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Coventry City Council

Agenda

Cabinet

Time and Date
2.00 pm on Tuesday, 11 July, 2023

Place
Council Chamber - Council House, Coventry

Public Business

1. **Apologies**

2. **Declarations of Interest**

3. **Minutes** (Pages 3 - 6)

   (a) To agree the minutes from the meeting of Cabinet on 13th June 2023

   (b) Matters arising

4. **Exclusion of Press and Public**

   To consider whether to exclude the press and public for the item of private business for the reasons shown in the report.

5. **Palmer Lane Regeneration 2023 Update** (Pages 7 - 20)

   Report of the Director of Transportation and Highways

6. **Reorganisation of the Coventry and Warwickshire Growth Hub** (Pages 21 - 30)

   Report of the Director of Business, Investment and Culture

7. **Local Plan Regulation 18 - Issues and Options Consultation** (Pages 31 - 272)

   Report of the Director of Streetscene and Regulatory Services

8. **Revenue and Capital Outturn 2022/23** (Pages 273 - 306)

   Report of the Chief Operating Officer (Section 151 Officer)

9. **Children's Residential Children's Home Strategy** (Pages 307 - 364)

   Report of the Director of Children’s Services

10. **Outstanding Issues**

There are no outstanding issues

11. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Private Business

12. **Children's Residential Children's Home Strategy** (Pages 365 - 428)

Report of the Director of Children's Services

(Listing Officer: A Whitrick, email: angela.whitrick@coventry.gov.uk)

13. **Any other items of private business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Julie Newman, Chief Legal Officer, Council House, Coventry
Monday, 3 July 2023

Note: The person to contact about the agenda and documents for this meeting is Suzanne Bennett Email: michelle.salmon@coventry.gov.uk

Membership

Cabinet Members:
Councillors L Bigham, R Brown, K Caan, G Duggins (Chair), P Hetherton, A S Khan (Deputy Chair), J O'Boyle, K Sandhu, P Seaman, and D Welsh

Non-voting Deputy Cabinet Members:
Councillors P Akhtar, S Agboola, G Hayre, A Jobbar, G Lloyd and S Nazir

By invitation:
Councillors S Gray, P Male and G Ridley (Non-voting Opposition representatives)

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Suzanne Bennett
Email: suzanne.bennett@coventry.gov.uk

Coventry City Council
Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 13 June 2023

Present:

Cabinet Members:	Councillor G Duggins (Chair) Councillor A S Khan (Deputy Chair) Councillor L Bigham Councillor R Brown Councillor K Caan Councillor J O'Boyle Councillor P Seaman Councillor P Hetherton Councillor D Welsh
Non-Voting Deputy Cabinet Members:	Councillor S Agboola Councillor P Akhtar Councillor G Hayre Councillor A Jobbar Councillor G Lloyd Councillor S Nazir
Non-Voting Opposition Members:	Councillor S Gray Councillor P Male Councillor G Ridley
Other Non-Voting Members:	Councillor N Akhtar Councillor R Lakha Councillor C Miks Councillor C E Thomas
Employees (by Service area):	
Chief Executive	Julie Nugent (Chief Executive)
Finance	B Hastie (Chief Operating Officer (Section 151 Officer))
Law and Governance	J Newman (Chief Legal Officer), T Robinson, M Salmon
Streetscene and Regulatory Services	J Adams, D Blackburn, S Chantler, C Hickin, M McHugh, L Nagle
Others in attendance:	D Lyon, West Midlands Police
Apologies:	Councillor Sandhu

Public Business

Welcome

The Leader, Councillor G Duggins, and Members of the Cabinet welcomed Julie Nugent, the new Chief Executive, and the newly appointed Deputy Cabinet Members, Chairs of Scrutiny Boards and Chairs of Committees, to their first meeting of Cabinet.

1. **Declarations of Interest**

There were no disclosable pecuniary interests.

2. **Minutes**

The minutes of the meeting held on 11th April 2023 were agreed and signed as a true record. There were no matters arising.

3. **Renewal of City Centre Public Spaces Protection Order**

The Cabinet considered a report of the Director of Streetscene and Regulatory Services that sought approval of the renewal of the City Centre Public Spaces Protection Order.

A Public Spaces Protection Order (PSPO) was created and approved in 2017 to address a number of behaviours within the City Centre that it was felt needed controlling. The behaviours included Street Trading, Busking, Begging, amongst others.

PSPO's were only permitted to run for 3 years and at that point either expire or an application be made to renew. The City Centre PSPO was due to expire on 16th July 2023 and approval to renew the current Order for another 3 years was being sought as it was felt that the existing order had worked well in its intention to address problematic behaviours and would benefit from those conditions being retained.

The City Centre PSPO assisted in addressing problematic behaviours and simplified the response of officers from the Police and the Council in dealing with various anti-social activities. It was quick and easy to use, which was an important consideration when both organisations were facing reductions in resources. It also had the added benefit of enabling the offender to accept a fixed penalty notice rather than appear in court and receive a criminal record. The wording of the proposed PSPO and a map of the area that would be covered by the City Centre PSPO were set out in Appendices to the report. Further Appendices detailed the Summary of Responses from Key Partners, and the Enforcement Activity for the Existing Order.

Progress on the implementation of the PSPO would be submitted to the Scrutiny Co-ordination Committee in due course.

Members requested that Parking Services be formally made aware that Cabinet had asked that they have more of a presence in the Burges area of the City Centre, to address illegal and inconsiderate parking.

RESOLVED that the Cabinet:

1) **Approves the renewal of the current City Centre Public Space Protection Order, including the area covered by the Order as set out in Appendices 1 and 2 to the report.**

2) **Authorises officers to bring the Order into effect on 14th July 2023, prior to the expiry date of the previous Order.**

4. **Review of Houses in Multiple Occupation (HMO) Additional Licensing Scheme 2023**

The Cabinet considered a report of the Director of Streetscene and Regulatory Services that sought approval for a 12-week consultation to commence on 1st July 2023 that reviewed the current Houses in Multiple Occupation Additional Licensing Scheme in Coventry which had been introduced in May 2020, and to consider the results of that consultation together with findings from the review in a future report.

The duty to licence Houses in Multiple Occupation (HMOs) was introduced in July 2006 through powers provided under the Housing Act 2004 (the Act), at that time HMOs that were three or more storeys in height and occupied by five or more persons required a licence through the HMO mandatory licensing powers.

In October 2018 the definition for HMOs requiring a mandatory HMO licence was changed to include any HMO occupied by five or more people forming two or more households, in effect removing the three-storey requirement.

Additional licensing of HMOs was a discretionary power that, if introduced by Local Authorities, could be applied to those HMOs which were not required to be licensed under the mandatory licensing powers.

The provision of good quality housing for Coventry residents was a priority for the City Council and Additional Licensing of HMOs was first introduced in the city on 4th May 2020. The Scheme could only run for a period of five years, during which time the Council must carry out a review. The Additional Licensing scheme meant that all HMOs, including those properties converted into self-contained flats without building regulations approval (Section 257 HMOs) required a licence.

The Council must complete a review within the lifetime of the Licensing Scheme. The scheme was introduced in May 2020, so this was an opportune time to review the Scheme as a sufficient amount of time had passed to measure the effectiveness of the Scheme. An Appendix to the report provided the Consultation Plan setting out the stages involved and the proposed reporting of the results of the review. An Equality and Consultation Analysis was attached as a further Appendix to the report.

RESOLVED that the Cabinet:

1) **Authorises the implementation of a 12-week consultation on the review of the Houses in Multiple Occupation Additional Licensing Scheme in Coventry.**

2) Requests that a future report be submitted to Cabinet which provides information on the achievements made during the Scheme so far following the conclusion of the review, for a decision to be made regarding the future of the Houses in Multiple Occupation Additional Licensing Scheme in Coventry.

5. **Outstanding Issues**

There were no outstanding issues.

6. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

There were no other items of public business.

Craig Hickin

The Leader, Councillor Duggins, referred to the impending retirement of Craig Hicken after 31 years of service to the Council and, on behalf of the Cabinet, thanked Craig for his hard work and dedication to the Authority in his role as Head of Environmental Services and wished him well for the future.

(Meeting closed at 2.40 pm)

Coventry City Council

Public report
Cabinet Report

Cabinet Meeting 11 July 2023

Name of Cabinet Member:
Cabinet Member for Jobs, Regeneration and Climate Change – Councillor J O'Boyle

Director Approving Submission of the report:
Director of Transportation and Highways

Ward(s) affected:
St Michaels

Title:
Palmer Lane Regeneration 2023 Update

Is this a key decision?

Yes – the total budget for the delivery of the Palmer Lane Regeneration scheme will be in excess of £1 million pounds

Executive Summary:

Since 2019 the Council has transformed the city centre through a £44m programme of investment in the public realm. The impact of this work has been significant, attracting developers to invest in the city and creating a legacy for residents and those living and working in the city.

Palmer Lane is a proposed regeneration scheme that includes deculverting the River Sherbourne and hard and soft landscaping around the area to create a new city centre place for dwell time and supporting the establishment of a new business in the Illingworth building.

The scheme was first approved by Cabinet as part of the Public Realm Phase 5 report in March 2018, as a complement to the Public Realm 5 (PR5) works taking place in the city centre and to develop designs for the proposal. During 2021 there was an additional need identified for a further £950k to fund the overall regeneration of Palmer Lane as well as approve the external funding contributions towards the project. This was given approval in a Cabinet Member report in July 2021.

The Palmer Lane project has continued to detailed design level throughout the year of 2021 and 2022 to a point where final designs are in place and legal land agreements are concluded.

Following early contractor engagement with a framework construction company the project will need further funding in order to deliver the overall Palmer Lane scheme. This increase in cost is a consequence of high inflation over the last 12 months and increases in labour and material costs that we have seen during 2022/2023. This report therefore also seeks approval for an additional ask of £318k to be funded from corporate reserves.

This report also seeks to report to Cabinet a grant acceptance from Historic Coventry Trust (HCT) of £534k which took place in March 2023, this was an increase of £155k from the previous approved HCT contribution of £379k. Due to the urgency required to accept the grant funding, this was accepted under delegated powers in accordance with the provisions of the Council Constitution.

Recommendations:

The Cabinet is recommended to:

(1) Approve the additional funding of £318k for the delivery of the Palmer Lane project taking the total budget for the delivery of the scheme to £2.4m. The additional funding will be added to the 5-year capital programme.

(2) Note the grant acceptance of £534k received from Historic Coventry Trust in March 2023 under delegated authority contained in paragraph 2.3.2 (c) of Part 3F (Financial Procedure Rules) of the Council Constitution.

(3) Note the delegated authority provided to the Director of Transportation and Highways following consultation (by way of the Cabinet Member report dated 15th July 2021) to conclude negotiations and enter into legal agreements with the various landowners for parcels of land to be acquired or leased by the Council and/or for licences to be entered into to enable works to be carried out and for agreements to be entered into and/or for leases to be granted by the Council to third parties over land in the Council's ownership in order for the scheme to be viable and to Authorise any variations related to such legal agreements.

(4) Note the continued exercise of the delegated authority provided (by way of the Cabinet Member report dated 15th July 2021) to commence the procurement in order to appoint a works contractor through an approved procurement framework.

(5) Note the delegated authority provided (by way of the Cabinet Member report dated 15th July 2021) to the Director of Transportation and Highways, following consultation with the Chief Legal Officer, to approve grant expenditure to any such external body, third party or person as is deemed necessary for the delivery of the Palmer Lane project up to an individual maximum sum of £250,000.

List of Appendices included:

Appendix 1 - Designs for Palmer Lane

Background papers:

None

Other useful documents

March 2018 Public Realm 5 Report - Cabinet 6th March 2018 and Council 13th March 2018
Palmer Lane Regeneration Report – Cabinet Member for Jobs, Regeneration and Climate Change 27th July 2021

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title: Palmer Lane Regeneration 2023 Update

1. Context (or background)

1.1 A series of transformational public realm improvements have been delivered as part of the Public Realm Phase 5 programme. The schemes have delivered enhancements to key strategic parts of the city and also enhanced the setting of the key events venues and visitor attractions. As part of the PR5 Cabinet Report March 2018, Palmer Lane was identified as a key project to develop in line with a funding contribution towards a Heritage Lottery Funded scheme to de-culvert the River Sherbourne in Palmer Lane, as part of the wider improvements to the Burges area.

1.2 The Palmer Lane regeneration aims to create a new city centre visitor destination by opening up the Sherbourne, supporting the repurposing of the Illingworth building and creating a new public space to enable people to spend time by the river. The project will include extensive landscaping, enhanced lighting and sustainability improvements to the area. It ties in with the works which have recently taken place on the Burges. Final designs can be seen in the appendix.

1.3 The March 2018 Cabinet report also gave delegated authority to the then Deputy Chief Executive (Place) following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change and the Director of Finance and Corporate Services to agree the detailed works

1.4 The Palmer Lane design has developed throughout 2022 and we now have detailed construction designs which have allowed for more accurate pricing from a contractor. These costs mean the overall project cost has increased to £2.402m primarily as a result of high inflation.

1.5 The corporate funding agreed to date is £950k (approved in July 2021). A number of external contributions have been agreed totalling £979k making the total funding agreed to date £1.929m. This leaves a funding gap of £473,000.

1.6 Historic Coventry Trust have agreed to increase their contribution to £534k (from £379k) and this report asks cabinet to note the increased grant acceptance which took place in March 2023.

1.7 The net shortfall is therefore £318k. If this cannot be found the HCT contribution, along with contributions from ST and EA would need to be returned and would be lost to the project. To avoid losing this funding, and to enable this project which offers a unique opportunity to create a unique space in the city centre to go ahead, approval for a further allocation of £318k from corporate resources is being sought.

2. Options considered and recommended proposal

2.1 Option 1 – Agree to fund a further £318k of the Council's own corporate capital receipts and continue with the delivery of the scheme building upon the shovel ready design in place and capitalising on the match funding opportunity. Note the use of emergency powers to accept HCT contribution of £534K in March 2023.

2.2 Option 2 – Leave the project design 'on the shelf' and seek future external funding, meaning the Council misses the opportunity of match funding arising from the Historic Coventry Trust regeneration of the Burges and would need to return £534k to Historic England,

2.3 It is recommended that the Council proceeds with Option 1.

3. Results of consultation undertaken

3.1 The project team have engaged with Historic Coventry Trust (HCT) and affected businesses and landowners in order to gauge the appetite for regeneration of the space. This has been successful and there is support for repurposing the space, opening-up the river and driving-out anti-social behaviours.

4. Timetable for implementing this decision

4.1 Following a decision by the Cabinet the project team are able to proceed quickly to appoint a contractor using a current procurement framework and proceed with works during Summer 2023.

5. Comments from Interim Chief Executive (Section 151 Officer) and Chief Legal Officer

5.1 Financial implications

Existing budgets and contributions for the programme are:

Funding:	Amount
Growth Fund	£ 50,000
HCT: Grant Agreement	£ 534,000
S106	£ 130,000
S111	£ 75,000
Corporate Funding - CCC	£ 950,000
Suds	£ 150,000
Environment Agency	£ 95,000
STW	£ 100,000
Corporate Funding Ask - CCC	**£ 318,686**
	£ 2,402,686

5.2 The report seeks approval to progress with the scheme, allocating a further £318k from corporate capital receipts to bridge the funding gap.

5.3 The Palmer Lane de-culverting project was previously approved by Cabinet in March 2018, forming part of the draft scheme list approved by Cabinet for the PR5 project. Subsequently Palmer Lane had a further £950k approved in July 2021.

5.4 Any further pressures will be managed within the project budget by de-scoping or identifying scheme efficiencies where able.

6. Legal implications

6.1 The Council has the power to enter into the arrangements within this report pursuant to its power contained within section 1 of the Localism Act 2011 (“General Power of Competence”)

6.2 All services and works contracts required for the delivery of the project, will be entered into following the conclusion of a compliant procurement processes in accordance with the

Public Contract Regulations 2015 (where applicable), the Council's constitution and the Council's Rules for Contracts.

6.3 All grant agreements necessary to deliver this project will need to be compliant with the Subsidy Control Regulations (to prevent distortion to the market) and the Council's constitution.

6.4 All land transactions (leases/ licences/ transfers and other ancillary agreements) have been entered into in compliance with the Council's constitution and the Council's fiduciary duty to achieve best value.

7. Other Implications

None

8. How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

8.1 The Palmer Lane project will indirectly or directly provide jobs across the city and sub-region. The Economic Growth and Property Strategy specifically acknowledges the importance of infrastructure to help create growth and connect people to jobs.

8.2 The schemes also support the City Centre Area Action Plan and Local Plan, which identifies the importance of public realm and these key areas for development.

8.3 The project will support sustainability outcomes and deliver a greener space in the heart of the city centre

9. How is risk being managed?

The legal agreements entered into provide the Council with access to the necessary land required for the project to proceed.

There is a robust governance structure in place for the public realm programme whereby risks are managed by project team level and reported to project board. Regular risk workshops are undertaken on all projects to ensure active monitoring and management.

The maximum budget available for the scheme is as stated in the report. Although the design of the scheme is considered deliverable within this, there is a risk that prices tendered could exceed the budget available, this risk will be minimised by agreeing a target cost before works start and close financial management of design and budgets.

10. What is the impact on the organisation?

None

11. Equality Impact Assessment (EIA)

The Palmer Lane project will undertake an Equality Impact Assessment as part of project development and impact. The public realm proposals will make movement around the city centre easier for everyone. Discussions with the Access Groups and representative organisations will continue through scheme development, to ensure that the design of all schemes to be developed properly reflects access needs. The EIA document is currently being developed by the project team.

12. Implications for (or impact on) climate change and the environment

The project will have a positive impact on the environment in the city centre. More green spaces will be introduced into the city centre. The Palmer Lane de-culverting scheme will create an open water-course in the city centre, water-courses in urban locations have been linked to public health benefits and opening up the river will offer a new dwell space in the heart of the city.

12. Implications for partner organisations?

The Council will need to work with the Environment Agency as part of the Palmer Lane de-culverting work and the project will be delivered in partnership with Historic Coventry Trust and the CCC Ecology team.

Report author:

Name and job title:
Jo Shore
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Transport and Highways

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Enquiries should be directed to the above person.

Contributor/approver name	Title	Service Area	Date doc sent out	Date response received or approved
Contributors:				
Sunny Heer	Lead Accountant	Finance	03/05/2023	04/05/2023
John Redfern	Corporate and Commercial Lawyer	Law and Governance	26/05/2023	06/06/2023
Michelle Salmon	Governance Services Officer	Law and Governance	10/05/2023	11/05/2023
Names of approvers for submission: (officers and members)				
Tina Pinks	Lead Accountant, Finance Manager	Finance	09/05/2023	10/05/2023
Oluremi Aremu	Head of Legal and Procurement Services	Law and Governance	28/04/2023	02/05/2023
Colin Knight	Director of Transportation and Highways	-	09/05/2023	10/05/2023
Councillor J O'Boyle	Cabinet Member for Jobs, Regeneration and Climate Change	-	19/06/2023	19/06/2023

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Coventry City Council

Public report
Cabinet

Cabinet

11 July 2023

Name of Cabinet Member:
Cabinet Member for Jobs, Regeneration and Climate Change - Councillor J O'Boyle

Director approving submission of the report:
Director of Business, Investment and Culture

Ward(s) affected:
All

Title:

Reorganisation of Coventry and Warwickshire Growth Hub

Is this a key decision?
No

Executive summary:

Coventry and Warwickshire Growth Hub (CWGH) was established in 2014 using City Deal funding provided by Government. It was one of the first Growth Hubs to be formed in England, before every Local Enterprise Partnership (LEP) area was subsequently given funding to establish a Growth Hub as a central co-ordination point for publicly funded business support to try and simplify businesses' understanding of which business support products were appropriate to their individual needs. It has been nationally recognised as a leading Growth Hub in the UK.

CWGH was established as a subsidiary of Coventry and Warwickshire Local Enterprise Partnership (CWLEP), which itself is a company limited by guarantee. Coventry City Council (CCC) has a seat on the CWGH Subsidiary Board, along with Warwickshire County Council (WCC). The CWGH has been funded by the Department for Business & Trade, European Regional Development Fund, and equal contributions from Coventry & Warwickshire's Local Authorities since its inception

Given the strategic importance of the CWGH in delivering business support in Coventry & Warwickshire, its success to date and its collaboration with all the Coventry & Warwickshire Local Authorities, it has been agreed by the CWLEP board to transition residual funds from the closure of CWLEP to the CWGH, enabling the Growth Hub to continue as a stand-alone entity as a going concern.

Under this arrangement, and building on legal advice, it is proposed that Coventry City Council and Warwickshire County Council become the joint shareholders of the new company to also ensure the democratic accountability required. It is proposed that CWGH is governed by a Board consisting of both public and private sector representatives, with CCC having a representative on the Board.

CCC has also made provision in its budgets to continue to support the CWGH at the current level of £130,560 under the current Medium Term Financial Strategy (MTFS). Subject to formal approvals, WCC is planning to fund CWGH to the same level this financial year and committed to continuing to provide funding for this purpose, with CWGH's remaining funding being derived from other Local Authority sources, external funding, and commercial income.

This report requests Cabinet to approve the reorganisation of CWGH and Coventry City Council's role as Joint Shareholder and participant on the new CWGH Board. WCC will be taking a similar report and recommendations to their Cabinet meeting on 13th July 2023.

Recommendations:

Cabinet is requested to: -

1) Approve the use of its powers under Section 12 of Local Government Act 2003 and Section 1 of the Localism Act 2011 to become a shareholder in the Growth Hub. This is subject to the transfer of CWLEP residual funds of circa £0.9m to the Growth Hub.

2) Delegate authority to the Head of Economic Development, following consultation with the Chief Operating Officer (Section 151 Officer) and Chief Legal Officer and the Cabinet Member for Jobs, Regeneration and Climate Change, to enter into the relevant legal agreements as well as any associated documents deemed necessary to complete the transaction.

3) Approve the implementation of the governance structure and utilise the existing Shareholder Committee terms of reference as per the constitution.

4) Delegate authority to the Head of Economic Development, following consultation with the Chief Operating Officer (Section 151 Officer) and Chief Legal Officer and the Cabinet Member for Jobs, Regeneration and Climate Change to approve the issue by CWGH of one share to WCC on the same terms as CCC to become joint shareholders.

5) Delegate Authority to appoint CCC's representative for the new CWGH Board on behalf of the Coventry City Council to the Chief Operating (Section 151 Officer) and Chief Legal Officer following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change.

List of Appendices included:
None

Background papers:
None

Other useful documents:
None

Has it or will it be considered by Scrutiny?
No

Has it or will it be considered by any other Council Committee, Advisory Panel or other body?
No

Will this report go to Council?
No

Report title: Reorganisation of Coventry and Warwickshire Growth Hub

1. Context (or background)

1.1. Coventry and Warwickshire Growth Hub (CWGH) was established in 2014 using City Deal funding provided by Government. Every Local Enterprise Partnership (LEP) area was given funding to establish a Growth Hub as "one stop shop" for business support. At any one time, there are hundreds of different business support products available, and the Growth Hub's role has been to simplify things for local businesses providing a single point of contact to access whichever support was most relevant to that business at the time.

1.2. CWGH was established as subsidiary of Coventry and Warwickshire Local Enterprise Partnership (CWLEP), which itself is a company limited by guarantee. Coventry City Council (CCC) has a seat on the CWGH Subsidiary Board, along with Warwickshire County Council (WCC). CWLEP ceased its activities on 31st March 2023; a reduced CWLEP Board remains in place in order to approve the transfer of shares in CWGH and complete the reorganisation outlined in this paper.

1.3. CWGH has been funded using a mix of core funding from Local Authorities, funding from the Department for Business and Trade and other grants such as from the European Regional Development Fund. Its current projected annual operating budget is £726,454, of which CCC's contribution is £130,560. CCC has made budgetary provision to continue to support the CWGH at this level. WCC is funding CWGH to the same level this financial year and is committed to continuing to provide funding for this purpose subject to formal approval.

1.4. It should be noted that the recommendation is for CCC and WCC to take on the shareholding for CWGH, and its two subsidiaries, CW Growth Hub Solutions Ltd (CWGHS) and CW Champions. CWGHS currently delivers a grant-funded manufacturing advice programme called Made Smarter, and also generates commercial income from recruitment services etc. CW Champions is a local professional network which generates income on a membership model.

1.5. These subsidiaries generate their own income in order to cover costs, and in the event that they are unable to generate sufficient income, their activities will not continue. Reserves are available to cover the closure costs of all activities, including the subsidiaries, reducing any financial risk associated with such a situation.

1.6. In early 2022, Government concluded a review of LEPs and the functions they carry out on behalf of local areas, with the outcome set out in the Levelling Up White Paper (February 2022) and a letter to LEP Chairs (31st March 2022). The conclusion was that LEP functions, including Growth Hubs, made critical contributions to local economies. However, the review concluded that these functions should be "integrated" into democratically accountable institutions in areas which had a devolution deal in place. These institutions are identified as being combined authorities, county councils and unitary authorities, this includes CCC, which is a member of the West Midlands Combined Authority (WMCA), whereas WCC is currently a non-constituent member of the WMCA and is not covered by its devolved powers.

