Section of SA Scoping Report	Consultee Comments	Enfusion Responses & Action Taken
	<p>We also welcome SA Objective No 13: <i>"To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources"</i>. However, we suggest adding some further decision making criteria to reflect wider sustainability issues regarding the historic environment, such as improving the energy efficiency of historic buildings and taking into account their embodied carbon value when considering the retention and re-use, versus their replacement.</p>	
Chapter 10 Proposed Approach	<p>Historic England is concerned that it is not clear from the document as to how impacts will be evaluated, as there is no evaluation method, or scoring mechanism, for assessment included, although we acknowledge that paragraph 10.5 alludes to testing policies to determine the nature of their likely sustainability effects. The document does not therefore set out how policies will be assessed or provide detailed information about how potential significant effects will be identified (both positive and negative); for example, using professional judgement and reference to evidence base documents. We strongly recommend that this is included within a revised SA Scoping document and would be happy to discuss any assessment methodology for the historic environment with you ahead of the SA being developed further./</p>	<p>Para 10.5 explains that professional judgment will be used for the assessment stage using the SA framework of objectives with reference to the baseline information, and aligned with table 10.2 for significance. Sensitivity of receptors will vary depending upon sustainability topic. A narrative approach will be taken as appropriate for the SA of this specific DPD. Only 4 policies specific to the issues for HMOs are being proposed. It is not considered necessary/relevant (or possible) to develop specific &amp; quantitative thresholds for each sub-objective.</p>
SA Scoping	<p>Overall, Historic England considers that the amendments to the scope of the SA for Coventry City Council's HMO DPD, as set out above, are necessary to ensure that it meets the requirements of the Directive and Legislation in relation to heritage. The changes suggested will ensure compliance in this respect and will ensure the development of an appropriate framework for assessing the significant effects which this DPD may have upon the historic environment of Coventry. Historic England would be happy to provide further comments as the Sustainability Appraisal for Coventry City</p>	<p>Noted, with thanks</p>

Section of SA Scoping Report	Consultee Comments	Enfusion Responses & Action Taken
	Council's HMO DPD is progressed over the coming months.	
<b>Natural England</b>		
SA Report	Agree with conclusion reached	Noted, with thanks

### Consultation Representations to Draft Reg 18 HMO DPD & relevant to SA (April 2022)

Section of Reg 18 DPD Draft	Consultee Comments relevant to SA/SEA	Enfusion Responses & Action Taken
<b>Residents</b>		
Draft Policy HMO2	<p><b>Concentrations &amp; Thresholds</b></p> <p>Several residents expressed concern about the proposed concentration of 10% or more of all dwellings and within 100m radius of the centre point of the application property – where there is an existing HMO concentration, applications will not be supported.</p> <p>Residents are concerned that this may not reflect the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing. Some residents suggested that the Council should consider different concentrations and different thresholds, and for example, suggested 5% and 750m radius.</p>	<p>The Council has set out in the policy supporting text the reasoning for proposing a concentration of 10% or more and within 100m radius.</p> <p>A single threshold of 10% is modest in consideration of issue to be addressed; research based on similar size cities already implementing an HMO policy indicates that this threshold is appropriate &amp; reasonable.</p> <p>High concentrations of HMOs are already having an adverse impact on character &amp; amenity; the Council aims to help maintain mixed &amp; balanced communities.</p> <p>The Council does not consider that there are any other reasonable (deliverable) alternatives that are relevant &amp; that would need to be tested through SA.</p>

## Appendix IV: SA of Options for Thresholds & Concentrations

Sustainability Appraisal Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	Threshold 5%	Threshold 10%	Concentration 100m	Concentration 750m
<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The aims of the HMO DPD is to ensure that potentially harmful concentrations of HMOs do not arise & that a high standard of accommodation & amenity is created. Variations to thresholds & concentrations will not have any specific effects on making accessibility to local services mor affordable or more sustainable & therefore, neutral effect.	0	0	0	0
<b>2: Enable vibrant and inclusive communities that participate in decision-making</b>	The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people <sup>36</sup> . This indicates that currently communities tend to be balanced. It is understood that patterns of supply and demand will change over time. The number of student shared houses may change as there is increasing provision of purpose built student accommodation (PBSA). Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining area; new areas may be identified. It is likely that students will still predominate near the universities. The proposed eleven wards to be included in the Article 4 Direction already have varying levels of existing HMO concentrations. <sup>37</sup> However the proposed policy is intended to apply to the city as a whole.	++?	+++?	+++?	++?