1.7. In other areas without devolution deals, the review called for LEPs to continue to operate until a suitable approach to devolution of powers from Government to local areas could be agreed, such as a "County Deal".

1.8. As CWLEP covered areas with and without a devolution deal, CWLEP's functions cannot be simply transferred from CWLEP to WMCA. Instead, a bespoke approach has been agreed which will maintain a strong voice for Coventry and Warwickshire.

1.9. In September 2022, the CWLEP board approved a paper responding to the LEP review, which set out plans to close the CWLEP parent company, and restructure CWGH as a standalone entity, that will continue to act as the main central co-ordination point for publicly funded business support across Coventry and Warwickshire. In order to provide the democratic accountability called for in the review, Coventry City Council and Warwickshire County Council would need to become the shareholders of the new company. In doing so the CWLEP residual funds of circa £0.9m would be transferred to the Growth Hub.

2. Options considered and recommended proposal

2.1. It would be possible to wind up the activities of CWGH now that CWLEP itself has ceased its activities. However, this option has been discounted for a number of reasons. CWGH has been an important part of the Coventry and Warwickshire business support partnership since 2014 and has a considerable reach into local businesses. If CWGH was to close this route for businesses to access support would be lost, and this would also mean that the area would lose access to any funding for Growth Hub activities made available by central government. It would not be in line with the conclusions of Government's LEP review which sets out to maintain Growth Hubs. Therefore, this option will not be pursued.

2.2. Maintaining the current structure, with CWGH as a subsidiary of CWLEP is not an option, because the parent company ceased its activities at the end of March 2023 and only maintains a reduced board to oversee the transfer of CWGH. CWLEP currently owns the shareholding in CWGH, therefore any course of action must involve a change to the legal structure of CWGH if it is to continue operating.

2.3. Another potential approach would be to allow the activities of CWGH to be absorbed into a larger, regional function operated by the WMCA. Whilst this would achieve some of Government's objectives set out in the LEP review by passing responsibility for this function to WMCA, it would not be acceptable in Coventry and Warwickshire; because Warwickshire sits outside the WMCA area, and this approach would likely require the establishment of a separate Warwickshire Growth Hub, splitting up the established Coventry and Warwickshire business support landscape and introducing inefficiencies. This option is therefore not recommended.

2.4. The recommended option is for CCC and WCC to acquire the shareholding in CWGH which will maintain its current role serving Coventry and Warwickshire businesses. This will achieve the aims of the LEP review and give Coventry City Council and Warwickshire County Council the appropriate oversight of CWGH's activities through a new shareholding and board structure set out below.

2.5. The existing company limited by shares will continue to operate with a new shareholding, which will avoid the need for transferring staff, novating contracts, and opening new bank accounts etc.

2.6. It is proposed that CCC and WCC will be the equal shareholders of CWGH. This will be achieved as follows:

- CWLEP's existing single share in CWGH will be transferred to CCC
- CCC will allot an additional share to WCC.

2.7. This will leave the two Councils as joint (50/50) shareholders of the CWGH.

2.8. A Shareholders agreement will be put in place, which will set out the structure of a new board for CWGH. CCC and WCC will each have the right to appoint a Director. The shareholders

agreement will also require CWGH to submit a business plan to CCC and WCC for approval every year.

2.9. As shareholders, CCC and WCC would have the ability to amend the company's articles, including those dealing with board representation.

3. Results of consultation undertaken

3.1. The continuation of Coventry & Warwickshire Growth Hub will play a vital role in delivering the One Coventry Plan's objective of "Increasing the Economic Prosperity of the City and Region". The development of this Plan has been subject to extensive consultation of both Council staff and external stakeholders, with some 485 people completing surveys and 433 individuals attending 23 workshops up to September 2022. This consultation process determined that a key objective needs to be to support local businesses to innovate, grow and scale up, and create new jobs. As the central co-ordination point for publicly funded business support across Coventry & Warwickshire since 2014, the Growth Hub has played a crucial role in ensuring the highest possible number of businesses are engaging with local business support services and are accessing the support services that are most appropriate to their needs.

3.2. The consultation process of the Coventry Economic Development Strategy 2022-2027 (one of the foremost strategies for delivering the One Coventry Plan) featured input from over 100 stakeholders both internal and external to the Authority between October 2021 and July 2022, including local business support bodies and universities. Again, through this process, it was agreed that a key objective needs to be to provide a first-class business support ecosystem that is responsive to the needs and opportunities faced by the city's 10,200 businesses, the majority of which are micro, small or medium sized firms. Having a strong Growth Hub, working closely with the other public and private bodies delivering business support in Coventry & Warwickshire, will play a crucial role in supporting more local businesses to expand their markets and raise awareness of new supply opportunities.

4. Timetable for implementing this decision

4.1. The new ownership structure for CWGH will be established as soon as possible to allow the current CWLEP company, limited by guarantee to be dissolved once the shareholding has transferred. Due diligence will continue to ensure costs and risks to shareholders are acceptable following which the proposed delegated authorities would be exercised

5. Comments from Chief Operating Officer (Section 151 Officer) and Chief Legal Officer

5.1. Financial Implications

5.1.1. CCC and WCC have carried out due diligence checks to determine what historic, and forward-looking information is available to inform an assessment of financial risk and sustainability of the CWGH. This has confirmed that for year-1 (2023/24) of trading there is sufficient income to cover expected costs. For year 2 and part of year 3, without further income there are sufficient reserves to fund the balance of the Financial Business Plan although further income is expected.

5.1.2. Alongside this, the Company is limited by shares which restricts the risk level to the authorities, particularly because CWGH has established a Reserves Policy in its business plan. The policy states that the closure costs, including redundancy payments etc of all CWGH business units, including the two subsidiaries CW Growth Hub Business Solutions and CW Champions will be regularly reviewed and updated. The overall reserve position for CWGH will be maintained at a level that will allow the closure costs to be met from reserves. CWGH will be required to provide

quarterly management accounts to CCC and WCC which will allow the two LAs to monitor the cash flow and reserves position.

5.1.3. The transfer of the c.£0.9m reserve from CWLEP to CWGH is therefore essential to making the financial risk acceptable to CCC and WCC.

5.1.4. Each year CWGH will be required to agree a business plan with its two LA shareholders. In the case of CCC, this will be reviewed by the existing members Shareholder Committee as set out in the legal implications section below.

5.1.5. The Growth Hub 3-year financial business plan is shown in the table below.

Growth Hub Financial Planning

	Year 1 2023/24 £		Year 2 2024/25 £	Year 3 2025/26 £
Expenditure				
Staffing	636,454		661,912	688,389
Running Costs	90,000		93,600	97,344
	726,454		755,512	785,733
Income				
Local Authority Contributions (WCC&CCC)	261,120		261,120	261,120
Other Local Authority	105,000		80,000	80,000
Commercial Income	100,000		140,000	100,000
BEIS Grant Funding	271,000		271,000	271,000
	737,120	*	752,120	712,120
Forecast (Surplus)/Deficit)	**-10,666**		**3,392**	**73,613**

* Secured

Memorandum (Reserves)	**2023/24 £**	**2024/25 £**	**2025/26 £**
Opening Balance	-892,183	-902,849	-899,457
In year (Surplus)/Deficit	-10,666	3,392	73,613
Closing Balance	-902,849	-899,457	-540,858
Estimated Ringfenced Exit Costs			284,986
Estimated Reserve Closing Balance			-255,872

5.2. **Legal Implications**

5.2.1. CCC will become a shareholder by virtue of Part 1 Localism Act 2011 (general power of competence) but on the basis that the company will be undertaking activities that are not principally for a commercial purpose.

5.2.2. The Council is working with Anthony Collins, its external solicitors. Legal services have undertaken due diligence with the benefit of various legal advice received.

5.2.3. *Governance and Constitution* - in addition to the new Articles, CCC will enter into a shareholders' agreement with WCC which will govern how decisions are made about the Growth Hub. The shareholders agreement will have reserved matters for approval by both shareholders that are consistent with the Terms of Reference set out in the Constitution for Shareholders Committee. CCC's Shareholder Committee will form part of the governance for CWGH going forward which deals with how decisions are made for the Council's wholly owned and joint venture companies.

5.2.4. As soon as the LEP's share is transferred to CCC resolutions will be passed by the company including the issue of one share to WCC and the adoption of the Shareholders' Agreement.

Subsidy Control - with the Subsidy Control Act (the "SCA") fully in force since the beginning of 2023, the UK's subsidy control regime now captures financial assistance which has, or is capable of, having an effect on "competition or investment within the United Kingdom".

5.2.5. Overall, any funding should be a lawful subsidy in the hands of CWGH as it should be capable of complying with the relevant principles under the SCA. A detailed analysis is being undertaken to establish this with legal services. Any subsidy will have to be notified to the Department for Business and Trade within 3 months should the funding be regarded as a Subsidy. The threshold for reporting is £100,000.00.

6. Other implications

6.1. **How will this contribute to the One Coventry Plan?**

6.1.1. Having a strong and reorganised Growth Hub that can effectively engage, support and appropriately refer a significant number of Coventry & Warwickshire businesses, will make a very important contribution to the achievement of the Council's core aims. It will be fundamental to delivering the One Coventry Plan's objective of Improving the Economic Prosperity of the City and Region by helping businesses to grow, take on new staff, expand into new premises and also improving Coventry as a place to invest.

6.1.2. Given that a high number of businesses supported are required to be operating in "clean growth" sectors, or applying clean technologies, we expect that the reorganised Hub will help to "Tackle the Causes and Consequences of Climate Change". The Growth Hub will also help to "Improve Outcomes and Tackle Inequalities in our Communities" through enabling Coventry residents to benefit from good quality employment and training opportunities. They should also improve the possibility of local businesses (particularly small and medium sized firms) benefiting from new supply opportunities, which will help to improve the standard of living of Coventry's residents and tackle longstanding inequalities.

6.2. **How is risk being managed?**

6.2.1. Coventry City Council has a long track record of managing business support services and programmes, and the risks associated with this area of work are well understood. There are

risks common to most types of business support activities, such as failure to deliver business engagement and output/outcome targets and failure to comply with rules of external funders, which can carry clawback penalties. All risks will therefore be monitored on an ongoing basis through the new CWGH Board, on which CCC will be represented, and through the Shareholders Agreement, for which CCC will have a 50% stake. A robust Risk Register will be developed and maintained for the reorganised Growth Hub operation to ensure that key emerging risks are mitigated at the earliest possible stage. Monitoring the requirement for CWGH to maintain enough reserves in order to cover the closure costs of CWGH and its subsidiaries should that be necessary by reviewing management accounts etc. will be an important risk mitigation for both LAs.

6.3. **What is the impact on the organisation?**

6.3.1. Although there will not be any Council staff employed directly through the CWGH, we expect that CCC's work with the reorganised CWGH will still require significant officer time. This will include time attending Board meetings, meetings as part of the Shareholders' Agreement, other work and meetings required to monitor the CWGH finances and performance in terms of business engagement and outputs, and officers from the Economic Development Service attending meetings with CWGH, where businesses are being cross-referred to CCC's business support and finance programmes.

6.4. **Equalities / EIA?**

6.4.1. Given that the Council will be a key funder of the reorganised Growth Hub's activities, we will require CWGH to undertake a detailed Equality Impact Assessment (EIA). The Assessment will need to consider the impact of the Hub's activities on all types of local communities, and how it will address barriers to accessing business support (for example whether people from different ethnic groups are less likely to benefit from the support we provide or whether some areas of the city are more difficult for projects to reach). Equalities impact work has also been completed for the Coventry Economic Development Strategy, which references the need to create a first-class business support ecosystem and will inform the approach to this work

6.4.2. In addition, the appointment to the various roles detailed in the report (notably the CWGH Board) will be undertaken in line with Section 149 of the Equality Act 2010, known as the Public Sector Equality Duty, which requires the Council to have due regards to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between people.

6.5. **Implications for (or impact on) climate change and the environment?**

6.5.1. As stated above, we expect the reorganised CWGH to deliver positive impacts on climate change and the environment and will contribute to achieving the One Coventry Plan's objective of "Tackling the Causes and Consequences of Climate Change". We also expect the work that CWGH will do in supporting businesses to positively position Coventry as a leader in the Green Industrial Revolution, particularly through supporting the growth of "green" sectors of the economy (e.g., low emission vehicles) and securing more investment into these sectors, which will ultimately create new good quality "green" jobs and training opportunities. We also expect that the Hub will refer small and medium sized businesses to specialist support activities to better understand the causes of climate change and be able to tackle these (including through improved energy efficiency and adoption of renewable energy).

6.6. **Implications for partner organisations?**

6.6.1. CWGH is already a key partner of CCC, in that it has acted as a central co-ordination point for publicly funded business support since 2014 and has played an important role in referring businesses to CCC's business support programmes, which has been an important enabler in ensuring our programmes have realised strong benefits for businesses and the local economy, particularly from the standpoint of growing small and medium sized firms and creating and safeguarding jobs. As such, having a strong reorganised CWGH will not only deliver a positive impact for CCC's Economic Development activities, but it will also have a strong impact on other local business support partners, such as Coventry & Warwickshire Chamber of Commerce, the Federation of Small Businesses, Coventry University and the University of Warwick, by ensuring a strong pipeline of local businesses continue to be referred to these organisations to then receive high quality impactful specialist support.

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Coventry City Council

Public report
Cabinet

Cabinet 11 July 2023

Name of Cabinet Member:
Cabinet Member for Housing and Communities – Councillor D Welsh

Director approving submission of the report:
Director of Streetscene and Regulatory Services

Ward(s) affected:
All Wards

Title:

Local Plan Review Issues and Options (Regulation 18) Consultation

Is this a key decision?

Yes - the proposals are likely to have a significant impact on residents or businesses in two or more electoral wards in the City

Executive summary:

On 6th December 2022 Council resolved to adopt a new Local Development Scheme (LDS) and to undertake a full Local Plan review Approval to progress to the initial public consultation stage of the review process is now sought, this being the 'regulation 18' consultation phase, known as 'issues and options'.

The Planning Policy team alongside relevant City Council teams have assessed the existing Local Plan policies, exploring these policies through 'topic papers' to be made available at public consultation stage, each assessment is summarised within the Issues and Option Consultation Document, which is now proposed for public consultation. The Issues and Options consultation document is contained in the appendices to this report, alongside the equalities impact assessment and environmental assessment / sustainability appraisal. The Issues and options consultation seeks views across the full range of local plan policies, within these matters the authority consults upon the methodology employed to establish local housing need, suggesting that the local housing need may be established with reference to the HEDNA, without the prescribed 35% urban uplift applied.

Following the initial consultation phase, work will then commence upon the drafting of proposed revisions to planning policy, informed by the findings of the regulation 18 consultation process. Authority is therefore sought to progress to this consultation phase to continue to progress the directed Local Plan review process.

A robust evidence base will be required to support the Local Plan review to ensure that the result is a robust planning policy framework that will shape future development of the city and deliver on the priorities of the One Coventry Plan. A further report will be brought to Cabinet setting out the financial request to develop the evidence base.

Recommendations:

Cabinet is requested to:

(1) Approve the Local Plan Review Issues and Options (Regulation 18) Consultation document and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for an 8-week consultation period to begin at the earliest opportunity.

(2) Delegate authority to the Director of Streetscene and Regulatory Services, following consultation with the Cabinet Member for Housing and Communities, to make any non-substantive changes to the documents prior to consultation.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 – Issues and Options (Regulation18) consultation document
Appendix 2 - Strategic Environmental Assessment / Sustainability Appraisal
Appendix 3 – Equalities and Health Impact Assessment

Background papers:

None

Other useful documents

- Adopted Local Plan 2017
- Adopted Coventry City Area Action Plan 2017
- Report to Cabinet and Council (15th November and 6th December 2023 respectively).
- Statement of Community Involvement 2021

Has it or will it be considered by Scrutiny?

The Issues and Options consultation will be presented to Scrutiny Board during the regulation 18 consultation phase, with findings reported within representations to further inform policy review.

Has it or will it be considered by any other Council Committee, Advisory Panel, or other body?

The Local Plan Cabinet Advisory Group has been engaged prior to the issues and options consultation phase and will continue to inform emerging policy direction.

Will this report go to Council?

No

Report title: Local Plan Review Issues and Options (Regulation 18) Consultation

1. Context (or background)

1.1 Local Plans should be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework:
"Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary".

1.2 As the Local Plan was adopted in December 2017, Council approved the commencement of a full review of the Local Plan on 6th December 2022, to ensure that policies are up to date in line with changes to national policy and guidance, and that they also reflect more localised priorities. Members should note that the Coventry City Area Action Plan, was adopted alongside the Local Plan, and this will be incorporated in this review. Therefore, all references to 'The Local Plan', 'The Plan' and 'Plan Review' incorporate both documents.

1.3 Members should also be aware that, on 22nd December 2022, Government launched a consultation on forthcoming reform to the planning system. At the time of writing the outcomes of this have not been announced however the current adopted Local Development Scheme (LDS) (the Council's project timeline for Local Plan review) enables the Council to proceed within the timeline for progressing plans under the current system, minimising risk, and uncertainty.

1.4 In terms of the way in which the plan review will be undertaken, it is a full review so each policy has been considered in turn, reflecting updated evidence, to see whether it is up to date, whether it might need minor change or whether more strategic change is required i.e., significant update to a policy or the potential introduction of new policy.

1.5 Council approved a 'full review' (i.e., of all policies) and not a new Local Plan, and the approach will therefore be proportionate in order to meet the challenging timelines in the LDS.

1.6 The final revised Local Plan might be re-ordered to reflect changed priorities, however because this is a first stage the consultation document (Appendix 1 to the report) follows the same structure as the adopted Plan, to help avoid confusion so people can see where the differences may occur.

1.7 Consultation will be undertaken in line with the adopted Statement of Community Involvement to ensure that individuals, communities, stakeholders, and other organisations have ample opportunity to engage through a variety of means. The established planning policy database will directly notify those registered at the launch of the public consultation.

1.8 The key issues being considered through the review of the plan are:

- The reviewed policies will reflect the most up to date national planning policy (if they do not do so, the plan will be found unsound by a Planning Inspector)
- The review and re-establishment of local housing need and supply
- The reviewed policies will reflect the priorities of the One Coventry Plan 2022 – 2030
- The reviewed policies will reflect the priorities of the Climate Change strategy (noting that this is currently at a draft stage and may be subject to change)
- The reviewed policies will reflect the priorities of other Council strategies such as the recently adopted Transport Strategy for example, and discussions have been ongoing with a range of council departments in formulating this review – these are reflected in the suite of Topic Papers and other supporting evidence which have informed this stage of the review

- The reviewed policies will consider the outcomes of the updated evidence base

1.9 All comments received will be considered and policies updated to reflect feedback where appropriate, and if further evidence is identified as being needed this will be commissioned and obtained in order to ensure that proposals are robust and will stand up to independent scrutiny.

1.10 Once the reviewed policies (and any potential new policies) are completed, the Council will need to publish these in a 'Proposed Submission' (Regulation 19) document which will be the subject of consultation before it is submitted to the Planning Inspectorate for Examination in Public.

1.11 To address the above and inform the review of the plan a further report will be brought to Cabinet in due course, setting out the financial request to develop the evidence base. The evidence base will be critical to supporting the case presented to the planning inspectorate for an ambitious revised planning policies which will inform assessment of proposed development in the city through the plan period. At later stages of the review process, draft local planning policy will be consulted upon which aim to support Coventry's journey to net zero, tackling inequalities and improve outcomes for our communities, alongside economic prosperity of our city and region, as set out in the One Coventry Plan priorities.

2. Options considered and recommended proposal

2.1 The Cabinet could choose to not progress with the consultation, however, this would not address the need to review the Local Plan or be in accordance with the published Local Development Scheme and as such this option is not recommended.

2.2 The Cabinet could choose to instruct officers to amend the consultation documents and supporting information. However, these have been prepared to respond appropriately to council priorities and up to date evidence, and this would cause delays which may mean not achieving the plan programme in line with the published Local Development Scheme.

2.3 The Cabinet could approve the Issues and Options consultation document and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for an 8-week consultation to begin at the earliest opportunity.. This option is recommended.

3. Results of consultation undertaken

3.1 The consultation outcomes will be reported to a future meeting of Cabinet, with recommendations for the next stage of the plan review process

4. Timetable for implementing this decision

4.1. At the earliest opportunity further to decision.

5. Comments from Chief Operating Officer (Section 151 Officer) and Chief Legal Officer

5.1. Financial Implications

Whilst there are no direct financial impacts of the Regulation 18 consultation stage, ultimately the Local Plan review must be supported by robust evidence which will need to be commissioned, alongside which at later stages of the Plan Review, it is the legal responsibility

of the Council to meet the costs of the Examination inclusive of the appointment of a Programme Officer.

The anticipated evidence base and enquiry costs will be outlined in separate reports to follow.

5.2. **Legal Implications**

Local Authorities are required by legislation to prepare a Local Plan to set the local planning framework for their area. There is also a need to ensure the plan is up to date through a review of the Plan. Failure to have an up-to-date local plan in place limits the Council's ability to influence the quantum, location and quality of development in its area.

There are no direct implications as a result of this report. The process for preparing a Local Plan is contained within the Planning and Compulsory Purchase Act 2004, Localism Act 2011 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

6. Other implications

6.1. **How will this contribute to the One Coventry Plan (https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan)?**

A reviewed Local Plan will enable the corporate priorities to be reflected as they are set out in the One Coventry Plan 2022 - 2030.

6.2. **How is risk being managed?**

There is a risk that the reviewed policies could be found unsound by a Planning Inspector, however this is minimised by producing a thorough evidence base and having undertaken extensive consultation prior to submission of the plan.

6.3. **What is the impact on the organisation?**

No direct impact from having additional planning policies.

6.4. **Equalities / EIA?**

A full Equality and Impact Assessment (EqIA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010) (Appendix 3 to the report).

6.5. **Implications for (or impact on) climate change and the environment?**

The Issues and Options consultation paper has been developed in conjunction with the climate change team, who will continue to be engaged in future plan review stages.

6.6. **Implications for partner organisations?**
None

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Councillor D Welsh	Cabinet Member for Housing and Communities	-	16.06.2023	21.06.2023

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APPENDIX ONE

COVENTRY CITY COUNCIL LOCAL PLAN REVIEW

(INCORPORATES THE COVENTRY CITY AREA ACTION PLAN)

Planning Policy

ISSUES AND OPTIONS CONSULTATION DOCUMENT (Summer 2023)

Issues and Options consultation
Contents

Chapters

Chapter 1: Introduction
Chapter 2: Health and Wellbeing
Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate
Chapter 4: Jobs and Economy
Chapter 5: Housing
Chapter 6: Retail and Centres
Chapter 7: Communities
Chapter 8: Green Belt and Green Environment
Chapter 9: Design
Chapter 10: Heritage
Chapter 11: Accessibility
Chapter 12: Environmental Management, Minerals and Waste
Chapter 13: Connectivity
Chapter 14: Coventry City Area Action Plan

Appendices

1 Call for Sites Form
2 Nationally Described Space Standards
3 Infrastructure Delivery Plan update (table)
4 Glossary

Chapter 1: Introduction

The need to review the Local Plan

Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017. These documents set out how much and what kind of development is needed up until the year 2031, where it should go, and what policies should be applied in order to help the Council decide whether planning applications are acceptable or not. They are known as Development Plan Documents (DPDs) and are prepared in line with a strict legal process.

The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing or even rewriting to reflect changes to national policy or other matters.

This is what we are now doing. We are carrying out a full review which means that we are reviewing every policy to see what needs changing and why, and whether there are any new policy areas we should be introducing.

The One Coventry Plan and Climate Change

Since the Local Plan was adopted the Council has published a new corporate plan, the One Coventry Plan 2022 – 2030[1]. The vision is set out below, which the reviewed Local Plan will need to play its part in delivering.

One Coventry Vision

'One Coventry – working together to improve our city and the lives of those who live, work and study here.

We will create:

- A city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created
- A city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities
- A city that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change'

Climate Change Strategy

The draft Climate Change Strategy[2] was consulted on in spring / summer 2023, and it is intended to publish the final version by the end of 2023. This establishes a framework as to how Coventry City Council plans to work as a local authority, and through its arms-length operating companies, to meet sustainability objectives combatting waste and pollution, promoting biodiversity, focusing on the need to tackle climate change and adapt to the inevitable changes to the climate in Coventry and the UK.

[1] https://www.coventry.gov.uk/onecoventryplan
[2] https://www.coventry.gov.uk/draftclimatechangestrategy

The draft Climate Change Strategy contains the vision:

> '*To make Coventry the UK's leading Sustainable City, improving the quality of life for all*'.