<sup>36</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

<sup>37</sup> Ibid

	<p>The Council recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs – and already experienced in some areas. Thus, the intention of the thresholds &amp; concentrations is to mitigate/reduce the likely negative effects on the vibrancy and inclusivity of communities by limiting further HMOs in areas where there are already causing negative effects.</p> <p>The concentration of 10% or more of all dwellings within 100m radius of the centre point of the application property has been carefully selected after research on other similar cities in England &amp; determining what was appropriate &amp; deliverable. Therefore, likely major positive effects indicated as the policy is resolving an existing sustainability problem of unbalanced communities due to an over-concentration of HMOs in some areas, particularly for student shared accommodation where there is transience &amp; short-term living with perhaps different lifestyles to nearby residents. Restricting the concentration to where there are existing HMOs to only 5% and/or extending the radius to beyond 750m is less likely to resolve existing problems of unbalanced communities. There may still be a focus of HMOs in certain areas such that the objectives for balanced communities &amp; affordable housing for all are not so well progressed - therefore, only minor positive effects.</p> <p>Some uncertainty of the precise level of significance &amp; noting that the situation will change in time as more PBSA becomes established.</p>				
<b>3: Reduce social exclusion and poverty</b>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>38</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<sup>38</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>There is some concern<sup>39</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people &amp; those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. The concentrations and thresholds seek to mitigate/reduce potential negative effects on amenity &amp; character. Therefore, no significant effects on social inclusion and overall, neutral effects.</p>				
<b>4: Improve health, reduce health inequalities and promote active living</b>	<p>The provision of good quality housing, amenity, accessibility to services/facilities &amp; green/open spaces, active travel &amp; lifestyle all contribute to good health.<sup>40</sup></p>	+	+	+	+
	<p>By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions<sup>41</sup>, the DPD is likely to have minor positive effects on health objectives. It may be noted that concerns about health &amp; wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process.</p> <p>It is assumed that applications for HMOS will be subject to building control regulation &amp; any other applicable standards that ensure the adequacy of the building for the purposes of housing. The Council will make a judgment on satisfactory living conditions according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects associated with healthy housing are mitigated. Minor positive effects indicated for health objectives through provision of a particular type of housing – effects not significantly influenced by options for thresholds or concentrations.</p>				

<sup>39</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>40</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

<sup>41</sup> Adequate housing defined as housing which meets minimum structural, heating, lighting, ventilation, sanitary, occupancy, and maintenance standards compatible with applicable building and housing codes, as determined under rules of the authority <https://www.lawinsider.com/dictionary/adequate-housing>

<b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b>	<p>The changing demographic &amp; economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity &amp; character. There is some concern that the HMO will limit certain housing types, especially student accommodation.<sup>42</sup> However, as the provision of PBSA increases, the likely cumulative negative effects in certain areas will reduce.</p> <p>The DPD is responding to an identified need in housing &amp; thus, overall major positive effects through provision of a particular type of housing with identified need – effects not significantly influenced by options for thresholds or concentrations. However, by reducing the concentration threshold to 5% existing HMOs, there may be less support for progressing HMOs (as the concentration might be considered to be too restrictive) - and this type of housing is an important identified need, so that the positive effects may be reduced to minor. Similarly, if the distance is extended to 750m, this would seem to extend the concentration of HMOs and limit the areas to which the DPD would apply – therefore, potential for not progressing the housing objectives &amp; positive effects reduced to minor.</p> <p>Some uncertainty as the extent of the significance of the positive effects is unclear at this stage.</p>	+?	++?	++?	+?
<b>6: To reduce crime, disorder and fear of crime</b>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp; sexual offences.<sup>43</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; mitigation measures are implemented to help resolve an existing sustainability</p>	+?	+	+	+?

<sup>42</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>43</sup> <https://crimerate.co.uk/west-midlands/coventry>

	problem. Therefore, minor positive effects are indicated but these are less certain if the DPD only applies to where there is a concentration of 5% and/or a 750m radius – less likely to resolve an existing sustainability problem when applied across the city as whole.				
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations & that they meet with various requirements that are more likely to limit the potential for negative effects on cultural & recreational activities. This is unlikely to be influenced significantly by options for thresholds and concentrations; therefore, likely neutral effects.	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design & R2 City Centre. Therefore, potential negative effects mitigated by policy requirements & overall, neutral effects.	<b>++?</b>	<b>+</b>	<b>+</b>	<b>-?</b>
	The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. 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. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out to 750m, the risk of adverse effects on amenity/townscape are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs & potential for minor negative effects as accumulation continues. Retaining the distance to 100m, mitigation is more certain & resolution of the existing sustainability problems.				
	HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs & there is a need to carefully convert them taking into account historic assets & also with regard to climate change (see also later SA No 13).	<b>++?</b>	<b>+</b>	<b>+</b>	<b>-?</b>

	<p>The historic environment is addressed through other CLP Policies, such as DE1, HE1-2, &amp; R2. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. 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. This indicates further positive effects overall but uncertainty of precise significance.</p> <p>By extending the distance out of 750m, the risk of adverse effects on the historic environment are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs &amp; risk of minor negative effects. Retaining the distance to 100m, mitigation is more certain &amp; resolution of the existing sustainability problems.</p>				
<b>9: Biodiversity</b>	Scoped out				
<b>10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments</b>	<p>The aims of the HMO DPD is to ensure that potentially harmful concentrations of HMOs do not arise &amp; that a high standard of accommodation &amp; amenity is created. It is not directly associated with design – covered by other CLP policies - and therefore, neutral effects.</p>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	<p>SA objectives relating to contaminated land, water quality, and soils are not applicable.</p> <p>Some concern has been raised about nuisance odour, particularly associated with management of waste.</p> <p>Poor air quality in the UK is mostly associated with road traffic &amp; the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>44</sup>. Concern has been raised about the increase in numbers of</p>	<b>++?</b>	<b>+</b>	<b>+</b>	<b>-?</b>

<sup>44</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

	<p>cars &amp; parking for HMOs – all of which could have implications for air quality. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; that mitigation measures are implemented to resolve existing sustainability problems such that minor positive effects are indicated.</p> <p>The Council will consider the accessibility to local amenities &amp; public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.</p> <p>Minor positive effects as the potential for negative effects on nuisance odour or air quality associated with road traffic 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. This indicates further positive effects overall but uncertainty of precise significance.</p> <p>By extending the distance out to 750m, the risk of adverse effects on nuisance odour &amp; air quality are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs &amp; risk of negative effects. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems &amp; confirming likely positive effects.</p>				
<b>12: Flood Risk</b>	Scoped out				
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<b>generated from renewable resources</b>					
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs.	<b>++?</b>	<b>+</b>	<b>+</b>	<b>-?</b>
	The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. 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. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out of 750m, the risk of adverse effects associated with poor waste management are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs – potential for negative effects as accumulation continues. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems & confirming likely positive effects.				
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through application of concentrations & thresholds to mitigate potential & existing negative effects, the	<b>++?</b>	<b>+</b>	<b>+</b>	<b>++?</b>

	<p>Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally.</p> <p>By reducing the concentration of HMOs to 5%, there may be less support for progressing HMOs (as the concentration might be considered to be too restrictive) - and this type of housing is an important identified need, so that the positive effects may be reduced to minor. Similarly, if the distance is extended to 750m, this would seem to extend the concentration of HMOs and limit the areas to which the DPD would apply – therefore, potential for not progressing the housing objectives &amp; some uncertainty about the positive effects for meeting local needs locally.</p>				
<b>18: Economy</b>	Scoped out				
<b>19: Employment</b>	Scoped out				
<b>20: Education &amp; Training</b>	Scoped out				

## Appendix V: SA of Policies

<b>Policy HMO1</b>	<p><b>HMOs:</b> All proposals for the provision of HMOs will be required to demonstrate that:</p> <p>a) there is good accessibility to local amenities and public transport;</p> <p>b) they accord with the emerging Accessible Homes standards<sup>[2]</sup> (or future equivalent) and provide satisfactory living conditions for the intended occupiers; and</p> <p>c) there will be no demonstrably adverse impact on the amenity of neighbouring properties or the character of the area by way of character, appearance, highway safety and parking. The proposal must also meet the criteria in draft policy HMO4.</p>
<b>Policy HMO2</b>	<p><b>CONCENTRATIONS &amp; THRESHOLDS:</b> Where there is an existing HMO concentration of 10% or more of all dwellings within 100 metres radius of the centre point of the application property, HMO applications will not be supported. Where there is an existing HMO concentration of less than 10% within 100 metres radius of the centre point of the application property, HMO applications will be considered against the other Policies in this DPD and all other relevant policies.</p>
<b>Policy HMO3</b>	<p><b>SANDWICHING:</b> Proposals for the provision of HMOs must not result in a non-HMO dwelling being sandwiched between two HMOs and must not lead to a continuous frontage of three or more HMOs.</p> <p>Sandwiching includes:</p> <ul style="list-style-type: none"><li>• Up to three single residential properties in a street located between two single HMO properties;</li><li>• Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;</li><li>• A residential flat within a sub-divided building where the majority of flats are HMOs.</li><li>• A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;</li><li>• A residential flat within a sub-divided building located between two HMO flats above and below; and</li><li>• A residential flat within a sub-divided building located between two HMO flats on both sides.</li></ul>