The draft strategy sets out five development pathways to sustainability:

- Low emission – new economic opportunities through decarbonisation and innovation
- Nature-based – enhance the biodiversity and urban ecosystems of our green and blue infrastructure
- Circular economy – new models of production and consumption, reducing waste and increasing re-use and recycling
- Resilient – anticipate, prevent, absorb and recover from the impacts of climate change and changing weather patterns
- Equitable and people-centred – inclusive urban communities, addressing poverty and ensuring a just transition to ensure our most deprived communities are not disproportionately impacted in our efforts to tackle the causes and consequences of climate change

In terms of the Local Plan review, the draft Climate Change Strategy states that:

> 'The Plan Review process will be wide ranging and should in particular consider opportunities to:
>
> a. Further promote energy conservation in buildings and the development and use of renewables for energy generation
> b. Further protect and enhance biodiversity
> c. Promote high quality design that promotes active travel
> d. Ensure accessibility to public transport and minimise the need for the private motor vehicle
> e. Further reduce the risk of flooding and minimise the opportunities for heat gain'

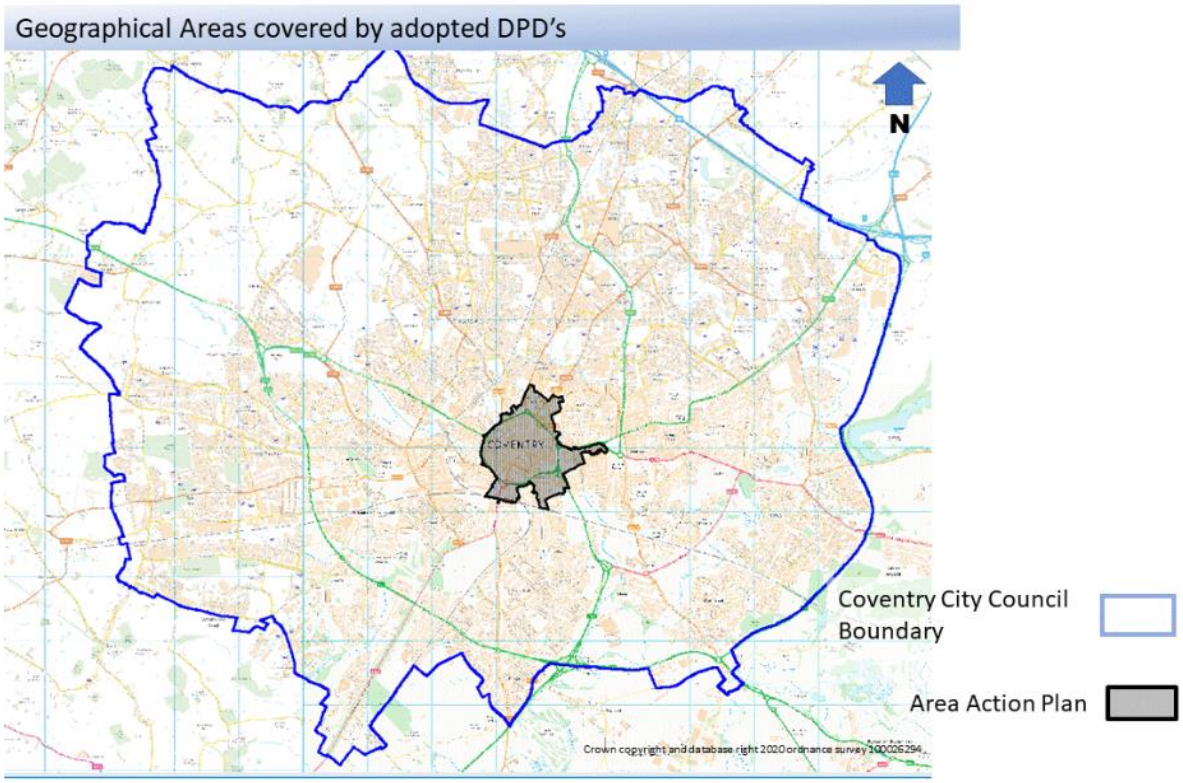
It is essential that the Local Plan is prepared in a way which delivers sustainable development and supports our journey to net zero. The National Planning Policy Framework, within Local Plans must be prepared, sets out that there are three overarching objectives:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in theright places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The plan review takes into account the above context, alongside the need to consider changes to national planning policy and guidance and other relevant policy and guidance. These are detailed in the separate chapters of the plan which address different themes.

The area covered by the Coventry Local Plan and the Coventry City Area Action Plan

The map below shows the area which each plan relates to. We are reviewing these together through this consultation document and it is our intention that a final reviewed plan will result in both plans being incorporated into a single document.



The process of the Local Plan Review

The first stage of the review is the 'Regulation 18' stage as defined in the Town and Country Planning (Local Planning) (England) regulations. This is about setting the scope of the plan and deciding what we need to address. We are calling this our 'Issues and Options' plan as we need to consider what issues have arisen since the plan was adopted, and, where relevant what options we need to consider as well as any suggestions for updating or introducing policy. We are consulting on this, and will take account of comments when we move forward to drafting the reviewed plan.

Once we have made any changes we will consult again through a formal process required by law ('Regulation 19') before submitting the proposed plan to the Secretary of State for Levelling Up, Housing and Communities who will appoint an independent Planning Inspector to examine the plan and decide if it is sound and can therefore be adopted by the Council.

Any changes to our planning policies, including developing new policy, must be supported by robust evidence and we will publish this when we consult so you can see our reasoning, as well as making clear where we think we may need further evidence. We also need to ensure our policies are sustainable, have regard to environmental and health matters and consider impacts upon our communities. We therefore also prepare a Sustainability Appraisal and an Equality and Health Impact Assessment and these are also available for comment when we consult as these help us to shape our policies.

It is important to note that **this is not a NEW Local Plan**. It is important that the review is proportionate and focuses upon areas which need updating, in particular any strategic areas of change as these will have the most impact.

How this Issues and Options consultation document works

The starting point is the adopted 2017 Local Plan and City Centre Area Action Plan, as the task is to review these adopted documents to see what is up to date, what needs updating, and whether any new policies are required.

To keep the process of the review as simple as possible, this document follows the topic order of the adopted Local Plan and Area Action Plan as it will be easier to follow. The policies may well be re-ordered in the final version to reflect changed priorities.

For the Local Plan we have summarised each current policy for ease of reference, and then explained where we think it needs changing and why, and where we may need to introduce new policy. **We have not replicated each existing policy in full, as this would be too unwieldy, however the existing adopted Local Plan and Area Action Plan and accompanying policies map** can be seen on our website https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031

We have provided the references to the evidence we have used in reviewing our policies so you can read further detail if you so wish, and we have produced a series of topic papers to help steer the debate .

For the Area Action Plan (AAP) review, the adopted plan contains a series of localised policies relating to the city centre, so in Chapter 14 we consider these, and we are asking for your comments as to the future of the AAP.

We are providing opportunities to comment throughout this document so that we can clearly see what people think about our suggestions and so that we can make any changes necessary.

Chapter 2: Health and Wellbeing

Preamble - the City's priorities for healthy and safe communities and addressing climate change

Planning is essential to people's health. The way places are planned, designed, built, and managed has a significant influence over how communities can live healthy and fulfilling lives. Research shows that 60% of people's health status is determined by their socio-economic and physical environment, while the healthcare system and individual genetics account for 25% and 15%, respectively.

The One Coventry Plan seeks to reduce the differences in health inequalities and health outcomes that exist in the city and improve wellbeing and life changes for residents. The average life expectancy at birth in Coventry for 2017-19 was 82.2 years for females and 78.7 years for males, both of which were notably lower than the England average; not to mention the wide gap which means someone living in amongst the city's more deprived neighbourhoods die on average 10 years younger than a person living in amongst the city's least deprived neighbourhoods.

While Coventry is a relatively young city compared to the national average, there is an increasingly ageing population, which brings with it related health issues, such as over the Local Plan period there will be a 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems.

Town planning can contribute so much to the health of our population, and Coventry as a 'Marmot City'[3] is dedicated to this. Coventry has been a Marmot City since 2013, and this Local Plan builds on this status. This means Coventry City Council is dedicated to improving public health and tackling the health inequalities that exist across the city, through the Marmot Principles. Health inequalities refer to the difference in health experienced from the poorest in society through to the richest. These differences are preventable, and urban planning has an important role in tackling them. Coventry City Council aims to reduce health inequalities by embedding the following Marmot Principles:

1. Give every child the best start in life
2. Enable all children, young people, and adults to maximise their capabilities and have control over their lives
3. Ensure healthy standard of living for all
4. Create fair employment and good work for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination, and their outcomes
8. Pursue environmental sustainability & health equity

The Local Plan review will seek to further align with this corporate strategy by strengthening the Marmot City approach (the background to which is set out in the Health Topic Paper) by supporting the social and economic development of the city as well as improving access for residents to social infrastructure, public transport, open

[3] https://www.coventry.gov.uk/policy-1/coventry-marmot-city

green space, education and employment and good quality housing for all. Creating healthy places for the future, where the healthy choice is the easy choice for residents.

Climate change and reducing emissions in the city is another fundamental issue underpinning all policies of the Local Plan review. The five development pathways in the Council's draft Climate Change Strategy are crucial to improving health and wellbeing. These include the pathways that seek to lower emissions; enhance biodiversity and urban ecosystems; increase the resilience of the city by providing better opportunities to improve the energy efficiency of homes; and reduce inequality and which is more people centred by improved access to open space, improving air quality and promoting healthier eating options. These are themes which are addressed throughout the plan, not just through the policies on health: like climate change, health is a cross cutting issue.

Policy HW1 Health Impact Assessments (HIA)

It is considered that Policy HW1 is important as it reflects the Council's priorities for promoting good health, reducing the disparities in deprivation across the city, addressing health inequalities and underpinning our Marmot City approach. The policy will also be important in terms of responding to the impacts of the Covid-19 pandemic, both in terms of the mental health consequences and the changes in people's personal and work life patterns.

Health can't be treated in isolation with many factors influencing our physical and mental health. Other chapters and policies in the Local Plan also play an important role in addressing health and wellbeing and new developments can play a significant role in reducing inequalities experienced across the city.

While Coventry has shown an overall pattern of improvement in the English Indices of Multiple Deprivation (IMD) relative to other Local Authority areas, it still has some of the highest levels of deprivation in the country with significant inequalities between neighbourhoods in the City. It is proposed to strengthen Policy HW1 to reflect the Council's priority to ensure all residents can lead a healthy lifestyle regardless of where they live.

We are proposing to change Policy HW1 to better recognise the importance of considering health outcomes through the planning system. Currently, Policy HW1 only requires major developments that meet defined criteria to undertake a HIA, and the associated Health Impact Assessment Supplementary Planning Document (SPD) sets out these criteria in detail.

We think every major planning proposal should have specific regard to health matters. Therefore, we suggest that Policy HW1 should be altered and expanded so that all major applications are required to demonstrate how they have considered relevant health and wellbeing issues through the submission of a supporting statement, which could, for example be included within the Design and Access Statement.

In terms of HIAs, we also propose that the threshold for when a full HIA must be carried out for housing developments should be lowered from the current 150 dwelling threshold. This is because many of Coventry's housing sites are smaller than 150 homes yet can have a significant impact upon on people's physical and mental health. The threshold would need to balance the Council's priority to protect and improve the health of residents while keeping it proportionate to the size and type of development proposals.

We also think the Health Impact Assessment SPD will ultimately need updating in line with any changes which are made through this review.

Relevant Health and Wellbeing Issues:

Our Topic Paper on Healthy and Safe Communities sets out the issues in Coventry, sets out the wider context relating to physical and mental health, summarises national and local key policy and guidance. In summary they key issues include:

- **Climate Change:** the importance of the linkages between climate change and health (also addressed through the Climate Change Topic paper), this is especially relevant to the Adaptation and Resilience pathway where extreme weather events such as the increased risk of heatwaves during the hot and dry summers create associated health risks to certain vulnerable groups, and the 'Equitable Person-centred development' pathway of the Council's draft Climate Change strategy as the vulnerable are most likely to suffer the most from the consequences of climate change.
- **Housing**: The quality of housing that someone lives in plays a huge role in their lives: poor quality housing has the potential to have a significant negative impact on someone's health. Issues associated with poor housing such as poor ventilation, damp, overcrowding, inadequate heating and energy efficiency, fuel poverty, affordability and availability can all have impacts on both physical and mental wellbeing. This is an issue which particularly impacts those on the lowest incomes.
- **Transport and Accessibility:** Connection to the community is an important consideration for ensuring people do not become physically and socially isolated, whilst also ensuring that people are able to access everything they need, including access to amenities, healthcare, employment and community facilities. Encouraging and supporting the use of active travel (walking and cycling) and use of public transport is a vital consideration here, to contribute to improved air quality (by reducing travel by car) and to personal wellbeing (mental and physical) for all, including those with disabilities.
- **Education and Employment –** Educational achievement is a vital consideration in the wider context of health outcomes, it can have a profound effect on people's life outcomes. Poor educational achievement is not only observed to potentially contribute to social alienation, but also has direct effect on people's employment opportunities. Alongside considerations relating to educational achievement, delivering inclusive growth is too observed as vital consideration in helping to address and overcome existing health inequalities.
- **Access to Green and Open Space**– The provision of good quality open and green spaces is a fundamental consideration in improving both physical and mental health outcomes. Not only does access to good quality space encourage people to be more active, but it can provide a valuable respite from busy urban life. Spending time in such spaces is observed to result in positive physical and mental health outcomes. Such spaces include space for play and physical recreation, for growing food, for walking, cycling and socialising. The provision of good quality, well connected and maintained open and green spaces also increases biodiversity and wildlife; supports measures for increasing shading to help mitigate the urban heat island effect; supports the Council's Urban Greening Factor proposals set out in the Greenspace and Biodiversity chapter; and mitigates the effects of flooding and urban drainage, all of which contribute to the health and wellbeing of residents.
- **Social Infrastructure:** Neighbourhoods that provide people with local, walkable access to everything they need such as schools, childcare facilities, health centres, local and healthy food shops, public buildings, open spaces, sport facilities and community facilities are fundamental in delivering better health outcomes. They can also provide opportunities for social interaction and a sense of community, vital for reducing social isolation.
- **Designing safe and healthy places** – People need to feel safe in their neighbourhoods, a fear of crime can impact people's mental health in a negative manner. Planning and design have an important role to play in

helping to make places safer. This includes, improving public realm, providing suitable community facilities and drawing on good design in order to combat crime. The utilisation of good design is also a fundamental consideration in helping to deliver healthy places, good design can contribute to improvements such as encouraging active travel or responding to climate change. The inclusion of 'shelter belts' can also help to conserve energy and reduce exposure to noise and pollutants. Places should be safe and healthy for all

- **Environmental Hazards:** The environmental conditions that people live in can have a profound effect on people's health, both mentally and physically. Ensuring that people are able to live free from dangerous levels of pollution is fundamental, examples of such pollutants include noise and air quality. In addition to this, the need to tackle both the causes and consequences of climate change, such as heatwaves and flooding and the need adapt to changes will prove to be a major point of focus in improving health outcomes.
- **Food environment:** One of the challenges the Council faces in promoting healthy eating is the easy availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas, along with the lack of easy access to healthy food choices. This is a particular concern in areas of social deprivation where fast food may also be the only readily accessible affordable option. This is considered further in our review of town centre policy later in this document.

We suggest an expanded Health policy would expect new development to help improve quality of life within the city through promoting healthy lifestyles, supporting the creation of healthier communities and helping to reduce health inequalities.

For those developments which would not trigger the need for a full Health Impact Assessment we propose that a checklist could be produced requiring that developers demonstrate (where relevant) how their proposal considers the above issues.

We suggest that one way of achieving this could be through the validation criteria, requiring applications to address the aforementioned health related topics through their Design and Access Statements, or through a supporting health statement. It is also suggested for Outline applications that this should be demonstrated and addressed at both the Outline and detailed stages to reflect the evolution of development proposals from gaining outline planning permission to the reserved matters being submitted.

Proposed checklist topics

Below are the suggested health related topics that we think could be considered by all major development proposals in a checklist (where a full HIA is not needed).

- Address the causes and consequences of climate change (cross reference to climate change policy), mitigating for potential negative health impact.
- Be well-connected to encourage active travel and public transport use (cross reference to transport and environmental management policies).

- Support the delivery of, or use of, essential community services and social infrastructure for the inclusion of all members of society, which includes accessible childcare facilities, health services, day centres, educational facilities, healthy food options and a range of other formal and informal uses (cross reference to community policies).
- Promote the diversity of all groups in society and the inclusion of vulnerable groups.

- Promote well designed and safe places that are inclusive, but which design out crime and feel safe for all members of society (cross reference to design policies)
- Address neurodiversity, with developments having regard to how different people experience and interact with the world around them, and how the layout and environment created will impact on them, their health, and their enjoyment of space with an emphasis on legibility, permeability, use of landmarks, open spaces, street furniture, and the hierarchy of and access to busy and less busy spaces.
- Promote the development of high quality and well-designed housing for all, which includes the provision of energy efficient affordable and social housing, retirement housing, housing with care, sheltered housing / homeless accommodation and housing that is adaptable to reflect the different stages of people's lives. There should also be a higher emphasis on the provision of carefully orientated private outside amenity space in all housing developments (cross reference to housing policies) which could mean balconies in high density areas coupled with access to high quality public realm.
- Promote improvements to the existing housing stock in the city to ensure it is free from damp, is well insulated and energy efficient.
- Provide and protect access to open space, children's playgrounds, allotments and leisure and recreation facilities to promote active lifestyles; the greening of developments; and the increase in biodiversity and wildlife; and to mitigate the impacts of the urban heat island affect and of flooding and urban drainage, all of which contribute to the physical and mental health and wellbeing of residents (cross reference to Green Infrastructure policies).
- Promote vibrant town centres that provide people with access to a diverse range of uses, whilst seeking to avoid the overconcentration of uses that can have a negative health impact, for example Hot Food Takeaways, betting shops, etc. (cross reference to retail and centres policies).
- Promote a diverse local economy to meet a range of needs and skills.
- Support measures to promote walking and cycling (cross reference to transport and accessibility polices).
- Minimise exposure to and improvements in air, noise and vibration, and light pollution (cross reference to environmental management policies).
- Promote digital inclusion across all parts of the city with access and training in the use of the internet available to vulnerable groups.
- Contribute to local health infrastructure where this is justified and relevant to the and where there is a genuine and evidenced funding gap (cross reference to infrastructure policies).

QUESTION 1

Do you have any comments on our proposal to expand policy HW1 so that all major developments are required to demonstrate how health issues have been considered and addressed either within the Design and Access Statement or separate supporting health statement?

QUESTION 2

Do you have any comments on the proposed checklist and its content?

QUESTION 3

Given the significant implications development proposals can have on people's physical and mental health, what do you think the proportional threshold for housing developments requiring a full HIA should be:

A. Unchanged – 150 dwellings or more – please explain why
B. 100 dwellings or more – please explain why
C. 50 dwellings or more – please explain why
D. Other – please explain why

QUESTION 4

In terms of Outline applications and given how development proposals can change between outline approval and the reserved matters stage, when should HIAs and health checklists be required?

A. At Outline stage only – please explain
B. At Outline and reserved matters stage – please explain

Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate

Preamble – the City's priorities for sustainable development and addressing climate change

As set out in the introduction, the Council's One Coventry Plan focuses upon sustainable development by supporting a strong and resilient economy, being a city which supports its residents and which embeds environmentally-friendly behaviour, lessening the pressures caused by climate change

Ensuring appropriate levels of sustainable growth will enable the reviewed Local Plan to contribute to addressing all five pathways of the draft Climate Change Strategy, set out in the introduction but reiterated here to emphasise their importance:

- Low emission – new economic opportunities
- Nature-based – enhance the biodiversity and urban ecosystems
- Circular economy – new models of production and consumption
- Resilient – anticipate, prevent, absorb and recover from shocks
- Equitable and people-centred – inclusive urban communities, addressing poverty

The National Planning Policy Framework (NPPF) already requires us to deliver sustainable development, balancing economic, social and environmental objectives as set out in Chapter 1 (Introduction). It is therefore vital that the level of development addresses our needs and ambitions whilst retaining the essential balance to ensure it is sustainable.

The NPPF states:

'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom– have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection' (NPPF 2021 Para 7).

The review of the Local Plan has to be accompanied by a Sustainability Appraisal, and at this stage of the review we have commissioned an independent appraisal of our review to help guide us towards a final version, ensuring that we are taking the above principles into account and providing a steer if it is considered we may need further evidence. The Sustainability Appraisal is being consulted upon alongside this document.

It is within this context that the overall levels of growth are reviewed, to ensure that we are able to plan to ensure we are 'meeting the needs of the present without compromising the ability of future generations to meet their

own needs' as cited by Resolution 42/187 of the United Nations General Assembly, and reiterated as an underpinning principle of the NPPF.

Policy DS1 Overall Development Needs

Policy DS1 is a strategic policy which sets out the amounts of growth which Coventry needs to deliver between 2011 and 2031. The plan was adopted in 2017, evidence should be no more than five years old and therefore the evidence base needs to be updated along with the plan period .

Along with our local authority partners across Coventry and Warwickshire we have published a new Housing and Economic Development Needs Assessment (HEDNA) which sets out how much housing and employment growth (and of what type) we all need to be planning for to the year 2041.

The **Housing Topic Paper** sets out three potential housing growth scenarios and explains how the figures are arrived at.

- **Scenario 1** is the Government's Standard Method calculation. This is the 'default' method set by Government and utilises the 2014 Population Projections, which have been shown to be erroneous for Coventry, significantly overestimating future need. This error has been admitted by the office for National Statistics. This method gives Coventry a total minimum need of 63,760 new homes over the plan period.
- **Scenario 2** is the HEDNA figure. This uses the more accurate 2021 Census data as an input to the calculations instead of the erroneous 2014 figures. This gives a need of 39,280 new homes over the plan period for Coventry.
- **Scenario 3** is the HEDNA figure but with the 35% uplift removed. The Government has applied this uplift to England's 20 largest cities, but the figure is not justified and appears entirely arbitrary, having no relevance to addressing local need. Removal of the 35% uplift gives a need of 29,100 new homes over the plan period.

The Council's view is that Scenario 3 represents the true need for Coventry, as it is based on the best available evidence. The Council therefore considers that this is the figure that we should deliver and is seeking views on this approach.

Table 1: summary of housing need alternative calculations

	Government default Standard Method (using the 2014 Population projections)	**HEDNA method (using the 2021 Census data)**	**HEDNA method with 35% uplift removed**
Dwellings per annum	3,188	1,964	1,455
Total need over the 20 year plan period 2021 - 2041	63,760	39,280	29,100

QUESTION 5

Do you have any comments on the Council's view that it should be using the HEDNA figure with the 35% uplift removed to establish its local housing need ?

QUESTION 6

Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider?

Employment Land Needs

The HEDNA has determined that the most appropriate Functional Economic Market Area (FEMA) is aligned to the Housing Market Area (HMA) and that Coventry and Warwickshire remains an appropriate 'best fit'. The HEDNA states (para.1.9): 'Inevitably functional market areas clearly do not precisely fit to local authority boundaries; and at the borders of any area HMA there are often links with the adjoining areas. Plan making activities should therefore continue to recognise overlaps in North Warwickshire and Stratford-on-Avon with the Birmingham HMA and FEMA; between Rugby and West Northamptonshire; and local links across the A5 with Hinckley and Bosworth (which is in Leicestershire).'

The HEDNA has modelled figures for employment land upon labour-demand modelling for office needs, gross completions trends for industrial and warehousing uses, and a margin for flexibility to take account of the fact that forecasting is not an exact science, that location and size requirements will vary and that there may be delay in sites coming forward.

The HEDNA provides the following figures for Coventry:

Table 2 - Employment Land Needs for Coventry 2021 – 2041 (Hectares, measured as developable land)

Office	General Industrial (excludes strategic B8)	Total
8.5	147.6	**156.1**

It should be noted that, there is a separate calculation for 'strategic B8' which is the growth of the logistics sector, and which relates to warehousing units over 9,000sq.m (100,000 sq.ft). Because of the scale and nature of this kind of development it needs to be considered at a strategic scale therefore the need across the whole of the Coventry and Warwickshire sub-region is projected to be 551 hectares to 2041. Partners in the sub-region have joined with partners across the wider West Midlands to produce a West Midlands Regional Strategic Employment Sites Study to better understand the issue and to plan for growth accordingly. This piece of evidence is due summer 2023

The employment section of this Issues and Options paper reviews the city's current supply pipeline as well as the allocations for employment land.

QUESTION 7

Do you have any comments on the overall Employment Land Needs for Coventry?

We have also commissioned a new Retail and Centres study to help us understand the issues and changes now occurring in this sector and we cover this in Chapter 6, Retail and Centres.

Policy DS2 The Duty to Co-operate

Policy DS2 was produced to reflect the Council's commitment to co-operate with partners on a range of matters including housing, economic growth, infrastructure, regeneration, transport, health and the environment. The policy refers to key growth and expansion projects at Jaguar Land Rover (Whitley), the University of Warwick, Coventry Gateway, Ansty Park, Pro-Logis Park at Keresley and residential development south of the City boundary, and sets out the Council's commitment to collaboration in order to effectively deliver these strategic schemes.

The policy also references the need to support the work of the sub-region in particular citing the Coventry and Warwickshire Local Economic Partnership (CWLEP)

We think this policy could be improved. The statutory Duty to Co-operate remains in place at the time of writing although the policy should now include reference to Statements of Common Ground to reflect updated national Planning Practice Guidance.