<b>Policy HMO4</b>	<p><b>AMENITY &amp; DESIGN:</b> All proposals for the provision of HMOs will be assessed against the following criteria:</p> <p>a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated;</p> <p>b) There would be no demonstrably adverse impact on the amenity of neighbouring properties and the character of the surrounding area in particular through increased activity, noise or disturbance;</p> <p>c) The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements* and light and ventilation;</p> <p>d) The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation;</p> <p>e) The design of external space is safe and secure, and includes provision for refuse storage, washing facilities and adequate vehicular and cycle parking, and ensures access to outdoor amenity space; and</p> <p>f) Refuse bin storage is provided externally within the curtilage of the property, within a suitably designed structure and the refuse bin not visible from the public realm.</p>
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#### Significance Key

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

Policy HMO1 Homes in Multiple Occupation		
Sustainability Appraisal Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The Policy requires that all proposals for provision of HMOs should have good accessibility to local amenities and public transport. However, it does not define what "good access" represents. Accessibility standards for walkability vary according to the type of facility/service, the number of people required to support it, the density of the area and the local geography. <sup>45</sup> The provision of HMOs will not have any effects on improving accessibility or make access more affordable. The Council will make a judgment on good access according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects are mitigated – therefore, neutral effect.	<b>0</b>
<b>2: Enable vibrant and inclusive communities that participate in decision-making</b>	The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people <sup>46</sup> . This indicates that currently communities tend to be balanced. It is understood that some residents were concerned during the Issues & Preferred Option DPD consultation about a concentration of HMOs in certain parts of the city – those with a lower density & characterised by fewer larger houses. This could result in an unbalanced community with the potential for social isolation, in particular for older people who may often characterise such areas, and the transient shorter-term & different lifestyle that typically may characterise student accommodation.  The Council has already recognised the potential for cumulative negative effects on communities & risk of social isolation in areas where HMOs have accumulated. There is the intention for an Article 4 designation to remove PDRs changing the use of a C3 property (dwelling house) to a C4 property	<b>0</b>

<sup>45</sup> Barton, Grant & Guise (3<sup>rd</sup> edition 2021) Shaping Neighbourhoods for Local Health & Global Sustainability

<sup>46</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

	<p>(house in multiple occupation) in certain wards of the city – and this will help mitigate negative effects when implemented.</p> <p>Nonetheless, the Council still recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs. Mitigation for such cumulative effects is provided by the requirement for applications to be assessed using criteria in Policies HMO01 &amp; HMO04 that aim to resolve potential amenity impacts that could affect potential groups of people such as the elderly – therefore, neutral effects.</p>	
<b>3: Reduce social exclusion and poverty</b>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>47</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p> <p>There is some concern<sup>48</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people &amp; those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. Therefore, no significant effects on social inclusion and overall, neutral effects.</p>	<b>0</b>
<b>4: Improve health, reduce health inequalities and promote active living</b>	<p>The provision of good quality housing, amenity, accessibility to services/facilities &amp; green/open spaces, active travel &amp; lifestyle all contribute to good health.<sup>49</sup></p>	<b>+</b>

<sup>47</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>48</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>49</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

	<p>By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions<sup>50</sup>, the DPD is likely to have minor positive effects on health objectives. Policy HMO1 requires proposals to meet with the criteria in Policy HMO4 which includes requirements for HMO licensing.<sup>51</sup></p> <p>It may be noted that concerns about health &amp; wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process.</p> <p>It is assumed that applications for HMOS will be subject to building control regulation &amp; any other applicable standards that ensure the adequacy of the building for the purposes of housing. The Council will make a judgment on satisfactory living conditions according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects associated with healthy housing are mitigated.</p>	
<b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b>	The changing demographic & economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The requirements in HMO1 for good access & provision of satisfactory living conditions ensure that the SA objectives for housing are supported. The DPD is responding to an identified need in housing & thus, overall major positive effects indicated with some uncertainty as the extent of the significance of the positive effects is unclear at this stage.	<b>++?</b>
<b>6: To reduce crime, disorder and fear of crime</b>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp; sexual offences.<sup>52</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. Therefore, minor positive effects are indicated.</p>	<b>+</b>
<b>7: To encourage increased cultural and</b>		<b>0</b>