LEPs have been phased out by Government but we think we should replace the CWLEP references with reference to the work of the West Midlands Combined Authority (WMCA) of which Coventry City Council is a constituent member.

We think there is an opportunity to improve the wording at Part 3 of the policy. At the moment this refers to supporting joint evidence, but it could be expanded to refer to the delivery of joint projects where they support the objectives of the relevant plans.

We think the wording of part 5 could be strengthened to include reference to a joint monitoring approach.

QUESTION 8

Do you have any comments on our proposed amendments to Policy DS2?

Policy DS3: Sustainable Development Policy

Policy DS3 specifically reflects the National Planning Policy Framework and therefore we consider that this element of the policy does not need updating. However, we consider that the policy now needs to be updated to reflect the priorities of the One Coventry Plan and of the emerging Climate Change Strategy (which is currently in draft form and was consulted on early 2023)

QUESTION 9

Do you have any comments on our proposals to update Policy DS3?

Policy DS4 Part A (General Masterplan Principles), Part B (Whitley), Part C (Keresley SUE) Part D (Easter Green SUE)

We think that there is an opportunity to update Part A of this policy to strengthen references to design both in term of design guidance nationally, and its local application. The Design Topic Paper explains the context to this, and changes would be cross referenced to updates to the design policy section.

QUESTION 10

Do you have any comments on our proposed updates to Part A of policy DS4?

As set out in the Green Infrastructure and Biodiversity Topic Paper we also think DS4 parts xi and xii. must emphasise the importance of biodiversity and green infrastructure in the general wellbeing of a city, highlighting a need to increase tree coverage, wildlife-friendly buildings and create new green spaces to improve health indicators and provide climate resilience.

We think the site-specific elements of the policy (parts B,C and D) should remain largely unchanged although use-class references should be updated to reflect national legislative change. This is because progress on these sites are underway and it would not be appropriate to alter any context which could affect planning applications and site delivery. We feel the wording remains robust.

QUESTION 11

Do you agree that we should make a minor change B, C and D in terms of changing the references to use classes to reflect new legislation?

Chapter 4: Jobs and Economy

Preamble - the City's priorities for sustainable economic development and addressing climate change

The Local Plan will support the aim of the One Coventry Plan to increase the economic prosperity of the city and region and promote job and employment opportunities including in the main growing business sectors in the city, which include advanced manufacturing and
engineering; energy and low carbon; connected autonomous vehicles; business, professional & financial services; digital, creative, and gaming. However, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures, which the local plan will try and align with the One Coventry Plan on to address.

The Local Plan, by promoting the five development pathways in the Council's Climate Change Strategy, can also better align with the corporate aims for jobs and the city's economy, specifically by promoting the pathway of lowering emissions and promoting the circular economy and the new economic and job opportunities that could be delivered from that. Also, by addressing the reliance pathway and reducing the risks of climate change and extreme weather events such as flooding, heatwaves and droughts can allow the city to function more sustainably and more self-sufficiently having a positive impact on the economy. The Local Plan will also align with the Councils Economic Development Strategy which will create a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created.

The Council's Economic Development Strategy[4] is focused upon creating a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created. This includes emphasis upon a strong support infrastructure, social value, sustainability, skills, and an ambition to lead in the green industrial revolution to tackle the challenges and opportunities presented by climate change.

Defining the economy and 'employment' in planning terms

The explanatory text to this chapter in the current adopted plan states that the employment policies and references to 'employment land', 'employment uses' and 'employment purposes' relate only to development falling within Use Classes B1, B2 and B8 of the Town & Country Planning Use Classes Order 1987 as amended. These comprise business offices (Use Class B1a), research and development activities (Use Class B1b), light and general industrial uses (Use Classes B1c and B2) and uses within the storage/distribution sector (Use Class B8).

This is now out of date because the Use Classes Order was amended in 2021, so Class B1 (light industrial use) now sits within a new Use Class E. Light Industry comes under Class E part g) i) office ii) the research and development of products or processes or iii) any industrial process, (which can be carried out in any residential area without causing detriment to the amenity of the area).

[4] https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/2

Therefore; any definition relating to 'employment use', as the plan currently stands, can only relate to Class B2 (general industrial) and Class B8 (storage / distribution).

We are therefore considering how we deal with this matter. If we replace the reference to Class B1 with E(g) when we define 'employment use' this gets complicated as there are several uses within the wider Use Class E to which light industry can change under Permitted Development rights ie no planning application is needed. This means it is also very hard to monitor and track progress.

The Housing and Economic Development Needs Assessment (HEDNA) calculates need and supply using the following categories: Offices, Class B2 (general industrial) and Class B8 (warehousing – ie storage and distribution). If we are to protect our supply and track progress through monitoring, we need a new approach to ensure that our employment provision can be properly managed and does not get eroded.

Proposed new policy: defining 'employment'

Based on this information, we are proposing the following policy in terms of how we define 'employment'.

For the purposes of supply (and therefore monitoring) we propose that this relates to:

- Class E Part g (i to iii), plus classes B2 and B8

For the purposes of decision making we propose that this relates to:

- Class E Part g (i to iiii), Classes B2 and B8, and other uses which can clearly demonstrate that they serve an employment purpose in the local economy

In terms of decision making we think in some instances we may need to remove Permitted Development rights to protect key employment sites from being changed to other uses without due consideration through the planning process. However, we need to be mindful that the flexibilities afforded by the new Class E are to enable the market to be able to respond to rapid change so such restrictions must be used sparingly and with careful consideration.

Allocated employment sites are clearly fundamental to the strategic aims of the Local Plan, however there will be other existing sites of varying size and nature which are high quality and / or which provide an important employment role locally. We are proposing to undertake an Employment Land review (ELR) which will categorise our employment sites and enable us to make a balanced judgement as and when planning applications come forward as to whether they should be protected for employment use or whether they might be suitable for other purposes. A new policy would provide a 'hook' to the ELR.

QUESTION 12

Do you have any comments on our proposals to introduce a new policy which defines our definition of 'employment' for planning policy purposes?

Policy JE1: Overall Economy and Employment Strategy

Policy JE1 is a general policy which provides positive support for Coventry's economy. We think that a few minor updates are needed(for example we need to include reference to the role of the West Midlands Combined Authority, updates to replace references to the Ricoh Arena and so on).

However, in order to better reflect the One Coventry Plan and the emerging climate change strategy we suggest that the policy could be strengthened.

We think that this policy should positively support employment which helps the area achieve its ambitions to be a leader in the Green Industrial Revolution, which operates to the highest energy efficient standards, which is involved in the development and production of new technology which addresses climate change. We also think the policy should support retrofitting for employment where appropriate, and should encourage the use of renewable energy including maximising roof space for solar panels for example

We also feel we should be supporting employment which is sustainably located, for example employing and training local people who can access jobs by walking, cycling and by public transport, and which is linked to a range of other services and infrastructure which support employees, for instance childcare facilities.

We also want to see more employers provide green infrastructure as part of their development proposals, linking to the review of our policies on Green Infrastructure and biodiversity, creating a much better connected network of green links across the area. Well planned and maintained open green space also creates an important environment for employees, with positive health benefits (see Chapter 2, health), and is attractive, helping to attract investment in an area.

QUESTION 13

Do you have any comments on our proposals that Policy JE1 could be strengthened in line with our proposals?

QUESTION 14

Do you have any comments, or local evidence which might be helpful in assisting us develop standards for new employment sites?

Policy JE2: Provision of Employment Land and Premises

Policy DS1 sets out the quantum of employment growth for the plan period.

We consider that this policy needs updating in terms of the quantum of development. The starting point will be the strategic options for growth as set out in our review of Policy DS1. We are asking for comments in the section: Overall Development Needs.

Once we have determined what figure we think sets an appropriate strategic need we need to look at what can realistically be delivered within Coventry's administrative area.

In terms of the supply from 2021 – 2041, initial calculations indicate the following:

Available Employment Land at March 2023

Site type and status	Hectares (Net)
Non-allocated sites under construction	0.08
Non-allocated sites with permission but not yet started	1.98

Total non-allocated employment sites coming forward	2.06
Allocated sites with planning permission	-0.19 [1]
Allocated land without permitted planning permission	58.48
Total available employment land	**60.35**

1 Excludes City Centre South due to unknown quantum at this stage.
Data taken from HELAA FIGURES TO BE CHECKED

Policy JE2 will need updating to reflect the current position on the current Local Plan employment allocations, which are summarised in the following table:

Table 3 Employment Land Supply at September 2022

Site Ref	Site	Ward/LPA	Remaining Area Ha	Employment Type
JE2:1	Friargate (part of mixed use site)	St. Michael's	6.52	Primarily B1a
JE2:2	Lyons Park	Bablake	Completed	B1, B2 & B8
JE2:3	Whitley Business Park	Cheylesmore	6.46	B1b&c, B2 & B8
JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	25	B1b&c, B2 & B8
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	B1b&c, B2 & B8
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	2.5	B1b&c, B2 & B8
JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	B1b&c & B8
JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	B1c & B8
	TOTAL		**58.48**	

The HEDNA provides commentary and makes assessment of employment land needs across the sub-region and for each individual local authority within the sub-region. It assesses employment land based on three types: Office, General Industrial/warehousing and Strategic B8.

The table below compares, by use class, the existing supply of employment land, the need figure as evidenced in the HEDNA and as a result, whether there is an over or under supply.

Table 4 Supply vs Need

Land Type	Existing Supply (ha)	HEDNA Figure (ha)	Over/Under supply (ha)
Office	6.61	3.9	2.71 over supply
Industrial	26.87	-8.9	17.97 over supply
Warehousing/Distribution	26.15	17.8	8.35 over supply

Note: A number of sites are allocated for a combination of B1 (E, B2 and B8 uses have been included in the above chart. Given the uncertainty around their delivery and the mix of uses, these sites have been divided equally between B2 and B8, with an assumption that and B1 use is ancillary. This is based on the nature of the sites and their location and future uses.

QUESTION 15

Do you have any comments on the supply of employment land?

QUESTION 16

We are always keen to understand the employment land needs from local businesses and residents. Therefore, do you have:

A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1

B. A site you would like us to investigate? Please provide as much detail as you can

C. Another suggestion or comment – please provide detail

Part 3 of the policy refers to 58ha 'rolling supply'. Whilst it is important that the policy recognises the need for a supply of sites throughout the plan period to be able to respond to need, we think that monitoring against the overall requirement and performance of the allocations over the plan period, supported by positive policy elsewhere in this chapter should be sufficient as there is no national requirement to report on a specific annual figure and the NPPF emphasis is about being clear on locational requirements and the ability to adapt to rapid change. We therefore propose to change the emphasis of Part 3 of the policy to reflect the emphasis in the NPPF.

We also propose to produce an Employment Land Review (ELR) which would enable us to define and protect our highest quality employment premises (of all sizes) whilst allowing flexibility in the market elsewhere to ensure it can respond to rapid change without undermining a sustainable, balanced strategy. We would reference the need to have regard to the ELR in decision making in this policy as set out earlier in this chapter.

QUESTION 17

Do you have any comments on our proposed changes to part 3 of Policy JE2?

Policy JE3 Non-employment uses on employment land

In terms of the definition of 'employment land' and what therefore can be categorised as a 'non employment use' for this purpose is considered at the start of this chapter and we welcome comments on this and our proposals to broaden the definition as the policy is felt to be too restrictive at present.

In terms of the policy wording itself (notwithstanding the wider context in terms of defining 'employment') we think this remains largely up to date. However, we think one aspect can be improved. Part 1 of the policy protects employment uses stating:

> *Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where nonemployment development is proposed are:*
>
> *a. No longer suitable for employment use bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land-uses* ***and*** [our emphasis] *there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; ….*

It is our view that if a site is clearly not suitable for employment due to the reasons cited, then marketing should not be required. Therefore we proposed that 'and' is changed to 'or': ie

> *a. No longer suitable for employment use bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land-uses* ***or*** [our emphasis] *there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; ….*

QUESTION 18

Do you have any comments on our proposed changes to JE3 Part 1a?

QUESTION 19

Do you have any other comments regarding policy JE3?

JE4 Location of Office Development

Chapter 3 deals with revised overall growth needs and references the HEDNA figure which recommends up to 8.5 HA for office provision over the plan period (to 2041). Policy JE4 is delivered in this context.

It is our view that the intent of the policy remains largely fit for purpose (ie to deliver an appropriate amount of office space in sustainable, mainly town centre locations), however in order to bring it up to date we propose the following changes:

- The reference to Friargate Class B1 office development needs to be changed to Class E g (i) as this reflects changes to the Use Classes Order
- Permitted Development rights should be removed from major office developments to avoid undermining the aim of the Local Plan to deliver a sustainable and balanced strategy
- References to 'large scale' office development should be replaced with 'major' office development

- We think references to the need for offices to be close to a primary route on the highway network does not fit in with the climate change agenda and that this should instead be changed to refer to sustainable modes of transport
- Part 5 of the proposals refer to the need for an Impact Assessment as this was, at the time, required by national policy. This is no longer the case, so we propose to delete this and instead rely upon the sequential test.

QUESTION 20

Do you have any comments on our suggestions for proposed changes to Policy JE4?

JE5 Location of R&D, Industrial and Storage / Distribution Development

We are interested in exploring the review of this policy further. It is our initial view that the Research and Development and Industrial / Storage and Distribution markets are very different and might be better addressed through two separate policies.

Firstly, in terms of industrial use, Storage and Distribution, Chapter 3 sets out the overall needs as determined by the HEDNA. This separates out 'strategic B8' which is of such a scale that it can only be properly considered at the regional scale and this work is ongoing across the region separately.

In terms of proposals for more localised industry, storage and distribution we feel the current policy wording is still applicable and would be relevant to a separate Industrial and Storage / Development policy.

In terms of the Research and Development sector however, whilst much of this is undertaken on large business / science parks we feel this is not exclusively the case (for example laboratories linked to universities, other emerging sectors) and we want to understand more about the locational and operational needs of this sector to ensure our policies support this.

QUESTION 21

Specifically in terms of general industrial, storage and distribution matters (not research and development which we consider separately), do you consider that the wording of policy JE5 is still up to date?

QUESTION 22

In terms of research and development needs do you think the wording of Policy JE5 is still relevant or do you think we need to recognise it as a separate issue? What evidence do you have which can help us better understand the needs of the sector?

QUESTION 23

Are there other sectors we should be considering in being able to support their specific needs? What are these needs and do you have any information and evidence which would help us understand and accommodate these?

JE6 Tourism / Visitor related development

We think this policy could be strengthened as it needs to be aligned to the NPPF and to treat tourism use as a defined 'main town centre use' to ensure tourism and culture are more strongly supported within the local context.

QUESTION 24

Do you have any comments on our suggestion that policy JE6 should treat tourism as a main town centre use?

QUESTION 25

Do you have any other comments or suggestions relating to tourism and Policy JE6, including evidence if this is applicable?

JE7 Accessibility to Employment Opportunities

This policy seeks to ensure that local people, especially those from the most deprived communities, are given opportunities to access employment from new or expanded developments. We think this policy remains relevant and up to date although reference to CIL should be updated to 'developer contributions' to ensure it remains resilient to future changes by Government.

QUESTION 26

Do you have any comments on our view that this policy remains up to date?

Chapter 5: Housing

Preamble - the City's priorities for sustainable housing development and addressing climate change

Since the origins of the planning system, it has been identified that health and good quality housing are intrinsically linked with the latter being so important or the health and wellbeing of residents. In line with the One Coventry Plan, the Local Plan will promote the building of both high-quality affordable housing and a range of size and type of housing to meet demand in the city, which also includes social housing. The Local plan will align with the corporate aim of the One Coventry Plan to deliver more social housing to those that need it most, which is also community led and has community involvement at its heart.

The five development pathways in the Council's Climate Change Strategy seeks to improve the energy efficiency of the City's housing stock, creating a more resilient city that better responses to the risks of climate change and extreme weather events such as flooding, heatwaves and droughts as well as the lowing of overall emissions, which the Local Plan will also promote to align with these Corporate housing objectives.

Policy H1: Housing Land Requirements

We consider that this policy needs updating in terms of the quantum of development. The starting point will be the strategic options for growth as set out in our review of Policy DS 1. We are asking for comments in that section: Overall Development Needs.

Once we have determined what figure we think sets an appropriate strategic need we need to look at what can realistically be delivered within Coventry's administrative area.

In terms of the supply from 2021 – 2041, current calculations indicate the following:

Table 5: supply

Housing land supply	Number of Homes
Past net completions	3,818 (2021 /22 monitoring year)
	1,620 (2022 / 23 monitoring year)
Call for brownfield sites	1,200 (approx.)
Sites with planning permission (includes those under construction but not completed)	11,914
Local Plan allocations – remaining capacity	3,151
City Centre Area Action Plan Remaining Allocations	455
Windfall	3,000 (2026 onwards)*
Total	**25,158****

*See AMR for explanation on how calculations are worked out. NB no windfall figure included in first 3 years of deliverable tranche to avoid potential double counting with permissioned sites which have not yet been developed.

**Figures as of 31st March 2023

It is important that we can accommodate as much of our identified need as possible, therefore further work on this will need to be undertaken to see whether any parts of the city can accommodate increased densification. Present policy applies a density of 200 dwellings per hectare (dph) within the ring road but we could look at areas adjacent to the outer edge of the ring road too. We need to be careful however that we have a balanced sustainable strategy which addresses climate change, delivers a high standard of healthy living, provides local employment, and accessible services and facilities and this is also considered in the accompanying Sustainability Appraisal. Further work will be undertaken to explore opportunities in this regard.

The NPPF is clear that a 'brownfield first' approach needs to be applied, therefore this is the approach that will be undertaken in the review of this plan.

QUESTION 27

Do you have any suggestions which can help us meet our housing need within our area?

A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1
B. An area you think could be densified which still achieving a high standard of living? Please provide as much detail as you can

C. A site you would like us to investigate to see if it might be suitable for housing? Please provide as much detail as you can
D. Another suggestion or comment – please provide detail

Policy H2 Housing Allocations

This policy will need updating. The current position on the housing allocations is summarised here

Table 6: status of housing allocations

ALLOCATION	ALLOCATION REFERENCE	OVERALL SITE STATUS
Keresley SUE	H2:01	UNDER CONSTRUCTION
Eastern Green SUE	H2:02	UNDER CONSTRUCTION
Walsgrave Hill Farm	H2:03	NO APPLICATION
Meggit site Whitmore Park	H2:04	UNDER CONSTRUCTION
Paragon Park	H2:05	UNDER CONSTRUCTION
Land at Browns Lane	H2:06	NO APPLICATION
Land at Sutton Stop (mixed use JE2:8)	H2:07	APPEAL OUTLINE ALLOWED
Land West of Cromwell Lane	H2:08	N/S
Land at London Road/Allard Way	H2:09	AWAITING RESERVED MATTERS
Former Lyng Hall Playing Fields	H2:10	COMPLETE
Elm Fields Farm	H2:11	AWAITING RM
LTI Factory, Holyhead Road	H2:12	FULL PENDING
Grange Farm	H2:13	COMPLETE
Former Transco Site, Abbots Lane	H2:14	APPEAL PENDING
Land at Sandy Lane	H2:15	PENDING OUTLINE
Land at Carlton Road	H2:16	NO APPLICATION
Chestnut and Hawkesmill Nursery Sites	H2:17	COMPLETE
Former Mercia Sports Centre, Kingfield Road	H2:18	COMPLETE
Land at Mitchell Avenue	H2:19	NO APPLICATION
Land at Durbar Avenue (mixed use JE2:7)	H2:20	NO APPLICATION
Woodfield School Site, Stoneleigh Road	H2:21	OUTLINE PENDING
Land at Jardine Crescent	H2:22	APPEAL PENDING
Cryfield Heights	H2:23	COMPLETE
West of Cheltenham Croft	H2:24	AWAITING RESERVED MATTERS
Grange Childrens Home, Waste Lane	H2:25	PENDING

In line with feedback from comments relating to the review Policy H1 we will need to consider whether we should allocate further sites or identify areas where densities could be increased. If you have sites you would like to suggest or promote please do this via your response to Policy H1.

QUESTION 28

Do you have any comments on the review of Policy H2 (Housing Allocations)

Policy H3 Provision of New Housing

New standards to address climate change

We think more stringent standards to address climate change need to be introduced to ensure that net zero targets can be achieved – this issue is discussed under the Environmental Management chapter. This includes the potential to proactively address an increased shift to urban living including through advanced methods of construction including modular build.

QUESTION 29

Do you have any comments, including supporting evidence which can help us address introducing standards which can help us proactively address climate change in terms of residential development?

Other Residential Development Standards

Policy H3 sets out some broad criteria for considering a 'suitable residential environment'. These include broad accessibility standards, reference to 'adequate amenity space and parking provision' and to be safe from environmental pollutants. There is potentially an opportunity to strengthen the policy in terms of amenity and also to reference the recently adopted New Residential Design Guide Supplementary Planning Document, the Open Space SPD, and the Householder Design Guide SPD

Following on from this, in terms of Part 4 of the policy, there is an opportunity to improve the list of criteria to make them more meaningful and useable (for example 'within 400m of publicly accessible open space' does not take into consideration how (or if) that space can be safely accessed). It is worth considering whether the established Building for a Healthy Life principles should be used instead, and whether the policy should require

that development proposals should demonstrate how they have taken these into account: see https://www.udg.org.uk/publications/othermanuals/building-healthy-life

QUESTION 30

Do you have any comments on our proposals for introducing new policy on amenity?

QUESTION 31

Do you think we should require development to demonstrate how it has taken the Building for Healthy Life Principles into account?

It is considered that 'amenity' also includes living space and its configuration. It is essential that everyone should have the right to a decent standard of living and in areas where high density development is common it is especially important to ensure that living standards are not compromised.

The Government introduced the 'Nationally Described Space Standards (NDSS)' (March 2015) which is a set of optional technical standards for new residential development. These are included at Appendix 2 . The space standards are intended to ensure that new homes function properly as such, that there is sufficient circulation and activity space and that basic furniture, fittings and storage space can be accommodated

Given that Coventry is a highly constrained area, with an increased need to accommodate high density development we think there is a strong justification for protecting the health and wellbeing of the City's residents and ensuring that they have suitable accommodation which meets their needs. We therefore propose to formally introduce the Nationally Described Space Standards.

QUESTION 32

Do you have any comments on our proposals to adopt the National Described Space standards

Terminology and new / emerging models of housing

Updates to the terminology in the policy are needed to reflect the most recent Government definitions (for example 'First Homes' instead of 'Starter Homes'). However, we think that there are other opportunities to strengthen this policy (or indeed introduce new policy). We set out our ideas below, for comment, with further detail set out in the Housing Topic Paper.

We consider the need to give more emphasis to different housing types. At present the policy broadly makes reference to 'new residential development' and specific reference to opportunities for self-build and starter homes. There is a separate policy on 'affordable housing' which we review later in this document in line with Government's definition in the NPPF glossary, including affordable housing for rent, starter / first homes, discounted market sales housing and 'other affordable routes to home ownership'. We need to consider how future policy wording can be resilient to any subsequent changes to national policy.

For the purposes of this policy review, however, we focus upon new and emerging models which can be either market or affordable (or both), and which we think should have their own policy.

After this, we also focus upon other potential improvements to policy which we think will assist in delivering better quality proposals.

Build to Rent housing

The NPPF glossary defines Build to rent as '*Purpose built housing that is typically 100% rented out. It can form part of a wider multi tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development*'

We think we should have a policy which supports Build to Rent Schemes, as per paragraph 65 of the NPPF. The HEDNA provides clear justification for this: the target market is a younger demographic and the size of unit would generally be 1,2 or 3 bedrooms although this is not prescriptive.

The NPPF's definition of Build-to-Rent development sets out that schemes will usually offer tenancy agreements of three or more years and will typically be professionally managed stock in single ownership and management

control. It is advised through the HEDNA that it would be appropriate for the Council to adopt a consistent definition.

The HEDNA also recommends that the Council will need to consider affordable housing policies specifically for the Build-to-Rent sector. The viability of Build to Rent differs from that of a typical mixed tenure development: returns from the Build to Rent development are phased over time whereas for a typical mixed tenure scheme, capital receipts are generated as the units are completed. The Planning Practice Guidance advises that 20% is a suitable benchmark for the level of affordable private rent homes to be provided and managed in perpetuity. It also states that national affordable housing policy requires that there is a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The HEDNA supports this approach as being applicable to Coventry.

QUESTION 33

Do you have any comments on our proposals to introduce specific policy which supports Build to Rent in Coventry?

Co-Living

Co-living is not defined in the NPPF, however the HEDNA has explored this as, whilst (for the UK) the concept has mainly emerged in London there appears to be growing interest in other cities, including Coventry. Essentially, the model is based around accommodation with shared communal space (kitchen, lounge, social areas). Co living differs from Homes in Multiple Occupation (which tend to be conversions of existing properties, and for which we are producing a separate policy document). Because it is such a new model, the HEDNA looks to the London Plan's adopted policy which recognises that these developments may provide a housing option for single person households who cannot or choose not to live in self contained homes or HMOs. It refers principally to schemes which are generally of at least 50 units and provide an alternative to traditional flat shares and includes additional services and facilities. The target market tends to be a younger demographic.

The HEDNA co-living schemes could be delivered in the main urban areas of Coventry, Warwick and Rugby where there is a core demographic and tenant profile which would align with the target market of co-living housing. These areas are also well connected to local services and transport and would help support the night-time economy in conjunction with the existing student population.

The policy could expect that schemes would be under single management and offer rent with a minimum tenancy of no less than 3 months as well as align with local planning policies and space standards. Other local authorities have encouraged co-living development where it is located next to growth areas or major centres of employment, it meets zero-carbon objectives, where students are precluded from the development and where it applies maximum tenancy lengths.

The HEDNA comments that it might be prudent to limit the number of co-living developments in the city to enable this emerging model to be evaluated over time.

The HEDNA makes a number of recommendations for a Co-living policy

1. it is of good quality and design and adhere to minimum space standards (The Nationally Described Space Standards, which we refer to later in this section)

2. it is located centrally and is well-connected to local services and employment by walking cycling and public transport, and its design does not contribute to car dependency;

3. it is under single management;

4. The facility has a concierge or other adequate safety and security personnel;

5. its units are all for rent with minimum tenancy length of no less than three months;

6. communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:

a) convenient access to a communal kitchen with adequate facilities to meet the needs of all residents;

b) outside communal amenity space (roof terrace and/or garden);

c) internal communal amenity space (dining rooms, lounges) ;

d) laundry and drying facilities;

7. the private units provide adequate functional living space and layout, and are not self contained homes or capable of being used as self-contained homes

8. a management plan is provided with the application

9. it delivers a level of affordable housing (discounted private rent) (set at viable levels) or upfront cash in lieu of a contribution towards affordable housing or an annual contribution in perpetuity.

It is our initial view however that properly managed co-living, as with Build to Rent, could help us retain our graduates in the city and deliver much needed homes for the younger generation, and take the pressure off the number of HMOs coming forward. Currently Coventry University has a low graduate retention rate and such provision might enable more young people to remain living and working in the city, as well as attracting other young professionals to the area. However careful consideration would need to be given to how such proposals would be managed so they are distinguished from, and treated separately, to HMOs

QUESTION 34

Do you have any comments on our suggestion to introduce specific policy which supports Co-Living in Coventry?

QUESTION 35

Do you have any comments on whether we should set a limit on how much co-living we should allow so that we are able to review its impact over time given that it is an emerging model? If you think we should, what should the limit be, and what evidence could we use to provide robust and fair justification?

Custom and Self Build housing

The Self-Build and Custom Housebuilding Act 2015 provides a legal definition of 'self-build and custom housebuilding' which is where individuals or associations of individuals (or persons working with or for individuals or associations of individuals) build houses to be occupied as homes for those individuals.

Councils are required to keep a register of people who wish to undertake a self or custom build project in their area. Councils also need to show that they are granting permissions for enough suitable plots to meet the level of demand identified through the register.

Government is keen to advance the custom and self-build agenda, and this was incorporated into the adopted plan through Policy H3 which specifically supports custom and self build where it meets the criteria set out in the policy which includes limited infill within existing ribbon developments within the Green Belt.

In line with National Planning Practice Guidance the HEDNA has considered the issue of Self-Build and Custom Housebuilding for Coventry and Warwickshire. It recommends that the Local Authorities develop a specific policy, and in the areas of highest demand should consider whether to require a percentage of large sites to deliver self and custom plots.

In terms of Coventry, it is our view that it is appropriate for a separate self and custom build policy as this reflects national policy and guidance. However, it is not felt appropriate to require sites to provide a particular percentage of plots given that Coventry is such a constrained city where plots tend to be smaller brownfield sites or form part of wider, higher density regeneration schemes.

Furthermore, in regard to the element of current policy H3 which enables limited infill within existing ribbon developments within the Green Belt we have found this leads to speculative developments in unsustainable locations for example isolated rural sites which are reliant on the car. We therefore propose to delete this element of policy H3 and instead seek to steer self and custom build development to brownfield sites through a positively worded policy.

Another possibility in terms of supporting self build and custom housebuilding is to consider allocating a site, or sites, for this purpose only. The HEDNA proposes that in instances where sites are allocated or the percentage rule applies, there would need to be a fallback mechanism for example if plot(s) have been made available and marketed for at least 12 months and not sold, the plot(s) may either remain on the open market as custom build or be offered to the Council or a Housing Association before being built out by the developer.

We also think that the Local Plan, like the adopted Affordable Housing SPD, should positively support community-led housing schemes, and that reference could be made within this policy area.

QUESTION 36

Do you have any comments on our proposal to introduce a policy on Custom and Self Build Housing?

QUESTION 37

We propose to delete the part of Policy H3 which supports limited infill in the Green Belt as this is contrary to national Green Belt policy. Do you have any comments on this?

QUESTION 38

Do you think we should allocate a brownfield site (s) specifically for self and custom house building? If yes, how might we ensure such a site can be delivered?

QUESTION 39

Do you have any comments on the inclusion of support for Community-Led Housing in this proposed new policy?

Policy H4: Securing a Mix of Housing

This policy sets out a requirement that residential development includes a mix of housing which contributes towards a balance of house types and sizes across the city 'in accordance with the latest Strategic Housing Market Assessment'. The policy lists a range of factors which can also be taken into account including physical constraints, locational issues, severe development constraints which may impact on viability, sites where particular types of development are needed due to a heritage setting, and developments in parish or neighbourhood plan areas where there is an up to date local housing needs assessment.

The NPPF 2021 still requires a mix of housing (both market and affordable) to be delivered, and detail is set out in Section 5 of the Framework. We consider that Policy H4 remains robust within this context. It references the Strategic Housing Market Assessment, whereas the starting point for the mix could now be the Housing and Economic Development Needs Assessment (HEDNA), and it is important that the wording remains flexible in this regard to enable the latest evidence to be referred to given that market needs and Government priorities are likely to change over time and the plan needs to remain resilient and robust.

QUESTION 40

Do you have any comments on our proposed minor revisions to Policy H4 (securing a mix of housing)

Policy H5: Managing Existing Housing Stock

Policy H5 supports renovation and improvement of the housing stock, conversions to residential where this accords with other plan policies, and support for demolition and redevelopment schemes where this can be shown to be sustainable. This still accords with the NPPF in terms of optimising the use of available land (see for example NPPF paragraph 125). Utilising existing stock to ensure it it fit for purpose is an important aim of the climate change strategy, the housing and homelessness strategy and the One Coventry Plan, and is highly pertinent in a constrained and highly populated city environment.

We think this policy wording could be strengthened to include reference to energy efficiency in line with other policies of the plan

QUESTION 41

Do you have any comments on the review of Policy H5 Managing Existing Housing Stock?

Policy H6: Affordable Housing

The Housing Topic Paper sets out the changes to Affordable Housing delivery since the plan was adopted. In this context, the HEDNA analysis of affordable housing need is structured to consider the need for rented affordable

housing, and separately the need for affordable home ownership. It should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing), and this does not necessarily need to be met by new build. The HEDNA concludes that there is:

- A net need of 941 Social / Affordable rental housing per annum for Coventry (HEDNA Table 8.15);
- A net need of 149 Affordable Home Ownership dwellings per annum (HEDNA Table 8.27).

Having determined the net need, it is important that policy H6 reflects the changes to the NPPF since the Local Plan was adopted. NPPF paragraph 64 sets out that only 'major developments' (ie 10 or more homes) should require affordable housing. The NPPF gives a clear direction that 10% of all new housing (on these major sites) should be for affordable home ownership. Councils will be able to specify the requirement for any remaining affordable homes, provided that at least 10% of ALL of the housing on a given site is for Affordable Home Ownership. The HEDNA emphasises that 'it will be important for the Councils to ensure that any affordable home ownership is sold at a price that is genuinely affordable for the intended target group – for example there is no point in discounting a new market home by 30% if the price still remains above that for which a reasonable home can already be bought in the open market.' (para 8.109).

In terms of the <u>remaining</u> provision of affordable on site which can be viably provided, the HEDNA states that this will need to be down to a range of factors including council priorities and viability evidence.

The Council believes that affordable home ownership should be affordable with the principle that it is intended for those that cannot meet their needs through the open market. The Council will need to consider how this is achieved for the various models including setting local criteria for First Homes (including consideration of whether Key Workers should be included), how it sets the maximum income levels and whether it wants to include a maximum property price for affordable home ownership products. Shared ownership is done through the Help to Buy agent and who assesses whether the applicant can afford home ownership without assistance. Further work will need to be undertaken in this regard, but policy wording will need to be flexible to allow for changing market circumstances and government and local priorities over the plan period.

The current Local Plan percentage requirements for affordable rented and affordable home ownership can absorb the government requirement for 10% of homes to be for affordable home ownership. The new requirement of government for 25% of the overall affordable home proportion (so for our policy – 6.25% of the overall number) to be specifically First Homes can be accommodated within the existing percentage requirements. However, the HEDNA does highlight the importance of maximising the amount of social/affordable rented properties.

We think there is an opportunity to specify in the policy that social rent is the Council's preferred option for the rented proportion of the developer contributions.

Point 7 of the Policy is considered very important to retain the ability to influence the property types and sizes using evidence such as the Homefinder register.

The value areas map is still considered important and relevant (to enable more mixed communities in areas where there is currently a large proportion of affordable homes or conversely, not many affordable homes) and the area categories still seem correct based on the Council's general knowledge of the city, but the map will need updating to ensure it reflects the most up to date position.

An updated viability assessment for the Local Plan will need to be prepared as the Local Plan review work advances , and ensuring an appropriate level of affordable contributions from developers will be key taking all of the previous information to account as well as factoring in a range of other priorities for the Local Plan.

QUESTION 42

We propose that the policy should be updated to reflect the Council's preference for Social Rent as opposed to Affordable Rent. Do you agree

A. Yes – please comment further if you wish
B. No – please explain

The Council believes that affordable home ownership should be affordable with the principle that it is intended for those that cannot meet their needs through the open market. The Council will need to consider how this is achieved for the various models including setting local criteria for First Homes (including consideration of whether Key Workers should be included), how it sets the maximum income levels and whether it wants to include a maximum property price for affordable home ownership products.

QUESTION 43

Do you have any comments on our proposals regarding affordable home ownership? What evidence do you think we should use?

QUESTION 44

Do you have any other comments on the review of Policy H6 Affordable Housing including issues and evidence relating to viability which we need to consider?

Policy H7: Gypsy and Traveller Accommodation

Permanent residential pitch provision

A new Gypsy and Traveller Accommodation Assessment was completed in February 2023. This has shown that the policy needs updating to reflect current circumstances. The GTAA concludes that there are currently 5 authorised pitches on Burbages Lane and an expected supply of 12 pitches following the redevelopment of the Siskin Drive site. This is able to cater for the assessed need (15 pitches) over the short term 2022/23 to 2026/27.

Over the longer plan period to 2041 the GTAA concludes there will be a shortfall of 6 pitches but that these could potentially be accommodated at Burbages Lane.

In order to provide resilience over the plan period the GTAA also recommends a series of requirements which should be taken into account when assessing planning applications and recommends that the criteria in policy are updated to include:

- The site is in a sustainable location in terms of accessibility to services and facilities, including health and schools.
- The site is suitable in terms of vehicular access to the highway, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage and waste disposal.
- Appropriate screening and landscaping is included within the proposal to protect local amenity and the environment.

- The site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains.
- They promote peaceful and integrated co-existence between the site and the local community.
- They enable mixed business and residential accommodation (providing for the live-work lifestyle of Travellers).
- They avoid undue pressure on local infrastructure and services.
- The proposal is well related to the size and location of the site and respects the scale of the nearest settled community.
- Proposals make adequate provision for on-site facilities that meet best practice for modern Traveller site requirements, including play areas, storage, provision for recycling and waste management.

Transit arrangements

In terms of transit arrangements, the GTAA recommends that the Council develops a negotiated stopping policy to help deal with the number of unauthorised encampments which arise at particular times. However, it is our view that this kind of policy sits outside the scope of the Local Plan, unless it would require identifying a particular permanent site, in which case the above provisions would be applied in assessing any such planning application.

QUESTION 45

Do you have any comments on our review of Policy H7, Gypsy and Traveller Accommodation?

Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation

Policy H8 currently deals with the housing needs of an ageing population – and those requiring care - by setting out policy which supports care homes, supported housing, nursing homes and older persons accommodation.

The Housing topic paper sets out how the HEDNA has considered the issue, and then raises a series of additional issues for consideration.

Specialist housing for older and disabled people

Firstly, the HEDNA analysis responds to Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019 and includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).

The data shows in general that Coventry has a younger than average age structure (and higher age-specific rates of disability in a regional/national context). The older person population is
projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:

- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth;

- A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;
- A need for around 1,960 housing units (mainly affordable) with support (sheltered/retirement housing)
- A need for around 230 additional housing units with care
- A need for around 180 dwellings per annum to be for wheelchair users (meeting technical standard M4(3)).

This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Given the evidence, the HEDNA comments that the Council could consider (as a start point) requiring all [new] dwellings (all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and 10%+ of homes meeting M4(3) – wheelchair user dwellings (with a higher proportion in the affordable sector).

Where the authority has nomination rights M4(3) would be wheelchair accessible dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user). It should

however be noted that there will be cases where this may not be possible (e.g. due to viability or site specific circumstances) and so any policy should be applied flexibly.

The HEDNA advises that the Council should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

In seeking M4(2) compliant homes, the Council should also be mindful that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

QUESTION 46

Do you have any comments on the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards)? Please provide evidence to support your views.

It has been suggested that the locational requirements contained within this policy are different to those applied to general housing in policy H3, but a matter for consideration would be whether or not sustainable locational requirements should actually be consistent across all residential dwellings, for example in line with the proposed introduction of the Building for a Healthy Life criteria[5].

In framing policies for the provision of specialist older persons accommodation, the Council will need to consider a range of issues. This will include the different use classes of accommodation (i.e. C2 vs. C3) and requirements for affordable housing contributions (linked to this the viability of provision). There may also be some practical issues to consider, such as the ability of any individual development being mixed tenure given the way care and support services are paid for.

QUESTION 47

Do you have any other comments on our review of Policy H8?

[5] https://www.udg.org.uk/publications/othermanuals/building-healthy-life

Policy H9: Residential Density

Policy H9 sets policy standards for minimum densities which will make the most effective and efficient use of land 'whilst ensuring compatibility with the quality, character and amenity of the surrounding area'. Outside of the ring road (A4053) this is a minimum of 35 dwellings per hectare (dph), inside the ring road a minimum of 200 dph, and greenfield sites 30dph.

Given the government's 'brownfield first' policy, the continued need to use land effectively and the fact that these standards are minimum adopted standards, we think there is an option to conclude that this policy remains up to date.

However, there is also an opportunity to consider whether we could set density minimums outside the ring road in certain locations to maximise capacity.

QUESTION 48

Do you consider:

A. The policy is up to date and sets sufficient standards to maximise capacity already
B. The policy could be amended to increase minimum density levels in certain locations outside the ring road? (please explain and provide evidence where applicable)

Policy H10: Student Accommodation

Policy H10 actively supports Purpose Built Student Accommodation and conversions of residential and non-residential properties where it is directly accessible from the universities, plays a part in regenerating neighbourhoods without disadvantage to local services, will not materially harm the amenities of occupiers of nearby properties and where it will reflect and support or enhance the appearance and character of the area.

Since the plan was adopted, monitoring has shown significant growth in PBSA in the city although this is expected to be a short term peak. Notwithstanding this, the HEDNA does state that the situation should be reviewed as the University's growth ambitions take shape (see Housing Topic Paper), as it has not been possible to quantify levels of need for the future at the present time.

It is important that the universities continue to be supported, they play a key role in the local and regional economy, and PBSA provides an important accommodation for students. Furthermore, PBSA can take the pressure off the need for other forms of student housing such as Homes in Multiple Occupation which come with a different set of challenges and for which a separate Development Plan Document is being developed to help manage the issue.

However, PBSA should not become the predominant form of housing in the city centre. Other types of high density development are much needed to help deliver a range of homes to meet local needs for example co-living, build to rent, and a range of other market and affordable products.

Therefore we think that the wording of the policy should be updated to allow for a more nuanced approach which allows for PBSA to be considered on its merits, and subject to a clear demonstration of need at a particular point in time and whether that need can be met without compromising other aspects of the Local Plan. Consideration needs to be given as to how policy might achieve such an approach using the principles of 'monitor and manage'.

Furthermore, the term used in policy (Part 1a) currently is that PBSA should be 'directly accessible from the universities'. We consider this to be too ambiguous as, for example, this could still encourage remotely located provision should it be 'directly accessible' via a road, bus or rail route. We think it would be better to say 'located within or to the edge of campus' to support sustainably located development.

Because of the increased pressure resulting from the conversions of residential dwellings to HMOs again we think each case needs to be considered on its merits in accordance with the new Homes in Multiple Occupation DPD.

We therefore suggest that the policy could be reworded accordingly:

***1**.Purpose-built student accommodation and conversions of residential and non-residential properties to student accommodation will be considered on their merits. For HMOs proposed conversions will be assessed in line with the HMO DPD. For PBSA applications will be assessed in line with a monitor and manage approach which will consider whether PBSA is helping to deliver a balanced housing market, and where a clear demonstration of need can be shown. If this is accepted applications will be supported where:*

***a.** They are located within a fifteen minute walk time to the edge of the campus*
***b.** Such development can play a part in the regeneration of the immediate neighbourhoods without disadvantage to local services.*
***c.** It will not materially harm the amenities of occupiers of nearby properties; and*
***d.** It will reflect and support or enhance the appearance and character of the area.*

***2.** To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement or other appropriate mechanism.*

QUESTION 49

Do you have any comments on our review of Policy H10?

We are considering a 'monitor and manage' approach to PBSA in Coventry to enable us to recognise the Universities' growth plans and ambitions whilst ensuring that this does not undermine our strategy to achieve a balanced housing market

QUESTION 50

Do you have any comments on a 'monitor and manage' approach, including how this could be implemented, or any alternative ways of managing delivery which can be supported by robust evidence?

We are also considering a range of other matters in terms of ensuring that PBSA meets the needs of its intended residents, that it delivers inclusive, safe and sustainable communities, and that it is well designed having regard to amenity and space standards, sustainable construction (including grey water development, 'living walls' green roofs, space-saving underground recycling facilities and the provision of appropriate facilities (for example a place

to wash and dry laundry, shared and well maintained social space and space for preparing and eating food). We also want to ensure that student accommodation is genuinely affordable and inclusive.

QUESTION 51

Do you have any examples of policy or evidence which would help us develop a policy relating to standards for student accommodation, to include matters of design, amenity, sustainability and mechanisms to ensure that it is truly inclusive for students from all backgrounds including the potential need for developer contributions to secure affordable tenures.

QUESTION 52

Do you have any other issues you think we should be taking into account when planning for student housing

Policy H11 Homes in Multiple Occupation (HMOs)

Coventry City Council is currently developing a new HMO Development Plan Document which will provide new policy for HMOs. At the time of writing this was due to be submitted for examination.

We therefore think there is potentially no future need for this policy. We propose to delete H11 provided that the HMO DPD is adopted. For continuity however we would propose to add a section in to Policy H3 (Provision of new Housing) to ensure that the Local Plan and the HMO DPD are appropriately cross referenced.

QUESTION 53

Do you have any comments on our proposal to delete Policy H11 and instead make sure the Local Plan cross references to the HMO Development Plan document

Chapter 6: Retail and Centres

Preamble - the City's priorities for sustainable centres and addressing climate change

The One Coventry Plan seeks to build on the strength of the City's economy to deliver inclusive growth and work with and support existing businesses to innovate, grow and scale up. The One Coventry Plan is also committed to the city centre and ensuring this is of a high standard offering a diverse range of experiences for residents and visitors. In conjunction with Chapter 4, the Jobs and Economy policies, the Local Plan will promote this corporate approach as part of Chapter 6, Retail and Centres policies, by continuing to promote the vitality and viability of the city's existing centres by supporting commercial and business uses within them, while working within the parameters of Central Government's changes to the use classes order.

The Local Plan's approach and support for retail and centres will address a number of pathways in the Coventry Climate Change Strategy as centres diversify, evolve and adapt to the change in retail patterns and what residents now expect from their centres. This is especially relevant given Central Governments changes to the use classes order. Chapter 6 of the Local Plan will address the low emissions and circular economy pathways as addressing these issues will result in new economic opportunities being created. It will also address the resilient pathway as by reducing the risks of climate change and extreme weather events such as flooding, heatwaves and droughts will allow the city to function more sustainably and more self-sufficiently having a positive impact on businesses and the city's centres.

Planning context

Many changes have taken place within the retailing sector since the adoption of the Local Plan 2017. There is now an opportunity to revise outdated retailing policies to reflect recent changes in this sector.

To aid in in the review of the Local Plan, specialist evidence has been commissioned to help give an up-to-date picture of the current situation. The Retail and Centres study will be divided into two parts. Phase one, commissioned to inform the first stage of the Plan Review, provides a broad overview around a direction of travel in relation to the retail sector, national changes across the sector including online and delivery and future quantum of floorspace and use class provision in Coventry.

Phase two of the study will provide further detail of Coventry's hierarchy of centres. It will also make recommendations in relation to both the hierarchy and wider retailing policy. This will be produced to inform the next stage of the plan making process and will take account of comments received through the Regulation 18 consultation.

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. With effect from 1 September 2020, Classes A and D of the existing Use Classes Order

were revoked and Class B1 was omitted with a new Schedule 2 being brought into effect, providing for new use classes, summarised as follows:

- Class E Commercial, Business and Service
- Class F1 Learning and Non-Residential Institutions
- Class F2 Local Community
- Sui-Generis: "in a class of its own"

The government states that the main driver of this change has been the need to enable a repurposing of buildings on high streets and town centres. The new use classes allow for a mix of uses to reflect changing retail requirements. It will allow a building to be used flexibly by having a number of uses taking place concurrently or by allowing different uses to take place at different times of the day. Changes to another uses, or mix of uses, within this class will not require planning permission.

A Sui Generis use will usually be subject to full local consideration through the planning application process. Although not exhaustive, some examples of Sui-Generis uses are: Drinking establishments, hot food takeaways, live music/performance venues, amusement/gaming/betting shops, fuel stations and car hire/sales.

Overarching Retail Policy approach

Given the changes discussed above, and the increased flexibility around Permitted Development (so there will be much more change which does not need planning permission) we consider that it is more appropriate to base retail policy around the broader categories of Convenience, Comparison and Service.

QUESTION 54

Do you have any comments on our view that removing references to use classes and using the terminology of Convenience, Comparison and Service is appropriate?

With ever changing retail patterns, high street demand and online shopping, the ability to forecast the need for retail floorspace is challenging in the long term. As such, the figures in the current Local Plan are based on a 2014 retail study, informed by the 2011 Census and Coventry City Council Land Use Survey (2013). While it is common for Local Plans to state capacity figures for new retail and leisure floorspace in policies that seek to prioritise new development in town centre locations, such as current Local Plan Policy DS1 (Overall Development Needs), and AAP Policy CC18 ('The Primary Shopping Area'), any figures identified from Stage 2 of the new Retail and Centres Study are likely to show that there is limited capacity for new floorspace.

It is difficult to predict how the retail markets will evolve given the considerable changes that have occurred within a short period of time. Furthermore, the absence of capacity figures will not correlate to a lack of demand from the

market, which the Stage 2 study is expected to identify, particularly within the convenience retail sector where there is strong demand from the sector for new discount foodstores. At this stage it is advised that reference to capacity figures are not stated and should be informed by a holistic overview of the retail context for Coventry by taking account of market led demand within the retail and leisure sectors.

QUESTION 55

We think that references to floorspace figures should be removed to enable a more organic approach to retail development within the defined centres. Do you have any comments on this?

Policy R1: Delivering Retail Growth

This policy defines a series of allocations which include retail within their site, their intended uses and quantum of floorspace.

As discussed above. Part two of the Retail and Centres study will provide detail on the hierarchy of centres within Coventry. It will provide more commentary and make recommendations for any future revisions to the centres hierarchy.

QUESTION 56

Do you think the centres listed in this policy remain fit for purpose and should be retained as allocations within this policy?

We consider that Arena Park Major District Centre has reached a scale of provision which is sufficient for a Major District Centre and any further expansion in this location would not be supported without robust justification. We are mindful that the area is a key tourist attraction and in-order to support that we suggest a minor addition to include tourism in the final paragraph of this policy:

"Further retail provision at Arena Park MDC will not be supported during the plan period unless it is demonstrated that there will be no significant impact on the city centre or that the proposal is an essential element of supporting wider "tourism" and leisure functions."

QUESTION 57

Do you have any comments on a potential change to policy wording to include tourism in relation to the Arena Park Major District Centre?

Policy R2: Coventry City Centre – Development Strategy

The City Centre is at the heart of the retail hierarchy in Coventry. It provides a sub-regional focus for both retailing and culture, leisure and tourism. Policy R2 of the Local Plan sets out the overarching strategy for city centre development and enhancement of the sub-regional centre.