<sup>50</sup> Adequate housing defined as housing which meets minimum structural, heating, lighting, ventilation, sanitary, occupancy, and maintenance standards compatible with applicable building and housing codes, as determined under rules of the authority <https://www.lawinsider.com/dictionary/adequate-housing>

<sup>51</sup> <https://www.coventry.gov.uk/housing-enforcement/hmo-licensing>

<sup>52</sup> <https://crimedata.co.uk/west-midlands/coventry>

<b>recreational activities across all sectors of the community</b>	The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations & that they meet with various requirements that are more likely to limit the potential for negative effects on cultural & recreational activities. The Council has recognised the possibilities for cumulative adverse effects & made provision for requirements to mitigate negative effects, including on cultural & recreational facilities. Therefore, potential negative effects mitigated by policy requirements & overall, neutral effects.	
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design & R2 City Centre. Therefore, potential negative effects mitigated by policy requirements & overall, neutral effects.	<b>0</b>
	HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs & there is a need to carefully convert them taking into account historic assets & also with regard to climate change (see also later SA No 13). It is suggested that the Council consider adding "and historic assets & their setting" to criterion c in HMO01 to make explicit that the historic environment is included in character & appearance of an area. Nonetheless, the historic environment is addressed through other CLP Policies, such as DE1, HE1-2, & R2. Therefore, likely neutral effects through mitigation in policy wording, but some uncertainty as to precise significance with regard to the historic environment.	<b>0?</b>
<b>9: Biodiversity</b>	Scoped out	
<b>10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments</b>	Policy HMO1 requires no demonstrative adverse impact on character or appearance. Proposals will be required to meet with other CLP policies, including DE1 High Quality Design – therefore, neutral effects.	<b>0</b>
<b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste. Policy HMO1 requires proposals to meet with HMO4 which includes a criterion addressing refuse disposal/storage.	<b>0</b>

	<p>Poor air quality in the UK is mostly associated with road traffic &amp; the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>53</sup>. Concern has been raised about the increase in numbers of cars &amp; parking for HMOs – all of which could have implications for air quality. Policy HMO1 requires that there will be no demonstrable adverse impact on highway safety and parking, indicating that there will be no significant increase in the poor air quality associated with road traffic. The Council will consider the accessibility to local amenities &amp; public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.</p> <p>Therefore, neutral effects as the potential for negative effects on nuisance odour or air quality associated with road traffic has been mitigated through policy requirements.</p>	
<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	<b>0</b>
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs. Policy HMO1 requires that proposals should meet with requirements in Policy HMO4 that includes a criterion on refuse	<b>0</b>

<sup>53</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<b>and increase levels of reuse and recycling</b>	management. Therefore, neutral effects as the potential for negative effects associated with wastes have been mitigated through policy requirements.	
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through HMO1 and mitigating potential negative effects, the Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally.	<b>+</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	
<b>20: Education &amp; Training</b>	Scoped out	

<b>Policy HMO2 Concentrations &amp; Thresholds</b>		
<b>Sustainability Appraisal Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The Policy aims to ensure that potentially harmful concentrations of HMOs do not arise & that a high standard of accommodation & amenity is created. This will not have any specific effects on improving accessibility to local services & therefore, neutral effect.	<b>0</b>
<b>2: Enable vibrant and inclusive communities</b>	The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly	<b>++?</b>

<p><b>that participate in decision-making</b></p>	<p>occupied by students, provide accommodation for a range of people<sup>54</sup>. This indicates that currently communities tend to be balanced. It is understood that patterns of supply and demand will change over time. The number of student shared houses may change as there is increasing provision of purpose built student accommodation (PBSA). Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining area; new areas may be identified. It is likely that students will still predominate near the universities. The proposed eleven wards to be included in the Article 4 Direction already have varying levels of existing HMO concentrations.<sup>55</sup> However the proposed policy is intended to apply to the city as a whole.</p> <p>The Council recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs – and already experienced in some areas. Thus, the intention of the thresholds &amp; concentrations is to mitigate/reduce the likely negative effects on the vibrancy and inclusivity of communities by limiting further HMOs in areas where there are already causing negative effects. The concentration of 10% or more of all dwellings within 100m radius of the centre point of the application property has been carefully selected after research on other similar cities in England &amp; determining what was appropriate &amp; deliverable. It is considered that 10% is a modest threshold given the size and scale of the problem. Therefore, likely major positive effects indicated as the policy is resolving an existing sustainability problem of unbalanced communities due to an over-concentration of HMOs in some areas, particularly for student shared accommodation where there is transience &amp; short-term living with perhaps different lifestyles to nearby residents. Some uncertainty of the precise level of significance &amp; noting that the situation will change in time as more PBSA become established.</p>	
<p><b>3: Reduce social exclusion and poverty</b></p>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>56</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p>	<p><b>0</b></p>