We consider this policy to remain relevant and necessary within the Local Plan but suggest two changes to bring it more up to date.

Firstly, we suggest the addition of a reference to limit the disproportionate concentration of Sui-generis uses within frontages. This is particularly challenging in certain parts of the City Centre, such as the Burgess, where concentrations of SUI generis uses dominate the frontages. This challenge can be mitigated by identifying primary shopping areas, which is discussed later in this section.

Secondly, in light of the on-going review we suggest the removal of part two of this policy which references the development of a City Centre Area Action Plan as the adopted AAP is being reviewed alongside the Local Plan and we are asking for feedback on how to address the matter (See Chapter 14).

QUESTION 58

Do you have any comments on the insertion of a reference to limit the disproportionate concentration of sui-generis uses within frontages?

Policy R3: The Network of Centres

Defined centres play an important role across Coventry. They provide retail and leisure provision to local communities and are often located in some of the most sustainable locations. This policy defines the network of centres across the city. Major District Centres at the top of the hierarchy, followed by District Centres and then Local Centres. Each level of centre provides for different city wide, district and local convenience, comparison and service uses.

Given changes in the use classes order, we propose to amend the final paragraph of part five of this policy (Local Centres) to read …'day to day convenience shopping and proportionate main town centre uses'. This reflects the fact they are local centres and often are of a small scale and serve a local role in the community.

QUESTION 59

Do you have any comments on the proposed changes to the above paragraph?

As part of ongoing work with our consultants we will be re-visiting the hierarchy of centres and considering if the centres currently defined in the Local Plan remain fit for purpose.

QUESTION 60

With the above in mind, do you have any comments on whether the centres listed in this chapter of the Local Plan remain fit for purpose, or should changes to the hierarchy and/or defined centres be made?

Policy R4: Out of Centre Proposals

Paragraph 86 of the National Planning Policy Framework (NPPF) states that polices should define the extent of town centres and Primary Shopping Areas (PSAs). The expectation in national policy that primary and secondary frontages need to be defined in the NPPF was removed in 2018. Although, the National Planning Practice Guidance clarifies that this does not preclude authorities from doing so where their use can be justified. Furthermore, the introduction of an amended Use Class Order now renders policies on primary and secondary frontages difficult to implement, given the flexibility now afforded to commercial activities within this new Use Class.

For the purpose of assessing the sequential and impact tests for retail proposals at locations that are not within a defined centre the NPPF classifies such locations as either being edge of centre or out of centre. Edge of centre is

defined in the NPPF as “a location that is well connected to, and up to 300 metres from, the primary shopping area” (Glossary, NPPF)

Policy R4 of the Local Plan sets out the requirements for assessment of both impact and sequentially preferable sites, should an application for a main town centre use be submitted outside or on the edge of a defined centre.

Part one of this policy states: *Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).*

We consider that this part of the policy should include reference to hot food takeaways and therefore we propose the following wording:

Therefore, we propose that part one of the policy be amended to read: *Proposals for retail, Main Town Centre uses and* ***hot food takeaways*** *(including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).*

In light of the above changes to the NPPF we consider part 2b of the policy should be updated to include Primary Shopping Areas. Therefore, we think that part 2b of this policy should be amended to read:

“Primary Shopping Areas will be identified for the City Centre, Major District Centres and District Centres. The following will apply to the City Centre, Major District Centres and District Centres.

In relation to retail proposals: where in-centre options are exhausted, edge of centre locations (within 300m of a defined Primary Shopping Area) that are well connected and accessible to the centres themselves should be considered in advance of out of centre sites. When considering other main town centre proposals, 300m from a defined centre boundary will be used. Primary Shopping Areas will be defined on the policies map for the City Centre, Major District Centres and District centres.”

“Primary Shopping Areas will not be defined in Local Centres due to their scale. Therefore, when considering edge of centre locations close to local centres, 300m from a defined boundary will be used.”

NB - Part 3a: Impact Assessments, will be reviewed following updated evidence as part of the second phase of retailing evidence.

QUESTION 61

Do you have any comments on whether part one of Policy R4 should include reference to hot food takeaways?

QUESTION 62

Do you have any comments on the creation of primary shopping areas in the City Centre, Major District and District Centres?

QUESTION 63

Do you agree with our suggestion that due to their scale, Local Centres should not have primary shopping areas defined and should use the centre boundary for all elements of sequential assessment?

Policy R5: Retail Frontages and Ground Floor Units in defined centres

When considering uses within the centres hierarchy this is generally focused towards the ground floor of units. As such, the ground floor element of these units is of primary importance as they offer the 'shop windows' for the centre. However, given the use classes order has changed significantly, we consider this policy to be no longer necessary, especially in light of the broad spectrum of uses which can occupy an E class unit without needing planning permission.

QUESTION 64

Do you agree with our suggestion that this policy (Policy R5: Retail Frontages and Ground Floor Units in defined centres) should be deleted?

Policy R6 Restaurants, Bars and Hot Food Takeaways

The Council has pledged to improve its population's health and wellbeing and to reduce health inequalities. One of the challenges the Council faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas. Such uses do, however, have the potential to cause significant problems with impact upon residential amenity, highways and parking. Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere. Where homes are situated above such premises, specific care will need to be given to odour extraction, noise insulation and general public convenience. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

Given changes to the use classes order and the inclusion of restaurants within class E, we no-longer consider it relevant to include restaurants in this policy, as planning controls on the use of a restaurant in a particular unit are limited.

We consider that the term 'normally' in part one of this policy should be removed, in order to remove ambiguity and aide clarity.

We propose that Part C should be slightly amended to refer to the 'adopted' Hot Food Takeaway SPD or any replacement.

QUESTION 65

Do you agree with our proposals for the deletion of 'normally' and to add in 'adopted' where suggested?

We consider reference should be made to the 5 minute walk school exclusion zone. We suggest that the following wording might be helpful:

"Hot food takeaway applications will not be approved if the hot food takeaway falls within a 5 minute walk from the gate(s) of any primary or secondary school (including any Special School, Sixth Form College and Academy), within or outside Local Education Authority Control."

QUESTION 66

Do you have any comments on our suggestion that reference should be made to the 5 minute walk school exclusion zone?

Potential new policy: Local services

The traditional hierarchical approach to town centres, as set by national policy, does not address the importance of local parades of shops and services, nor does it facilitate their protection.

We think this is an extremely important matter however. During the lockdowns of Covid 19 people became increasingly dependent upon walking to their local shop for basic goods and services, and being able to access goods and services locally. Walking and cycling to access a range of local services is extremely important for healthy, balanced and sustainable communities, encouraging social interaction and physical activity and reducing the need for travel by car especially for short journeys. We address this issue in a number of topic areas (health, and communities) and we want to ensure there is policy protection for these smaller parades of shops where there are no alternative easily walkable locations nearby.

We are interested in your views as to how such a policy might work in practice, and where it should sit within a reviewed Local Plan. To aid discussion, we suggest some possible policy wording in relation to Local Parades:

Shops and Parades Outside Defined Centres – possible policy wording

1. Development proposals that enhance the community function of shops and parades located outside centres defined on the Policies Map will be supported.

2. Where it is proposed to change the use of a shop outside a centre, an assessment will be made of its value to the local community. If the shop fulfils a function of benefit to the local community, development proposals must provide credible and robust evidence of an appropriate period of marketing for retail use.

3. Where evidence suggests that a shop does not fulfil a function of benefit for the local community, or

where a community benefit exists to changing to another use, marketing evidence will not be required.

QUESTION 67

Do you have any comments on our proposal? Have you any examples of a policy which protects local shopping parades?

Chapter 7: Communities

Preamble - the City's priorities for communities and addressing climate change

The One Coventry Plan seeks to improve outcomes and tackle inequalities within communities and highlights the challenges of an aging population. To do this the plan recognises the importance of delivering essential services that matter most to the city's communities and supporting health educational and support services. Strengthening the City's Marmot City strategy is also at the heart of the One Coventry Plan's approach to tackle inequalities within communities. While historically Coventry has been one of the youngest cities in the UK with a fast-growing population of young adults aged 18-29, this is expected to change rapidly with 65+ age group expected to become the fastest growing demographic over the next 15 years. As well as being able to draw on the experience and talents of older people, the change in demographic has implications for many services and health and social care services. The Local Plan will support the corporate approach to communities by retaining the policies that protect existing and support new social community facilities.

While the five pathways in Coventry's Climate Change Strategy are in relation to creating a sustainable zero carbon city, the opportunities for enhancing community services and facilities exist within the resilient pathway to ensure the city can better respond to climate change and extreme weather events; and the equitable and people centred pathway to deliver inclusive urban communities and to enhance biodiversity and urban ecosystems within community facilities.

Policy CO1 New or improved social community and leisure premises

In providing social, community and leisure services the NPPF requires local authorities to plan positively for the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so Local Plans should guard against the unnecessary loss of valued facilities and services, allow established facilities to develop and modernise in a sustainable way and ensure that the location of housing, economic uses and community facilities and services are considered and promoted in an integrated way.

This policy sets out a sequential approach to the assessment of such proposals and based on the duration of time this policy has been in place, feedback from stakeholders suggests the policy is helpful and provides a useful way of assessing such proposals allowing sufficient scope and flexibility to make informed decisions.

QUESTION 68

Do you have any comments on our review of Policy CO1?

Policy CO2 Re-Use of or Redevelopment of Facilities

We believe the scope of this policy needs to apply to community uses beyond the current definition of 'community premises'. Some uses (for example pubs which would normally be defined as a main town centre use) might provide a significant social hub for a local community, and a local shopping parade (which sits outside of the traditional

hierarchy of centres) might provide an essential, walkable resource for everyday needs for a community (a matter which became especially significant during the Covid-19 lockdowns). Policy should be flexible enough to enable assets to be recognised in terms of their importance to a local community, and the role they play in reducing reliance upon car-bourne transport. This is especially important with an ageing population, and to support inclusivity and access to services for all.

It is suggested that proposals involving the loss of land in use, or previously in use, by an education facility will only be supported, if it is clearly demonstrated to be surplus to educational requirements and its development for other uses would contribute to improvements in the delivery of school places in the city. Where replacement facilities are intended, they should be located in accessible locations. The quality of new provision should be equivalent to or exceed what is being replaced.

Where premises have been registered with the Council as assets of community value under the Localism Act 2011, it is proposed that this will be a material consideration in the determination of applications for change of use to non-community related use. Feedback from stakeholders and decision makers suggests the policy is helpful and provides a useful way of assessing such proposals allowing sufficient scope and flexibility to make informed decisions.

QUESTION 69

Do you have any comments on our suggestions for amending Policy CO2

Policy CO3 Neighbourhood and Community Planning

Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use. Communities may decide that they could achieve the outcomes they want to see through other planning routes, such as incorporating their proposals for the neighbourhood into the local plan, or through other planning mechanisms such as Local Development Orders and supplementary planning documents or through pre-application consultation on development proposals. Communities and local planning authorities should discuss the different choices communities have to achieving their ambitions for their neighbourhood.
This policy is proposed to be updated in a minor context to bring it up-to-date in respect of the terminology used so that is reflective of the current position as set out in the NPPF (2021) and associated practice guidance (neighbourhood planning).

QUESTION 70

Do you have any comments on our view that Policy CO3 needs a minor update as described?

Chapter 8: Green Belt and Green Environment

Preamble - the City's priorities for the green environment and addressing climate change

The One Coventry Plan recognises the importance of the green environment for improving outcomes and tackling inequalities around the city and in tackling the causes and consequences of climate change. The One Coventry Plan seeks to continue to promote the use of the city's parks and green spaces to help create connections between communities and promote physical activity.

The Coventry Climate Change Strategy recognises that the city has some of the lowest levels of access and use of open spaces, especially in relation to deprived areas, in the region, if not the country. The Equitable and People Centre pathway seeks to create new accessible open spaces in recognition of this fact and also in the effort against climate change which would align with the suggestions for the Local Plan.

Furthermore the Climate change strategy specifically requires the Local Plan to 'further protect and enhance biodiversity'.

Chapter 8 of the local plan would also address the nature based pathway which seeks greater importance to be placed on biodiversity through the planning system with major opportunities sought through the advancement of biodiversity Net Gain for investment in habitat creation and the linking up of areas of biodiversity value with network and wildlife corridors. The strategy also places greater emphasis on improving conservation management of areas of open space. The low emissions pathway will also ensure improved area quality around the city's parks and open spaces.

Policy GB1 Green Belt and Local Green Space

Green Belt policy and Local Greenspace policy are two different types of policy designation both with very high levels of protection.

Green Belt

In terms of the Green Belt the National Planning policy Framework (NPPF) paragraph 138 sets out the Five Purposes of Green Belt:

a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Policy GB1 established the boundaries for the Green Belt including a list of sites which were removed from the Green Belt in order to accommodate the City's growth needs. Much of the policy duplicates national policy and we think we need to ensure the wording is consistent to avoid potential confusion.

Local Green Space

Local Green Space is designated differently to Green Belt. The NPPF (paragraph 102) states that it can only be designated where it is:

a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land

However, the level of protection afforded to local Green Space (once designated) is similar to that of Green Belt land.

We suggest that Green Belt and Local Green Space merit their own individual policies.

QUESTION 71

Do you have any comments regarding Policy GB1?

QUESTION 72

Do you think that Green Belt and Local Green Space should be covered in two separate policies?

Policy GB2: Safeguarded land in the Green Belt

The National Planning Policy Framework 2021 sets (in paragraph 143) out the context for 'safeguarding' land – ie removing it from the Green Belt 'to meet longer-term development needs stretching well beyond the plan period'. In line with Paragraph 143 part d, safeguarding does not allocate the land for development, such an allocation can only be made through the process of plan review, as explained in Policy GE2.

This policy identifies a number of sites stating that they will be 'subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District'.

The explanatory text to Policy GB2 states that the sites in question (Land south of Westwood Heath Road, Land south of Bishop Ullathorne School, Playing Field south of Finham Park School and Land West of Finham Primary School) were safeguarded to ensure flexibility (at that time) to be able to respond to changing circumstances in the Local Plan being developed by Warwick District Council at that time. At the time, they formed part of wider Green Belt parcels which crossed the boundary between Coventry and Warwick District.

Warwick District Local Plan (WDLP) was adopted in September 2017. The implications for the safeguarded land in Coventry is as follows:

- In respect of 'land south of Bishop Ullathorne School', 'playing field south of Finham Park School' and 'land west of Finham Primary School', these all abut land at Kings Hill (Warwick District Local Plan 2011-2029 allocation H43). The Kings Hill site was allocated in the WDLP for housing and taken out of the Green Belt
- In respect of 'land south of Westwood Heath Road' this abuts land that is also safeguarded in the Warwick District Local Plan (policy DS21 – S1 'Land south of Westwood Heath Road). Any decision on whether to allocate this land within Warwick District for housing will be made as part of the South Warwickshire Local Plan that is currently in preparation. This plan is in its early stages of development (it has been through the Regulation 18 'Issues and Options consultation but no decisions have yet been made).

In terms of the future of the safeguarded sites, this will be a matter for Coventry City Council to consider in the light of more detailed evidence on capacity and prioritisation of brownfield sites to deliver on the growth needs of the City, as set out elsewhere in this document, and this evidence will be prepared as the plan progresses to the next stage following the Issues and Options consultation, and in line with cross boundary discussions under the statutory Duty of Co-operate.

QUESTION 73

Do you have any comments of the review of Policy GB2?

Policy GE1 Green Infrastructure

Policy GE1 bases the assessment of, and provision of Green Infrastructure on the most up to date version of the Green Space Strategy. Further detail is provided in the Open Space Supplementary Planning Document which was adopted in March 2022.

However, we think that, linked to the Climate Change and Health agendas (and as set out in the Green Infrastructure and Biodiversity Topic Paper, along with the Climate Change Topic paper and the Health Topic Paper) the policy needs to be strengthened as proposed below.

We think Policy GE1 part 1 should be expanded:

- to cover Woodlands, Veteran trees and Candidate Veteran Trees featuring similar wildlife habitat features.
- to preserve species which are legally protected, in decline, are rare, provide veteran-tree quality wildlife habitat features, such as cavities, holes, significant deadwood, dead bark, rot, fluxes, split limbs, stubs and so on

We propose that Policy GE1 part 2 should identify key corridors for enhancement and to propose targets for connectivity across the city in line with LNRS requirements, and WMCA policy and create new green spaces to enhance biodiversity and improve access to green space.

We think that GE1 part 3 should be expanded to:

- emphasise the importance of green space to health and climate change, as done in the Open Space SPD
- identify key areas with the least green space, and highest levels of health and climate vulnerability, and addressing disparities by creating new green spaces and traffic calming measures like street trees.
- set targets to increasing their canopy and green space coverage, and ANGSt levels and 3-30-300 all in-line with the Urban Forestry Strategy, and broader Urban Nature Recovery Standard, the Urban Greening Factor and the Urban Tree Canopy Cover Standard
- link to natural capital and ecosystem services, for example the impacts of green infrastructure improvements on climate resilience through urban cooling, and flood management, focusing on nature-based solutions to issues like flooding and traffic congestion, with green SuDS
- identify the need to frequently baseline and re-assess biodiversity, green infrastructure and tree canopy cover levels, and enforcement of nature management plus targets needed for the future. Changing the LEMP elements to require proof of long-term monitoring and reporting, this should echo LPA monitoring.

We do not propose any changes to GE1 part 4.

GE1 part 5 should require increases in tree coverage, wildlife-friendly buildings, and new green spaces.

We do not propose any changes to GE1 part 6.

In terms of how we would potentially achieve these proposed changes, the topic paper explains the evidence we would require to set a baseline against which targets would be measured.

In terms of implementing the proposals we suggest that a suite of options could be developed with different types and scales of development. For example one bird/bat/insect box for every dwelling could work as a flexible alternative, or full applications having to achieve the urban greening factor, with 30% green coverage on commercial developments and 40% on residential developments and urban tree canopy cover standards, which we could agree locally, but are normally 30% canopy coverage. To achieve such standards we could provide guidance on methods, using case studies and showing calculations, to make it easy to understand

QUESTION 74

Do you have any comments on our review of Policy GE1: Green Infrastructure?

Policy GE2 Green Space

We consider that the wording of this policy remains valid and do not propose any changes.

QUESTION 75

Do you have any comments on our proposals to retain the above policy with no changes?

Policy GE3 Biodiversity, Geological, landscape and Archaeological Conservation

In terms of biodiversity, the topic paper sets out the changes which have occurred since the adoption of the plan, including the Environment Act 2021, changes to the NPPF and the introduction of Biodiversity Net Gain (to be mandatory at 10% in November 2023)

Whilst changes are still emerging, we think the policy now needs to be brought up to date.
We consider that:

- Part 1a should state a need for at least 10% BNG, including householder applications.
- Part 1d should be amended to read preserve species which are legally protected, in decline, are rare or *provide veteran-tree quality wildlife habitat features, such as cavities, holes, significant deadwood, dead bark, rot, fluxes, split limbs, stubs, etc (re EN SSM). This may include where appropriate BS5837 Category C trees including dying/dead trees*, within Coventry or which are covered by national, regional or local Biodiversity Action Plans.

We propose that Part 2 should identify biodiversity offsetting sites in line with BNG requirements. All areas of priority should be linked to Section 41 (protected) species and habitats and should support the protection of these.

We propose that Part 3 should be expanded to:

- Identify, or reiterate key corridors for enhancement if mentioned in GE1 part 2.
- state the need to create new green spaces to achieve ANGSt standards, and to propose targets for connectivity across the city, following GE1 part 3, to support the Green Space Strategy
- note the important of green features in the built environment, such as additions of green walls/roofs, bee/bird/bat boxes, following GE1 part 5.
- mandate or reiterate increases in tree coverage, wildlife-friendly buildings, and new green spaces if mentioned in GE1 part 5.
- require the continual improvement of blue infrastructure, attempting to achieve good ecological status in all water bodies in key wildlife areas in line with the WFD by a locally agreed date. Any development with negative impacts on water quality should have to contribute Section 106 funding to support these improvements.

QUESTION 76

Do you have any comments on our suggested policy approach to strengthening and updating Policy GE3?

Policy GE4: Tree Protection

Policy GE4 focuses on tree protection and the measures required to mitigate against the impact of trees from development.

We consider that part 1 should be expanded to cover development proposals and general applications including those proposing tree work, with positive consideration being given where:

- there is no unacceptable loss of, or damage to, existing trees or woodlands, including their buffers
- they make a contribution to visual amenity

We propose that the [policy should state that any loss of trees as part of development proposals should be proposed in a tree survey.

We suggest that part 2 should be expanded to state that:

- Certain trees such as Specimen trees, Veteran trees and Ancient Woodland including their buffers, are of such importance and sensitivity as to be major constraints on development or to justify its substantial modification (Re 5837 5.1.1. not paraphrased). Irreplaceable habitats such as those provided by Veteran trees and Ancient Woodlands cannot be replaced or mitigated against (Re PPG 14-1-22 AW).
- Trees that are already subject to protection either as part of an Ancient Woodland (as shown in Appendix 3) or through a Tree Preservation Order or are of TPO quality should be retained for the value they add to the visual amenity of the area, as such development proposals should retain protected trees.
- Development close to ancient woodlands should comprise a buffer of a 30m no-build zone. This zone may include lightweight no-dig construction of suitably designed edge roads within the outer 21-30m. This is to allow for features such as boundary hedge overspill and kerb haunching.
- In exceptional circumstances where the benefits of development are considered to outweigh the benefit of preserving protected trees or trees of TPO quality, development will be permitted subject to adequate compensatory provision being made.
- Tree pits are to be backfilled with peat-free tree planting compost to be incorporated with topsoil from the tree pit in a ratio of 3 parts topsoil to one part tree-planting compost as backfill.

QUESTION 77

Do you have any comments on our review of Policy GE4 Tree protection?

Chapter 9: Design

Preamble - the City's priorities for the green environment and addressing climate change

The Vision and priorities of the One Coventry Plan is to create a city with a strong and resilient economy; where residents get the best possible start in life, experience good health and age well; and where the inequalities are tackled within the city's communities. Also, a city that leads the way and invests in the green industrial revolution; embeds environmentally friendly behaviours and explores opportunities to lessen the pressures caused by climate change. The One Coventry Plan highlights the challenges the city faces regarding the impact of the pandemic, health inequalities and the environment. Chapter 9 of the Local Plan supports the vision and priorities set out with the One Coventry Plan as it recognises that in addition to ensuring good physical design and appearance of new developments, the requirement for high quality design needs to also focus on strengthening approaches to reduce the wider energy impacts of developments; better reflect and address the impacts of an ageing population; reflect the changing requirements and needs of residents following the pandemic such as access to open space and the standard of private amenity space; better address the need to improve health and wellbeing and reduce inequalities; and enhance the biodiversity value of new developments.

The Local Plan recognises there are opportunities within Chapter 9 to strengthen how planning can address the five development pathways in the Coventry Climate Change Strategy. The scope of Chapter 9 means it could be strengthened to ensure developments better address the pathways of lowering emissions; enhancing biodiversity and urban ecosystems; creating more resilience in developments so that they may better respond to the change in climate and extreme weather events as well and have a greater emphasis on way finding and addressing the needs of those who are most vulnerable; and the equitable and people centred pathway to better promote health and wellbeing, allow more residents to better respond to the impacts of climate change themselves and to better respond implement the lessons learnt from the pandemic.

The Climate Change strategy requires the plan review to promote high quality design that promotes active travel (this is also addressed in the Transport chapter). The review of this chapter should be read in conjunction with the Design Topic Paper which provides the context.

Policy DE1: Ensuring High Quality Design

It is considered that existing Local Plan design Policy DE1 still provides a sound basis on which to assess the architecture and design of proposals, however the lessons of the pandemic; the resultant and ongoing economic stresses; the national and local emphasis on improving health and wellbeing and enhancing biodiversity; and the climate change agenda, have highlighted areas where the existing policy could be strengthened to require developments to better address these challenges and contribute to these key priorities.

It is therefore suggested that there should be an ongoing commitment to build a further evidence base to better align the policy with the identified trends listed above, while ensuring the policy stays resolute on requiring developments to incorporate the highest sustainability principles and to promote high quality, varied and innovative architectural approaches that accord with the national design policy direction and which would be coherent with the evolving national building regulations at the later technical design stages.

In accordance with climate change priorities, policy DE1 can play a part in requiring new developments to be resilient and adaptable over their lifetime so that they can best adapt to changing market trends and to ensure better economic sustainability. Part (3) (k) of the policy covers this and is suggested to continue to be supported as currently written. Positive and pro-active principles of adaptability in building design may significantly reduce the wider energy impacts of development proposals and Part (3) (m) is also suggested to continue to be supported as currently written.

It is suggested that Policy DE1 should better address social sustainability principles and better reflect and address the impacts of an increasing aging population. It is suggested that this is achieved by additional points being added to part (3) of the policy requiring all developments to meet the following:

- promote generational community mixing of housing types in developments that include for younger, older and retirement ages; and
- incorporate the outcomes of the Housing our Ageing Population Panel for Innovation (HAPPI) design guidance, which are All Party Parliamentary Group (APPG) publications, where the principles are based on 10 key design criteria. Many are recognisable from good design generally - good light, ventilation, room to move around and good storage - but they have particular relevance to the spectrum of older persons' housing which needs to both offer an attractive alternative to the family home and be able to adapt over time to meet changing needs.