<sup>54</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

<sup>55</sup> Ibid

<sup>56</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	There is some concern <sup>57</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people & those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. The concentrations and thresholds seek to mitigate/reduce potential negative effects on amenity & character. Therefore, no significant effects on social inclusion and overall, neutral effects.	
<b>4: Improve health, reduce health inequalities and promote active living</b>	The provision of good quality housing, amenity, accessibility to services/facilities & green/open spaces, active travel & lifestyle all contribute to good health. <sup>58</sup>	+
	By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions <sup>59</sup> , the DPD is likely to have minor positive effects on health objectives. The policy on concentrations & thresholds provides mitigation that is clearly deliverable to limit potential negative effects on amenity & character that might affect health & wellbeing. It may be noted that concerns about health & wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process.  It is assumed that applications for HMOS will be subject to building control regulation & any other applicable standards that ensure the adequacy of the building for the purposes of housing. The Council will make a judgment on satisfactory living conditions according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects associated with healthy housing are mitigated.	
<b>5: Provide decent and affordable housing for</b>	The changing demographic & economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no	++?

<sup>57</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>58</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

<sup>59</sup> Adequate housing defined as housing which meets minimum structural, heating, lighting, ventilation, sanitary, occupancy, and maintenance standards compatible with applicable building and housing codes, as determined under rules of the authority <https://www.lawinsider.com/dictionary/adequate-housing>

<b>all, of the right quantity, type, tenure &amp; affordability for local needs</b>	<p>significant negative effects on amenity &amp; character. There is some concern that the HMO will limit certain housing types, especially student accommodation.<sup>60</sup> However, as the provision of PBSA increases, the likely cumulative negative effects in certain areas will reduce.</p> <p>The DPD is responding to an identified need in housing &amp; thus, overall major positive effects indicated with some uncertainty as the extent of the significance of the positive effects is unclear at this stage.</p>	
<b>6: To reduce crime, disorder and fear of crime</b>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp; sexual offences.<sup>61</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; mitigation measures are implemented to help resolve an existing sustainability problem. Therefore, minor positive effects are indicated.</p>	+
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	<p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for negative effects on cultural &amp; recreational activities.</p> <p>The Council has recognised the possibilities for cumulative adverse effects &amp; made provision for requirements to mitigate negative effects, including on cultural &amp; recreational facilities. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects.</p>	0
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	<p>Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design &amp; R2 City Centre. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.</p>	+
	<p>HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs &amp; there is a need to carefully convert them taking into account historic assets &amp; also with regard to climate change (see also later SA No 13).</p>	+

<sup>60</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>61</sup> <https://crimerate.co.uk/west-midlands/coventry>

	The historic environment is addressed through other CLP Policies, such as DE1, HE1-2, & R2. The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.	
<b>9: Biodiversity</b>	Scoped out	
<b>10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments</b>	Policy HMO2 is concerned with concentrations & thresholds for HMOs; it is not directly associated with design and therefore, neutral effects.	<b>0</b>
<b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	<p>SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste.</p> <p>Poor air quality in the UK is mostly associated with road traffic &amp; the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>62</sup>. Concern has been raised about the increase in numbers of cars &amp; parking for HMOs – all of which could have implications for air quality. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; that mitigation measures are implemented to resolve existing sustainability problems such that minor positive effects are indicated.</p> <p>The Council will consider the accessibility to local amenities &amp; public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.</p> <p>Therefore, minor positive effects as the potential for negative effects on nuisance odour or air quality associated with road traffic has been reduced through limiting HMOs in areas where there are existing sustainability issues.</p>	<b>+</b>

<sup>62</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	<b>0</b>
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs.	<b>+</b>
	The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.	
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through application of concentrations & thresholds to mitigate potential & existing negative effects, the Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally.	<b>+</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	