Point 3 (l) of Policy DE1 seeks to promote diversity through a mix of uses within a site, however, it is suggested to introduce an additional point into DE1 that requires all developments to promote a mixture of tenures and accommodation types to support the positive building of neighbourhoods and communities inclusive of tenure blind development, alongside supporting infrastructure – 'integrated neighbourhood principles'. This would be in addition to the generational mix of housing types described above.

It is suggested that Policy DE1 supports the higher standards for housing set out in the housing policies of the Local Plan by requiring developments to comply with the NDSS internal space standards, considering impacts upon viability to ensure housing stock positively meets the needs of users.

It is suggested to add wording into Policy DE1 (3) (b) to promote 'responsive architectural innovation' that encourages developments to advance a new period of the City's legacy of architectural innovation to reinforce Coventry's identity as a city for built environment innovation.

Policy DE1 currently doesn't address high quality design in terms of health and wellbeing and as these are principles of high priority for the Local Plan, it is suggested that additional points are added into (3) seeking for all developments to meet the following:

- provide high quality external amenity space to address the lessons from the Covid pandemic;
- provide public open space catering for the wide range of users and uses whilst encouraging social interaction to deliver positive, distinctive places and locally identifiable space between buildings;
- incorporate the principles of the Building for a Healthy Life toolkit for neighbourhoods, streets, homes and public spaces, a publication written in partnership with Homes England, NHS England and NHS Improvement.

To strengthen the protection of the historical built environment in the policy, it is suggested to include at the end of Part (3) (d), "and for developments in relation to heritage assets and / or in Conservation Areas reference to the Historic England publication 'Streets for All - Advice for highways and public realm works in historic places' should be made."

QUESTION 78

Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)

Chapter 10: Heritage

Preamble - the City's priorities for heritage and conservation and addressing climate change

While the One Coventry Plan doesn't specifically reference heritage issues, it does, as part of the plan's priority to increase the economic prosperity of the city and region, talk about supporting existing business; working to secure new inward investment in the city; marketing Coventry as an attractive place to invest and create new jobs; and ensure a high standard city centre. Heritage plays a part in achieving these priorities and in promoting the city as an attractive place to live, work and invest in. The Local Plan will continue to support the conservation and enhancement of the city's heritage assets through Chapter 10 and will continue to keep the city's built form under review to identify whether any further heritage assets should be allocated and which could promote the corporate approach of the One Coventry Plan.

The relevant draft climate change strategy pathways that the Local Plan would align its Heritage policies with and that would best promote and enhance Heritage assets in the city would be the nature-based and resilient pathways. These pathways have the potential to enhance the city's heritage assets, while at the same time ensuring heritage assets are more resilient to the impacts of climate change and to improve the greening around them and to promote biodiversity and open space.

Historic Environment context

There is separate statutory primary legislation for the Historic Environment contained within the 'Town and Country Planning (Listed Building and Conservation Areas) Act 1990' which provides specific protection for buildings and areas of special architectural or historic interest.

Section 16 of the NPPF deals with 'conserving and enhancing the historic environment'. Paragraph 190 requires the Local Plan process to set out a positive strategy for the conservation and enjoyment of the historic environment and that this is to be achieved through sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation. Consideration should be taken into the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring, including the positive contribution to local character and distinctiveness.

The core historic environment policies within the local plan are policies HE1, HE2 and HE3, and CC2 of Coventry City Centre Area Action Plan (AAP) – 2011-2031

Policy HE1: Conservation Areas

Following the formal adoption of conservation areas in Brownshill Green and Earlsdon, it is suggested to update Policy HE1 in terms of including these two areas in the list of conservation areas in point (1) and removing point (2) which lists proposed areas designated for conservation areas, of which there currently are none.

The Council is not currently in the process of proposing any further conservation area designations, however, it is suggested that a new point (2) should be included stating that areas of the city considered to have special architectural or historic interest or where the character and appearance of an area are of a desirable status to conserve or enhance will be continually review over the plan period to identify whether further areas of the city would warrant conservation area designation.

The approach would need to comply with paragraph 191 of the NPPF which states that when considering the designation of conservation areas, *"local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest."*

A current review of the boundaries of the following Conservation Areas is currently underway with further work needed to be carried out to establish whether suggestions for change will be taken forward by cabinet:

- Allesley;
- Kenilworth Road;
- Stoke Green;
- Greyfriars Green;
- Ivy Farm Lane
- High Street; and
- Spon End.

However, given that section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to review their Conservation Areas from time to time and designate extra areas where appropriate, it is considered appropriate that all conservation areas in the city should be reviewed to confirm their designation and boundaries are still appropriate.

QUESTION 79

Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)

Policy HE2: Conservation and Heritage Assets

It is considered that Policy HE2 still serves its purpose and complies with national policy and guidance and the only update proposed is to include a new point that states "for developments in relation to heritage assets and / or in conservation areas reference to the Historic England publication 'Streets for All - Advice for highways and public realm works in historic places' should be made." We also consider that other Historic England Good Practice guidance should be referenced.

QUESTION 80

Do you have any comments on our review of Policy HE2, Conservation and Heritage Assets?

Policy HE3 Heritage Park – Charterhouse

The aims for the heritage park at Charterhouse and the expansion of the school facilities at bluecoat school are still supported by the Council and are underway. Therefore, this policy is not suggested to require significant changes other than to update the wording with the latest position of the development of the heritage park and emphasising the Council's continued support for it.

QUESTION 81

Do you have any comments on the review of Policy HE3 (Heritage Park – Charterhouse)

Policy HE4 Archaeology

Policy HE2 includes reference for all proposals to conserve archaeological remains of all periods from the earliest prehistoric human habitation to the modern industrial period, however, it is suggested that a separate archaeology policy that more clearly sets out the different archaeological interests that warrant protection and how developments should respond to their significance would be beneficial. This approach would capture Council priorities in one place and consolidate guidance that is spread across different documents. Also, a specific policy could clarify elements of the historic environment, such as the city walls, where some parts are Scheduled whilst other parts are not, but may be of equivalent significance and subject to the same policies under NPPF footnote 68 which states "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets". A specific policy would also allow the alert mechanism for both planners and consultants on the spatial planner, Archaeological Constraint Areas to be mentioned in the Local Plan and for archaeological evaluation to determine archaeological significance of a site to be determined in the early stages of the process.

The inclusion of 'assets of archaeological interest' alongside heritage assets in current policy would go some way to resolve the issue but this is considered to be only a minor fix. A new specific policy would reference what the different archaeological significances are that developments would need to consider and the approach that should be taken for sites within an Archaeological Constraint Area. It could also clarify when desk based or full assessments would be required and include priorities for development proposals that affect archaeological features and deposits and set out that developments will be supported where they are designed to enhance or to better reveal the significance of the asset and will help secure a sustainable future for it. I could also set out that harm to non-designated archaeological remains will be resisted unless convincing justification through public benefit can be demonstrated or mitigation proposed to outweigh that harm.

The new policy will also require developments and archaeological assessments to reference and to take into account the Chartered Institute for Archaeologists (CIfA) standards and guidance and Historic England publications, including the Historic England publication - Coventry City Centre Historic Area Assessment (Hanson *et al* 2020), which provides an improved evidence base for historic assets in the city.

It is also suggested that updating or upgrading the background material for archaeological works is required. This should be in the form of a policy statement, outlining the general requirements and best-practice, working in accordance with Chartered Institute for Archaeologists standards and guidance and the production of generic

Briefs covering the main aspects of archaeological work – desk-based research, intrusive archaeological fieldwork, non-intrusive survey and post-excavation assessment and archiving. The Chartered Institute for Archaeologist recommends that these are produced and although it is not feasible to have a bespoke one for each and every piece of archaeological works, generic Briefs would allow applicants greater certainty on what is required for applications and should raise the quality of archaeological work undertaken in Coventry (including academic and community works). These documents would be part of the wider guidance for the historic environment, similar to that already produced for Heritage Statements - https://www.coventry.gov.uk/heritage-ecology-trees/conservation-areas/6.

QUESTION 82

Do you have any comments on whether a separate archaeological policy would be beneficial (Policy HE4)

Chapter 11: Accessibility

Preamble - the City's priorities for sustainable transport and addressing climate change

The One Coventry Plan's three priorities are to increase the economic prosperity of the city and region; improve outcomes and tackle inequalities within the city's communities; and tackle the causes and consequences of climate change. Chapter 11 of the Local Plan would align and address with these corporate priorities as it seeks to build a strong inclusive economy that reduces transport inequality and makes Coventry a more accessible city for all. The promotion of all forms of public transport to all parts of the city and the delivery of improvements to walking and cycling routes would contribute to the corporate aim of ensuring that residents have access to opportunities no matter where they live.

The approach of the Local Plan in Chapter 11 ensures that the low emissions pathway in the draft Coventry Climate Change Strategy would be addressed which supports the modal shift in transport away from fossil fuels and the further development of new forms of public transport that creates networks for active travel and improving access to facilities by better design. It would also address the resilient pathway in aiding the city to better respond to climate change and extreme weather events.

Furthermore the Climate Change strategy requires the plan review to:

- Promote high quality design that promotes active travel
- Ensure accessibility to public transport and minimise the need for the private motor vehicle

The Council's Coventry Transport Strategy sets out plans to significantly reduce current levels of car travel, including by substantially improving the city's public transport network and by creating a more suitable environment for walking and cycling. The strategy embraces new forms of transport (such as drones and micro-mobility) to reduce the reliance on vehicles for home deliveries and it is accelerating the transition to zero emission vehicles. The strategy also includes improvements to the road network, advocates average speed camera areas and promotes car clubs / car shares and the switch to electric vehicles. The West Midlands Combined Authority (WMCA) is producing a Local Transport Plan (LTP) covering Coventry, which is expected to be published during 2023. This will be supported by the Coventry Transport Strategy

The proposed changes to the local plan set out below are intended to ensure the strategies in the transport strategy can be met. We review each policy in the order it appears in the current adopted Local Plan to avoid confusions but potentially these might be re-ordered in a final version to reflect changed priorities to reflect the Transport Strategy and the need to address climate change.

The transport topic paper provides further context to the review of the transport policies.

Policy AC1: Accessible Transport Network

A Green Paper published in June 2021 makes clear that the refreshed LTP will focus on addressing five 'motivations for change'. These are:

- Tackling the climate emergency
- Reducing transport inequality

- Reducing physical inactivity
- Enhancing local communities & places
- Building a strong inclusive economy.

The Green Paper also makes clear that achieving these goals will require a significant change in travel behaviour, as current levels of car travel are not sustainable. This is also reinforced by WMCA's Climate Change Strategy, *#WM2041*, which sets a target for the region to achieve net zero status by 2041 (nine years earlier than the current national target).

We think that Policy AC1 needs updating in regard to latest guidance and the changes to mainstream and emerging modes of transport as set out below.

We suggest the policy needs to include a reference to the forthcoming Transport Design Guide which will set out the standards that new transport infrastructure (e.g. highways, cycleways, pavements) will be expected to meet. While the Design Guide is currently still in development, it is anticipated that this work will be completed by the time the revised Local Plan is adopted.

Electric vehicles and bicycle hire, which are both referenced as emerging forms of transport, are arguably now mainstream. We therefore suggest these be incorporated into policies AC2 and AC4 respectively, where more detail could be included on the specific expectations for how developers should support these modes.

We recommend that other emerging modes of transport, such as Very Light Rail, Demand Responsive Transport, micro-mobility, Connected Autonomous Vehicles (driverless cars) and drones be referenced in policy AC1 (d).

QUESTION 83

Do you have any comments on the review of Policy AC1 (Accessible Transport Network)

Policy AC2: Road Network

The Government has produced the strategy document – *Taking Charge: The Electric Vehicle Infrastructure Strategy* – which sets out plans to remove access to charging infrastructure as a barrier to the take up of electric vehicles. The strategy envisages that by 2030 recharging will be more convenient than refuelling at a petrol station and that there will be at least 300,000 public charge points in the UK.

The NPPF supports this by pushing councils to enable plug-in and other ultra-low emission vehicles to be charged in safe, accessible and convenient locations. Government statistics show that, while the number of electric vehicles in Coventry is increasing rapidly, they remain a small minority of the total. At the end of 2022 there were approximately 2,800 battery electric vehicles and plug-in hybrid vehicles registered to addresses in the city.

With climate change being a fundamental issue underpinning all policies of the Local Plan review, we suggest policy AC2 is updated with a new separate paragraph on the ways in which developers will be expected to support the provision of electric vehicle charging points along the road network.

Currently, policy AC2 (2) sets out how the Council can secure contributions and the provision of transport infrastructure, such as through S106 agreements, however given the pressing need for increasing electric vehicle infrastructure provision in the city, a separate paragraph on how developers could support this is suggested.

It is also recommended to remove specific reference to the Community Infrastructure Levy in Policy AC2 (2) given the Council's viability exercise has determined that CIL will not be introduced into the city in the foreseeable future. It is proposed that a more generic reference to 'developer contributions' may be appropriate given that the Government has stated its intention to introduce a new 'Infrastructure Levy', further details on this are awaited at the time of writing.

QUESTION 84

Do you have any comments on a mechanism to support the provision of Electric Vehicle Charging Points (EVCP)?

Policy AC3: Demand Management

Evidence suggests that Coventry is currently a city that is largely dominated by car travel with both the total number of cars owned by Coventry residents and the number of cars per household having been increasing steadily over the long-term. Congestion is still common on the parts of the city's road network, while the high volume of car trips also contributes heavily to the city's carbon footprint, creates air pollution and leads to around 600-700 casualties from road traffic accidents every year.

To promote the Council's climate change priorities the parking standards referred to in policy AC3 will be reviewed. It is recommended that the new standards reflect the Council's desire to reduce overall levels of car travel and to promote more sustainable alternatives, such as walking, cycling and public transport, while also recognising that some level of car travel is unavoidable and must still be catered for.

To better reflect the many factors that influence the level of car parking in the city, it is suggested a more nuanced approach is required. Currently the Local Plan only draws a distinction in the level of parking provision that needs to be provided between development that is proposed in the city centre (i.e. within the Ring Road) and elsewhere. However, in practice there are many factors which influence the level of car parking which will be required in a specific development, including the demographic and economic status of residents and the ease with which alternative modes of transport can be accessed.

To reflect the requirement of developments to encourage and incentivise sustainable travel, it is suggested that an additional paragraph be added to the policy in relation to the provision contribution of Mobility Credits (vouchers which residents can use to pay for various forms of sustainable travel) and ways in which developers may be required to support this approach.

QUESTION 85

Do you have any comments on whether parking standards should reflect the strategy to reduce overall levels of car travel and promote more sustainable alternatives ?

QUESTION 86

Do you have any comments on whether parking levels should take into account a range of factors such as the nature of the accommodation, availability of public transport, ease of walking and cycling in the local area etc?

QUESTION 87

Do you have any comments on the mechanism of mobility credits to be secured as part of planning permissions to provide active and sustainable modes of travel and their inclusion in policy AC3?

Policy AC4: Walking and Cycling

The Council's Coventry Transport Strategy sets out plans to significantly reduce current levels of car travel, including by substantially improving the city's public transport network and by creating a more suitable environment for walking and cycling.

The Government has produced the strategy document – G*ear Change: A Bold Vision for Walking and Cycling* – which is focused on bringing about a long-term shift towards active travel. Gear Change includes a specific commitment to ensure that by 2030 half of all journeys in towns and cities will be made by walking and cycling.

The is backed up by the NPPF, which encourages Councils to give priority to pedestrian and cycle movements and provide for attractive and well-designed walking and cycling networks.

Although Coventry is a relatively compact city, the number of people walking and cycling for local journeys is not as high as it could be. While data from the Council's household survey suggests that many residents walk when escorting children to school (42 per cent) or travelling to their own place of education (31 per cent), in 2021 only 9 per cent of commuters travelled to work on foot.

Levels of cycling are particularly low, accounting for only around 1 per cent of journeys into the centre of Coventry and between 1 and 4 per cent of residents' journeys when they are commuting, escorting children to school or traveling to their own place of education. A lack of convenient and safe routes for cyclists is recognised as a barrier to higher levels of uptake. In 2021 only 52 per cent of residents agreed that it was easy to travel around Coventry by bike. This is significantly fewer than the number who felt it was easy to walk, drive and travel on public transport.

The Coventry Transport Strategy is committed to improving this by developing safer and more pleasant routes and environments for both pedestrians and cyclist, by promoting new liveable neighbourhoods, and by further expanding the WM cycle hire scheme. There may also be potential to further expand E-scooter hire, if these are legalised by the national Government.

Given the work needed to better encourage walking and cycling it is suggested that the wording in every part of Policy AC4 is strengthen and better reflect the higher priority which the Council is now placing on promoting walking and cycling (as reflected in the Coventry Transport Strategy and the emerging Climate Change Strategy).

It is also suggested that in the final document the policy be moved higher up the list of the Accessible policies to reflect its importance.

Policy AC4 (2) is recommended to be updated in relation to Quiet Streets to reflect the Council's plans to deliver a wider range of walking and cycling schemes, including high quality, segregated cycleways on key corridors, Liveable Neighbourhoods and School Streets. At present this policy section doesn't set specific requirements, only that measures to control and restrict certain traffic movements and vehicle speeds to create an environment where walking and cycling are the preferred modes of transport, is to be developed.

It is suggested that reference be made in the policy to the Local Cycling and Walking Infrastructure Plan (LCWIP) (currently in development) and set out the Council's expectations for how developers may be required to support schemes contained within it, as well as creating an environment which encourages walking and cycling when designing their schemes.

It is suggested that Policy AC4 (4) be updated to make specific references to the ways in which developers will be expected to support the provision of both cycle parking facilities and cycle hire.

QUESTION 88

Do you agree that strengthening the wording to promote cycling and walking more is the right approach? Please provide comments

Policy AC5: Bus and Rapid Transit

The Government has produced the strategy document – *Bus Back Better* – a new National Bus Strategy aimed at reversing a long-term decline in levels of bus patronage (outside of London). It includes plans to make services more frequent and more reliable, to better integrate services that are operated by different bus companies and to accelerate the rollout of electric buses

The NPPF requires Councils to facilitate access to high quality public transport and to focus significant development in areas where people can travel sustainably.

The city has an extensive bus network, however, there are challenges with the reliability of the services because of an industry wide shortage of drivers, and challenges with the radial nature of the city's bus network, which means many passengers need to travel into the city centre to change buses leading to longer journey times that make bus services uncompetitive compared to travelling by car. Disabled passengers, particularly wheelchair users, have raised concerns about difficulties in accessing services. Passenger numbers have not fully recovered since the pandemic and are typically around 10 – 20 per cent lower than pre-pandemic levels during 2022.

TfWM have recently produced a *Bus Service Improvement Plan*, which sets out plans to improve bus services across the region over the next 5 years, including by transitioning to electric buses, freezing fares and improving ticketing and passenger information.

The Council's Coventry Transport Strategy also sets out plans to significantly reduce current levels of car travel, including by substantially improving the city's public transport network and by embracing new forms of transport (such as drones and micro-mobility) and accelerating the transition to zero emission vehicles. There is a commitment to improve the experience for disabled passengers and passengers with prams and for the first all-electric bus fleet in the country, by 2025, while a city wide 'On Demand' bus service has recently been introduced.

While the Council recognises that improvements to bus services are needed, in terms of the role Policy AC5 can play it is suggested that Policy AC5 (2) - the development of a rapid transit network - be updated to reflect the latest plans for the Very Light Rail system, as this has been established as the Council's preferred way of deliver improvements.

It is also recommended that in the final document the policy be moved higher up the list of the Accessible policies to reflect its higher priority.

QUESTION 89

Do you have any comments on the review of Policy AC5 (Bus and Rapid Transit)?

Policy AC6: Rail

The West Midlands Rail Executive (WMRE) has produced the *Rail Investment Strategy,* which they are currently consulting on and which sets out their priorities for investment in the rail network over the next 30 years.

While the city has good rail links to London and Birmingham and pre-pandemic passenger numbers were increasing steadily across the city's four train stations, local services to Leamington, Kenilworth and Nuneaton currently only run once per hour, while the city has no direct rail links to the East Midlands at all. The Council's Transport Strategy seeks to improve this by seeking to deliver more frequent and direct rail services to Warwickshire and the East Midlands and to explore the potential for additional railway stations.

In addition, passenger numbers have not fully recovered since the pandemic and are typically around 10 – 20 per cent lower than pre-pandemic levels during 2022.

Policy AC6 is still relevant in seeking to achieve the aims listed above and those contained in the Coventry Transport Strategy and doesn't need any updates, but it is recommended to move it higher up the list of the Accessibility policies in the final document to reflect the higher priority which the Council is now placing on promoting public transport.

QUESTION 90

Do you have any comments on the review of Policy AC6 (Rail)?

Policy AC7: Freight

The Government has produced the strategy document – *Future of Freight: A Long-Term Plan* – a further strategy which includes plans to decarbonise the freight industry.

It is suggested that Policy AC7 be updated to strengthen this Government strategy.

It is suggested Policy AC7 (1) be updated to include the requirement for developments with 24-hour operations to provide overnight parking and facilities (such as toilets and showers), to reduce the number of HGVs having to park overnight on roadsides.

It is also suggested that Policy AC7 to include a new paragraph requiring new developments to demonstrate that they can function without requiring HGVs to travel on smaller, residential roads, making specific reference to the Council's forthcoming Future Highway Network Plan, which while currently still in development, is anticipated that it will be completed by the time the revised Local Plan is adopted.

Another new paragraph is recommended to be included which encourages the development of Freight Consolidation Centres, in appropriate edge of city locations close to the strategic road network, to reduce volumes of HGV/LGV traffic within the city. The policy should therefore support these where appropriate.

QUESTION 91

Do you have any comments on the review of Policy AC7 (Freight)?

Chapter 12: Environmental Management, Minerals and Waste

Preamble - the City's priorities for sustainable environmental management and addressing climate change

The One Coventry Plan sets out an approach for a relentless focus on tackling the causes of climate change and mitigating the inevitable consequences of this. Chapter 12 of the Local Plan would align with this corporate approach focusing on planning for climate change and renewable energy generation along with lowering of CO2 emissions and improving housing standards through the strengthening of the Building Regulation policy by requiring an ambitious planning response to the challenges of climate change requirements. The One Coventry Plan recognises that air pollution is a significant problem in Coventry and contributes to poor health, that disproportionately affects the poorest and most vulnerable in the city, further increasing the inequalities in communities. Reducing these inequalities is a priority of the One Coventry Plan. Chapter 12 identifies the city area as an Air Quality Management Area (AQMA) and retains the focus on reducing air quality as well as reducing pollution and the effects of land contamination when developing previously developed land.

Chapter 12 would align with the development pathways in the draft Climate Change Strategy. The Low emissions pathway promotes the generation of power using renewable energy for new developments and existing properties through retrofitting and for transportation with an increase in electrification of both public and private modes of transport. The circular economy pathway seeks to maximise the participation rates in recycling activities from the public and businesses across the City, which would be relevant to the climate change and waste management policies in Chapter 12. The Resilient pathway in the draft climate change strategy is concerned with the city's preparedness for incidents like flooding and other extreme weather events with a focus on sustainable urban drainage systems and planting of vegetation in built up areas to help cool the city and improve air quality, which the policies in Chapter 12 would align with.

The draft Climate Change Strategy requires the Local Plan review to:

- Further promote energy conservation in buildings and the development and use of renewables for energy generation
- Further reduce the risk of flooding and minimise the opportunities for heat gain'

Policy EM1 Planning for Climate Change

We consider that this policy needs updating in terms of bringing it up to date with the approach and direction set out in the COP15 and COP26, NPPF (2021) and, locally, the Councils recently published draft Climate Change Strategy (2023), in order to raise overall standards and work towards achieving net zero in all new homes, with a focus on existing buildings using the fabric first approach. The update will also introduce additional approaches as set out in

the accompanying Climate Change and Sustainability topic paper and will introduce specific targets, where appropriate.
These will also include targets as recommended in the Green Infrastructure and biodiversity topic paper such as mandating levels of canopy cover on major developments and outlining targets for city wide canopy cover which could be based on targets as set out in the existing Open Space SPD.

We think this policy should also proactively promote the benefits of urban living, including high density developments and co living proposals to help in grey water systems with high quality design and the use of advanced methods of construction (including modular build) encouraging more people to choose a lifestyle which helps to address the challenges of climate change.

QUESTION 92

Do you have any comments on the proposed policy direction that Policy EM1 needs updating with the introduction of specific targets for mitigating and addressing the challenges of climate change and working towards achieving net zero in all new build developments?