<b>20: Education &amp; Training</b>	Scoped out	
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<b>Policy HMO3 Sandwiching</b>		
<b>Sustainability Appraisal Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The Policy seeks to avoid a non-HMO dwelling being sandwiched between two HMOs & avoid a continuous frontage of 3 or more HMOs which would represent a localised intensification of HMOs that could have adverse impacts on amenity. This includes seeking to reduce the potential for reduced community services that might result from a shift in retail/business sectors towards a narrower demographic such as a proliferation of hot food takeaways. Therefore, it is ensured that potential cumulative negative effects are mitigated – therefore, neutral effect.	<b>0</b>
<b>2: Enable vibrant and inclusive communities that participate in decision-making</b>	The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people <sup>63</sup> . This indicates that currently communities tend to be balanced. The Council recognises the risk of cumulative negative effects through incremental intensification in an area & the policy seeks to avoid a non-HMO dwelling being sandwiched between two HMOs & avoid a continuous frontage of 3 or more HMOs. This will allow a more balanced population & contribute to more vibrant and inclusive communities with likely minor positive effects.	<b>+</b>

<sup>63</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

<b>3: Reduce social exclusion and poverty</b>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>64</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p> <p>There is some concern<sup>65</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people &amp; those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. Policy HMO3 seeks to avoid localised intensification by avoiding sandwiching - no significant effects on social inclusion and overall, neutral effects.</p>	<b>0</b>
<b>4: Improve health, reduce health inequalities and promote active living</b>	<p>The provision of good quality housing, amenity, accessibility to services/facilities &amp; green/open spaces, active travel &amp; lifestyle all contribute to good health.<sup>66</sup> Overlooking and loss of privacy resulting from intensification of use can affect wellbeing of residents with negative effects. Policy HMO3 seeks to avoid sandwiching, thus reducing the risk of overlooking &amp; loss of privacy with likely minor positive effects.</p>	<b>+</b>
<b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b>	<p>The policy does not seek to limit the number of HMOs but rather to minimise potential adverse impacts on amenity. Overall, this policy will be not applicable or neutral as it does not reduce the effects of HMO1 but rather provides further mitigation.</p>	<b>0</b>
<b>6: To reduce crime, disorder and fear of crime</b>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp;</p>	<b>++?</b>

<sup>64</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>65</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>66</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

	<p>sexual offences.<sup>67</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. Avoiding localised intensification by avoiding sandwiching of HMOs may have major positive effects on reducing the likelihood of anti-social behaviour as communities will be more balanced – some uncertainty of precise significance as depends on specific locations.</p>	
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	<p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for negative effects on cultural &amp; recreational activities.</p> <p>The Council has recognised the possibilities for cumulative adverse effects &amp; made provision for requirements to mitigate negative effects, including on cultural &amp; recreational facilities. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects.</p>	<b>0</b>
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	<p>Policy HMO3 seeks to avoid adverse impacts on amenity &amp; it is the deterioration of the visual amenity that can have particular negative effects where there is intensification. The potential negative effects from sandwiching are mitigated by policy requirements &amp; overall, likely minor positive effects as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.</p>	<b>+</b>
	<p>HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs &amp; there is a need to carefully convert them taking into account historic assets &amp; also with regard to climate change (see also later SA No 13). However, Policy HMO3 is concerned with avoiding localised intensification &amp; the effects on the historic environment &amp; its setting is less applicable or negligible as depends upon the specific location.</p>	<b>0</b>
<b>9: Biodiversity</b>	Scoped out	
<b>10: Promote a high quality built environment by</b>	The avoidance of sandwiching is not directly related to this SA objective and not applicable or neutral effects indicated.	<b>0</b>

<sup>67</sup> <https://crimerate.co.uk/west-midlands/coventry>

<b>improving design and layout and encourage local distinctiveness and stewardship of local environments</b>		
<b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	<p>SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste. Policy HMO3 requires proposals to avoid sandwiching which can have implications for adverse impacts associated with poor refuse disposal/storage through accumulation of waste in a specific area.</p> <p>Poor air quality in the UK is mostly associated with road traffic &amp; the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>68</sup>. Concern has been raised about the increase in numbers of cars &amp; parking for HMOs – all of which could have implications for air quality.</p> <p>The potential negative effects for nuisance odour &amp; air quality from road traffic associated with cumulative effects from sandwiching are mitigated by the policy requirements that avoid intensification. Therefore, overall, likely minor positive effects as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.</p>	+
<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	0

<sup>68</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs. Policy HMO3 seeks to avoid localised intensification thus avoiding the potential for issues associated with poor waste management.	<b>+</b>
	Therefore, overall, likely minor positive effects as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.	
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. Policy HMO3 only seeks to avoid sandwiching; it does not affect the ability of HMOs to meet local needs locally – not applicable, neutral effects.	<b>0</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	
<b>20: Education &amp; Training</b>	Scoped out	

<b>Policy HMO4 Amenity &amp; Design</b>		
<b>Sustainability Appraisal Objective</b>	<b>Assessment of Effects</b>	
	<b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	

<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The provision of HMOs will not have any effects on improving accessibility or make access more affordable; details of design requirements set out in HMO4 are not directly relevant – therefore, neutral effect.	<b>0</b>
<b>2: Enable vibrant and inclusive communities that participate in decision-making</b>	The details of design requirements set out in HMO4 are not directly relevant & therefore, negligible or neutral effects indicated.	<b>0</b>
<b>3: Reduce social exclusion and poverty</b>	The details of design requirements set out in HMO4 are not directly relevant & therefore, negligible or neutral effects indicated.	<b>0</b>
<b>4: Improve health, reduce health inequalities and promote active living</b>	The provision of good quality housing, amenity, accessibility to services/facilities& green/open spaces, active travel & lifestyle all contribute to good health. <sup>69</sup>	<b>++</b>
	All the requirements set out in criteria (a) – (f) in Policy HMO4 are likely to have positive effects on health and wellbeing, including considerations of suitable space for households, no adverse nuisance impacts from increased noise, disturbance or activities, safe & secure external space, and suitable waste management. Major positive effects that will be cumulative in the longer term.	
<b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b>	The changing demographic & economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The requirements in HMO4 for suitable amenity and design ensure that the SA objectives for housing are supported.	<b>++</b>
	The DPD is responding to an identified need in housing & thus, overall major positive effects indicated as decent housing will be ensured through the policy requirements for accommodation spaces – and this will be cumulative in the longer term.	
<b>6: To reduce crime, disorder and fear of crime</b>	As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales & Northern Ireland overall figure. The most common crimes in Coventry are violence &	<b>+</b>

<sup>69</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

	<p>sexual offences.<sup>70</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; criterion (e) in Policy HMO4 specifically requires the design of the external space to be safe &amp; secure – with minor positive effects.</p>	
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	The detailed requirements for design set out in Policy HMO4 are not directly relevant or applicable to SA objectives on culture & recreation – neutral effects.	<b>0</b>
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	<p>Policy HMO4 includes requirements in criterion (b) to ensure no demonstrable adverse impact on character. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design &amp; R2 City Centre. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects.</p> <p>HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs &amp; there is a need to carefully convert them taking into account historic assets &amp; also with regard to climate change (see also later SA No 13). It is suggested that the Council consider adding “and historic assets &amp; their setting” to criterion (b) in HMO4 to make explicit that the historic environment is included in character &amp; appearance of an area. Nonetheless, the historic environment is addressed through other CLP Policies, such as DE1, HE1-2, &amp; R2. Therefore, likely neutral effects through mitigation in policy wording, but some uncertainty as to precise significance with regard to the historic environment.</p>	<b>0?</b>
<b>9: Biodiversity</b>	Scoped out	
<b>10: Promote a high quality built environment</b>	Criterion (b) Policy HMO4 requires no demonstrative adverse impact on character. Proposals will be required to meet with other CLP policies, including DE1 High Quality Design – therefore, neutral effects.	<b>0</b>
<b>11: Enhance quality and minimise air, soil,</b>	SA objectives relating to contaminated land, water quality, and soils are not applicable.	<b>+</b>

<sup>70</sup> <https://crimedata.co.uk/west-midlands/coventry>

<b>water, light and noise pollution levels</b>	<p>Some concern has been raised about nuisance odour, particularly associated with management of waste. Criterion (f) of Policy HMO4 requires proposals to include provision of suitably designed refuse bin storage that is not visible from the public realm.</p> <p>Criteria (b) and (d) make specific requirements regarding nuisance noise thus avoiding potential adverse effects.</p> <p>Therefore, minor positive effects as the potential for negative effects on nuisance odour &amp; noise have been mitigated through policy requirements, &amp; there will be cumulative positive effects in the longer term.</p>	
<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	<b>0</b>
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	<p>Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive &amp; unsatisfactory waste generation &amp; storage associated with HMOs.</p> <p>Policy HMO4 includes criterion (f) that requires external refuse bin storage to be provided externally with a suitably design structure &amp; not visible from the public realm.</p> <p>Therefore, potential for minor positive effects as the potential for negative effects associated with wastes have been mitigated through policy requirements, &amp; managed more proactively such that there will be cumulative effects in the longer term. .</p>	<b>+</b>

<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. Policy HMO4 is not directly relevant to meeting local needs locally & neutral effects indicated.	<b>0</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	
<b>20: Education &amp; Training</b>	Scoped out	