For non-domestic developments, retrofit, refurbishment and change of use schemes there is scope to achieve net zero for such proposals. The Council will be developing an Adaptation and Resilience Plan for the city but we believe the WMCA Climate Change Adaptation Plan[6] should be considered to address this issue, including SuDS, reducing overheating risk by utilising green roofs/walls and natural shading and to reduce flood risk, alongside adopting renewable technologies to reduce reliance on grid electricity. The Council will also be seeking to encourage and support the development of net zero neighbourhoods and more liveable neighbourhoods designed in response to tackling the causes and consequences of climate change which could include community heat networks, provision for battery storage fed by renewable energy sources, infrastructure to support active travel modes and EV charging and green space, SuDS and trees to provide biodiversity, drainage and shade, alongside opportunities for community food growing.

QUESTION 93

Do you have any comments on the above proposals?

Policy EM2 Building Standards

We consider this policy needs to be deleted and replaced with a new approach to building standards. It is considered that this policy adds little value in its current form in the Coventry context as to how new build developments can be sustainably built in accordance with the approaches set out in the NPPF, Coventry draft Climate Change Strategy and recent updates to national Building Regulations.
A bespoke new policy approach is therefore considered necessary to provide an ambitious planning response to the challenges of climate change and work towards helping achieve international, national and local targets through more challenging building standards.

Based on the recommendations in the Green Infrastructure and biodiversity topic paper, it is suggested the policy could also include mandating the introduction of green walls/roofs, bird, bee and/or bat boxes within new build developments comprising a suite of green features based on different scales of development. The use of SPD could also be required in this regard.

[6] https://www.sustainabilitywestmidlands.org.uk/resources/west-midlands-climate-change-adaptation-plan-2021-2026/

The new building regulations aim to achieve zero CO2 emissions by 2050. They include lowering the maximum CO2 emissions by buildings and raising the bar for current overheating, fabric, and ventilation regulations. The new building regulations are introduced to bring the U.K.'s carbon emissions down to zero by 2050 which will take effect in 2025. The updated rules are a bridge until the Governments Future Homes Standard is implemented, which will bring about stricter adjustments to make buildings more energy efficient.

The National Building Regulations came into effect in June 2022. However, a one-year grace period currently exists. Thus, if projects received Building Regulations permission before June 15, 2022, the old requirements continue to apply. However, developers had until June 15, 2023 to start the work before the approval expired. All newly constructed residences must reduce carbon emissions by at least 31% starting on June 15, 2022. All new non-residential structures must cut carbon emissions by at least 27%.

However, the building regulations will change in 2025 when the Future Homes Standard is implemented which will require all new homes to comply with a stricter standard. Among the requirements, there will be a stipulation that new homes must be "zero carbon ready". CO2 emissions will be 75-80% lower than those built to current standards.

QUESTION 94

Do you have any comments our suggested policy proposals in that Policy EM2 needs to be deleted and replaced with an up-to-date new policy?

QUESTION 95

Do you have any comments on our proposals for setting more ambitious standards for new build developments with the introduction of specific targets that go beyond existing Building Regulations as described above? Please provide detail including what such targets might be, and any evidence to show how these would be viable and deliverable.

Policy EM3 Renewable Energy Generation

In order to support the transition to net zero carbon there will need to be an increase in renewable energy generation and associated infrastructure across the city. Paragraph 152 of the NPPF notes that the planning system should support renewable and low carbon energy and associated infrastructure. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- Provide a positive strategy for energy from these sources that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily.
- Consider identifying areas suitable for renewable and low carbon energy sources and supporting infrastructure.
- Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

Support for community-led initiatives for renewable and low carbon energy should also supported, giving consideration to the role of neighbourhood planning as well as local plans. Footnote 54 of the NPPF notes that in the case of proposed wind energy development involving one or more turbines, these should not be considered acceptable unless they are located in an area identified as suitable for wind energy development in the development plan.

In addition, such applications also need to demonstrate that following consultation, the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing. Further detailed

guidance on developing policies on renewables and low carbon energy and the planning considerations involved in such schemes is provided in the Planning Practice Guidance (PPG). We consider that this policy needs updating in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and, locally, the Councils recently published draft Climate Change Strategy (2023), in order to raise overall standards in the renewable energy sector.

In particular, we believe there may be scope to include some level of mandatory inclusion of renewables in this policy including roof top solar or small scale ground mount such as carports. In addition, we believe decentralised energy networks are critical in this respect when looking at renewable energy and so development proposals of new additional utility networks and enhancements to existing utility networks to enable zero carbon, resource efficient, resilient and adaptable buildings and transport, with appropriate energy supply capacity for expected future demands (both current and new need), will be encouraged across the city. This is required to support achievement of net zero objectives, improve climate resilience, optimise heating/cooling to ensure the delivery of cost effective and sustainable developments.

QUESTION 96

Do you have any comments on our suggestions for updating Policy EM3?

Policy EM4 Flood Risk Management

We consider this policy needs a minor technical update in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and the Councils Local Flood Risk Management Strategy and draft Climate Change Strategy to ensure future levels of flood risk are accounted for. Therefore, specific reference in the policy to acknowledge that current and future impacts of climate change be taken into account and that flood zone 2 be added in part 2 of the policy in addition to flood zone 3. A specific technical update regarding point 2(e) is required to set a minimum threshold figure to account for the 1 in 100 year forecast.

In respect of point 6, it is suggested the exception test be updated to accord with the NPPF.
As per the recommendations set out in the Green Infrastructure and biodiversity topic paper, this could also include strengthening the policy further by including a specific reference to the continual improvement of blue infrastructure as there is a need to achieve good ecological status in all water bodies in key wildlife areas in line with the Water Environment Regulations. Any development with potential negative impacts on water quality could be explored through the legal agreement mechanism and contribute to Section 106 funding to support these improvements.

Expanding on policy using SPD is essential to ensure that there is sufficient breadth and detail to Coventry's overall flood risk management policy. To support and increase the effectiveness of the expansion of wildlife friendly buildings and biodiversity features, a list of preferred biodiversity features in reference to scales of development, and a list of appropriate trees, shrubs for developments to follow, with benefits for pollinators, air pollution, and hay fever, could be explored through new SPD.

QUESTION 97

Do you have any comments on our suggestions that Policy EM4 needs updating as described above with further technical amendments to help strengthen the policy further?

Policy EM5 Sustainable Drainage Systems (SuDS)

We consider this policy needs a minor technical update in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and the latest research and guidance published for successful SuDS. In this regard, we suggest point 2 be updated with specific reference to green roof technology and that refence to SPD in point 5 be removed to allow greater flexibility as to how such guidance be developed.

QUESTION 98

Do you have any comments on our suggestion that Policy EM5 needs updating as described above with further technical amendments to help strengthen the policy further?

Policy EM6 Redevelopment of Previously Developed Land

We consider this policy needs a minor technical update in terms of specific reference Water Environment Regulations which will replace the reference to the Water Framework Directive in part 2.

QUESTION 99

Do you agree with our proposal that Policy EM6 needs updating as described above with further technical amendments to help strengthen the policy further?

Policy EM7 Air Quality

Coventry City Council designated the City area as an air quality management area (AQMA) from 1st November 2009 due to elevated, yearly levels of nitrogen dioxide (NO2). This position has not changed and they policy is considered to be relevant and fit for purpose. Air quality is a material consideration that planners are required to take into account when making their plans and when taking planning decisions. This position is facilitated further by the relatively recent adoption of the Air Quality SPD which sets out how this policy is to be applied and used.

A minor update to the policy is proposed to include a specific reference to the Ministerial Direction for nitrogen dioxide alongside the AQMA to give the policy more weight and bring it up-to-date. In addition, the references to the LETCP are proposed to be removed and replaced with reference to the Air Quality SPD (2019).

QUESTION 100

Do you agree with our suggestion that Policy EM7 needs updating as described above?

Policy EM8 Waste Management

There are no further plans from a waste management perspective to bring forward any sites for the dedicated management of waste in the city. The Mixed Recycling Facility is being developed with an expected completion in summer 2023. The policy is considered to be relevant and fit for purpose. The Councils wider Waste Strategy is still valid, however, officers are of the view not to review and update this until later in 2023 as the Council need to ensure the Governments wider waste strategy be clarified further before a local review is undertaken.

QUESTION 101

Do you agree with our view that Policy EM8 remains up to date?

Policy EM9 Safeguarding Mineral Resources

The continued supply of aggregates and other material, including recycled and secondary materials is required to meet current and future needs of the development and construction industry. Promoting the use of recycled and secondary materials will help to minimise both primary extraction and waste and so is reflected in Policy EM8.

The National Planning Policy Framework requires local planning authorities to define Mineral Safeguarding Areas (or MSAs for short) in Local Plans in order that proven mineral resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked.

MSAs are required to identify what are considered to be economic deposits of mineral. The purpose of MSAs is to ensure that mineral resources are adequately taken into account in all spatial planning decisions. They do not automatically preclude other forms of development taking place, but highlight the presence of economic minerals so that it is considered, and not unknowingly or needlessly sterilised.

In areas where extraction is permitted or is planned, Mineral Consultation Areas will be designated. None are proposed for Coventry during this plan period as there are no anticipated active mineral sites that are being brought forward during the plan period. This has been evidenced through the British Geological Society's Mineral Safeguarding Project, which has been undertaken for the Coventry, Solihull and Warwickshire authorities.

The policy is considered to be relevant and fit for purpose as it accords with the approach set out in the NPPF (2021) and the associated planning practice guidance (minerals).

QUESTION 102

Do you agree with our view that Policy EM9 remains up to date?

Policy EM10 Non Mineral Development I Mineral Safeguarding Areas

The policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.
This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The policy also aims to ensure that development proposals within the plan are deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city.
The policy is considered to be relevant and fit for purpose as it accords with the approach set out in the NPPF (2021) and the associated planning practice guidance (minerals).

QUESTION 103

Do you agree with our view that Policy EM10 remains up to date?

Chapter 13 Connectivity

Preamble - the City's priorities for connectivity, infrastructure and addressing climate change

The priorities of the One Coventry Plan include increasing the economic prosperity of the city and region and improving outcomes and tackling inequalities within communities. The One Coventry Plan seeks to create a city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created. Chapter 13 of the Local Plan supports this corporate approach though the support of internet and telecommunications infrastructure. By ensuring good connectivity of broadband and telecommunications infrastructure, Chapter 13 also supports the Council's corporate approach to reduce inequality and access to opportunities around the city.

The draft climate change strategy aims to lower emissions and make the city more resilient to the affects of climate change and extreme weather events. By promoting improvements to internet and telecommunications infrastructure, Chapter 13 of the Local Plan would support the corporate approach to climate change through improved connectivity.

Context: Internet, Telecommunications and Infrastructure

The NPPF recognises the role of advanced, high quality communications infrastructure in creating sustainable economic growth. The development of high speed broadband technology and other communications networks will also play a vital role in enhancing the provision of local community facilities and services.

Communication infrastructure includes telephone systems (both wired and mobile) and broadband. The benefits of having a modern and accessible system of telecommunications, wireless and electronic methods of communication across Coventry and its surrounding area will be significant both in terms of economic growth, inward investment and sustainable living environments. As such, the city aspires to be a superfast broadband city and wherever possible will look to invest directly in projects to help deliver this aspiration. This is also recognised within the Council's IDP and forms the basis for policy C1.

Policy C1: Broadband and Mobile Internet

We think this policy remains relevant and provides a sufficient basis for the continued provision of suitable broadband and mobile internet provision within Coventry. However, we also consider that it duplicates national policy. Therefore, we consider that the policy may not be needed and could be deleted.

QUESTION 104

Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?

Policy C2: Telecommunications

We think this policy remains relevant and provides a sufficient basis for the continued provision of suitable telecommunications and mobile internet provision within Coventry. However, we also consider the policy duplicates national policy. Therefore, we consider the policy may not be needed and could be deleted.

QUESTION 105

Do you have any comments on our assessment of Policy C12 Telecommunications?

Policy IM1: Developer Contributions for Infrastructure

The Local Plan has been developed alongside continued consultation with the bodies responsible for infrastructure delivery in order to ensure that required infrastructure will be delivered in a timely manner where appropriate. The views of these bodies have been used in testing and underpinning the strategy, although there remain some areas, which will require on-going consultation with the responsible bodies and agencies to identify future, unforeseen needs. This reflects the on-going importance of continuous engagement and monitoring to ensure the Plan is kept up to date and fit for purpose.

We think this policy remains relevant and up to date apart from part four of this policy. Community Infrastructure Levy (CIL) is not used in Coventry and due to proposed national changes in infrastructure charging regimes, we consider that this reference can now be removed from the policy. We feel it is better just to refer to 'developer contributions' in order to be more resilient to any future change by Government.

QUESTION 106

Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any other comments on our review of this policy?

Infrastructure Delivery Plan (IDP)

The adopted Local Plan was supported by an Infrastructure Delivery Plan (IDP) and we will update this to support revised policies as the plan progresses. We include an updated IDP at Appendix 3 which reflects the current situation.

QUESTION 107

Do you have any comments on the updated Infrastructure Delivery Plan at Appendix 3?

Chapter 14: Coventry City Area Action Plan

Context

The City Council adopted an Area Action Plan (AAP) to help guide, inform and consider development proposals within Coventry City Centre. The Area Action Plan sits alongside the Council's Local Plan 2017 but provides greater detail and builds upon the policy basis provided in that document. It guides how the city centre will develop over the next 15-20 years and sets out a number of strategic principles. The document also identifies key areas of regeneration, important heritage assets that must be preserved and areas of opportunity for a range of uses. These include employment, housing, culture, tourism and leisure. As such, the AAP is intended to provide a framework for the transformation of the city centre, whilst ensuring the appropriate level of new residential, office and retail floor space is delivered.

The latest One Coventry Plan seeks to build on the strength of the City's economy to deliver inclusive growth and work with and support existing businesses to innovate, grow and scale up. The One Coventry Plan is also committed to the city centre and ensuring this is of a high standard offering a diverse range of experiences for residents and visitors with the aim of creating a vibrant city centre with increasing visitor numbers.

The proposed approach of the Local Plan review is to still have focused policy on the development and promotion of the city centre, retaining the current allocations and continuing to promote the vitality and viability of the city centre by supporting development opportunities within it to ensure it would align with the council's corporate aims.

The Local Plan Review supports for the ongoing development of the city centre also takes account of all pathways in the draft Climate Change Strategy as the city centre continues to diversify, evolve and adapt to the change in retail patterns and change in focus for the city centre. The low emissions and circular economy pathways would be supported as these pathways emphasis the need to reduce the carbon footprint of both the city's buildings and transport network and provide the opportunities to deliver new economic opportunities. The resilient pathway which seeks to reduce the risks of climate change and extreme weather events such as flooding, heatwaves and droughts will allow the city centre to function more sustainably and more self-sufficiently having a positive impact on businesses and people visiting the city centre. The Plan Review will also support the nature based and equitable and people centred pathways as the Local Plan seeks to improve the conservation management of and increase access to open green space and biodiversity and habitat creation within urban areas, with the draft climate change strategy placing a greater emphasis for the delivery of these initiatives on the city centre.

The redevelopment of Coventry's city centre seeks to enhance the vitality and viability of the city as a whole and flagship developments such as Friargate and City Centre South aim to act as a catalyst for further high-quality development. Such schemes will help build upon the city centre's strengths.

The future of the AAP

Given the changing nature of the city centre and changes in the wider structure of the economy and society across the region and country, and the increasing need to be adaptable, resilient and responsive to rapidly changing circumstances we are seeking views on the role of the AAP.

We are considering options for the best ways of planning for the city centre including whether the AAP remains fit for purpose or whether other mechanisms might be more appropriate, for example masterplans.

QUESTION 108

What are your views on the most effective mechanisms for the future planning of Coventry City Centre? Please provide supporting evidence where relevant.

Appendices

Appendix 1) Call for sites proforma

Appendix 2) Nationally Described Space Standards

Appendix 3) Infrastructure Delivery Plan update

Appendix 4) Glossary

Appendix 1
Call for Sites Assessment Form

1. Your Confidentially Held Details				
Title		**Name**		
Organisation **(if relevant)**			**Representing**	
Address				
Postcode		**Telephone**		
Email				
Date				

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	
Representing (if applicable)	

3. Site Location			
Site Name			
Site address (inc. postcode if known)			
OS Grid Easting		**OS Grid Northing**	
Total Site Area		**Developable Area**	
Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally			

assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line

4. Site ownership (please tick as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No
Other relevant information eg is there a promotion / option agreement, is a developer on board etc				

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)					
Current/previous use					
Adjacent land uses					
Planning History					
Existing Infrastructure	Electricity	Gas	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works					

Ransom Strips / third party land required etc			
Legal Issues			
Existing Occupiers			
Public Access/Rights of Way			
Topography			
Ecology/Wildlife Designations and other known issues	Yes – Details:	Reports/Mitigation Strategy:	No
Trees, hedgerows and woodlands (eg TPOs, other protections and designations)			No
Land Contamination / unexploded ordnance (in areas where this is relevant)	Yes – Details:	Reports/Mitigation Strategy:	No
Heritage Designations (eg listed buildings, conservation areas, local list, archaeology etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Flooding	Yes - details	Reports/Mitigation Strategy:	No
Other Physical Constraints (eg water bodies,	Yes – Details:	Reports/Mitigation Strategy:	No

ditches etc)			
Infrastructure Constraints (eg pylons, gas mains, telecommunications etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Open space and recreation Eg playing pitches, parks and gardens, allotments and orchards etc	Yes - details	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints			

6. Site Accessibility (please provide distance as measured from the middle of the site "as the crow flies" and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)		**Walking time to closest bus stop (mins)**	
Distance to closest amenities (m/km)		**Walking time to closest amenities (mins)**	
Distance to closest rail		**Walking time to closest rail station**	

station (m/km)		**(mins)**	
Any known issues with public transport – frequency of services etc		**Any known issues with amenities eg limited capacity at schools, GPs etc**	
Other accessibility issues relevant to the nature of the proposal			

7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No
If yes, please provide more details and provide copies of reports where available:		
Are there any specific or immediate intentions to start development?	Yes	No
If yes, please provide more details (such as Pre-application discussions)		

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development					
Proposed Land Use	Residential	Employment	Retail	Mixed	Other
Site capacity/density (homes/floor			**Details of mixed/other land uses**		

space)				
Potential Development	For sale/marketed for development	Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)	Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)				

9. Additional information eg relevant evidence, other constraints and challenges, market desirability, planned infrastructure, opportunities etc

10. If the site fits the criteria for a brownfield site are you happy for us to include it on the relevant LPA brownfield land register (tick as appropriate)	
Yes	**No**

11. Would you like to be added to the planning policy consultation database (tick as appropriate)	
Yes	**No**

Privacy Notice

Coventry City Council will use your personal information to fulfil your request to be included on the Planning Policy consultation database and to process any representations and information which you submit to us to help us develop and deliver appropriate planning policy. We will work with the Planning Inspectorate and independent Neighbourhood Plan examiners to provide statutory plan examination services where appropriate.

We will also share information about you with the Planning Inspectorate and Neighbourhood Plan examiners in order to ensure that your representations can be considered at examination and that you can be invited to participate should this be appropriate.

More details about how we use information about you can be found in the full privacy notice, this can be found using the following web address https://www.coventry.gov.uk/planning-policy/planning-policy-consultations/2

Appendix 2

Department for Communities and Local Government

Technical housing standards – nationally described space standard

March 2015
Department for Communities and Local Government

OGL

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Technical housing standards – nationally described space standard

Introduction

1. This standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.
2. The requirements of this standard for bedrooms, storage and internal areas are relevant only in determining compliance with this standard in new dwellings and have no other statutory meaning or use.

Using the space standard

3. The standard Gross Internal Areas set out in Table 1 are organised by storey height to take account of the extra circulation space needed for stairs to upper floors, and deal separately with one storey dwellings (typically flats) and two and three storey dwellings (typically houses).
4. Individual dwelling types are expressed with reference to the number of bedrooms (denoted as ‘b’) and the number of bedspaces (or people) that can be accommodated within these bedrooms (denoted as ‘p’). A three bedroom (3b) home with one double bedroom (providing two bed spaces) and two single bedrooms (each providing one bed space) is therefore described as 3b4p.
5. This allows for different combinations of single and double/twin bedrooms to be reflected in the minimum Gross Internal Area. The breakdown of the minimum Gross Internal Area therefore allows not only for the different combinations of bedroom size, but also for varying amounts of additional living, dining, kitchen and storage space; all of which are related to the potential occupancy.
6. Relating internal space to the number of bedspaces is a means of classification for assessment purposes only when designing new homes and seeking planning approval (if a local authority has adopted the space standard in its Local Plan). It does not imply actual occupancy, or define the minimum for any room in a dwelling to be used for a specific purpose other than in complying with this standard.
7. Minimum floor areas and room widths for bedrooms and minimum floor areas for storage are also an integral part of the space standard. They cannot be used in isolation from other parts of the design standard or removed from it.

8. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls[1] that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m^2).
9. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.

Technical requirements

10. The standard requires that:
    a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
    b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
    c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m^2 and is at least 2.15m wide
    d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m^2
    e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
    f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m^2 within the Gross Internal Area)
    g. any other area that is used solely for storage and has a headroom of 900- 1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
    h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m^2 in a double bedroom and 0.36m^2 in a single bedroom counts towards the built-in storage requirement
    i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

[1] The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls.

Table 1 - Minimum gross internal floor areas and storage (m^2)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

*** Notes (added 19 May 2016):**

1. Built-in storage areas are included within the overall GIAs and include an allowance of 0.5m^2 for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

2. GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with 5 or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA provided that all aspects of the space standard have been met.

3. Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39m^2 to 37m^2, as shown bracketed.

4. Furnished layouts are not required to demonstrate compliance.

Appendix 3

Infrastructure Delivery Plan update (current status)

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Utilities					
City wide	Development of new additional utility networks and enhancements to existing utility networks to enable zero carbon, resource efficient, resilient and adaptable buildings and transport, with appropriate energy supply capacity for expected future demands (both current and new need), across the city.	To support achievement of net zero objectives, improve climate resilience, optimise heating/cooling helping to manage costs	To be determined through procurement process and subsequent business plans	To be determined.	Local Plan Period
Air Quality					
Improvements to air quality across the city will be made in-line with the priorities set out in the Climate Change Strategy and the Local Transport Plan and will be delivered throughout the life of the Local Plan.					
Water and flooding					
City wide	General water supply.	Work with Severn Trent Water to ensure water supply to new developments is identified within their investment programme. This will ensureadequate provision is made for new developments.	Developer, Severn Trent Water (STW) and Environment Agency (EA) if needed. Water Cycle Study evidence base being updated	Presently unknown.	Local Plan Period
City wide	Waste water and sewagefacilities.	Work with STW to ensure waste water and sewage can be adequately dealt with and is identified within their investment programme. This will ensure new developments are adequately managed and supported.	Developer, Severn Trent Water and Environment Agency if needed. Water Cycle Study evidence base being updated	Presently unknown.	Local Plan Period

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
City wide	Flood Prevention programme.	Prevent/mitigate potential issues in the future, and resolve existing issues. To ensure all homes, businessand public spaces are free from flood risk.	Developer, Severn Trent Water and Environment Agency. New strategic Flood Risk Assessment produced. Water Cycle Study evidence base being updated	To resolve existing issues will cost approxima tely between 4million and £5million.	Local Plan Period
Gypsy and Traveller site at Siskin Drive	Management and where appropriate, upgrading of flood alleviation bund.	To prevent flood risk to the site and support on- going maintenance of flood barrier.	Initial funding has already been secured and the bund created. Funding for on-going maintenance is to be reflected within appropriate budgets. Partnership approach with Homes England and EA.	Presently unknown.	Local Plan Period
Stoke Aldermoor	Upgrade to water supply provision and pipe network.	Improvement to overall water distribution, aided by the removal of PressureReducing Valve.	Funding sourced from both EA and STW.	Presently unknown.	Medium term(3-5 years).
City Centre - River Sherbourne	De-culverting the river, especially in the proximityof Fairfax Street.	To support the day lighting of the River Sherbourne within the city centre and promote environmental and economic benefits of this.	Developer contribution s, UK Shared Prosperity Fund (UKSPF), Coventry City Council (CCC) and private investors.	Approximately £40,000 per metre	Across Plan Period

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Broad Lane/Banner Lane; Canley Brook; Upper Brookstray	Flood alleviation measures.	Based on FCERM 6 year programme, review of recent flood events and the high-level identification of potential flood storage locations in the updated SFRA. Essential to ensure that flood risk is not increased in areas where future development and growth is proposed.	Funding sourced exclusively from EA.	Presently unknown.	Short Term (1-2 years).
Lake View Park	Creation of targeted wetland area to promote environmental and flood alleviation improvements.	Promote environmental enhancements and supportwider flood alleviation measures that creates wetlands and riverine restoration.	Funding sourced from both EA and Warwickshire Wildlife Trust (WWT).	£30,000.	Over plan period
Prior Deram Walk and the railway corridor, Canley	Regeneration of local park and green corridor to the south of the railway.	Enhanced quality of provision will help offset loss of lower quality green spaces to support regeneration projects.	Led by CCC with developer contributions and voluntary groups.	Presently unknown.	Medium Term (3-5 years).

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Swanswell Pool and Volgograd Place	Extension of Swanswell Pool and refurbishment of Volgograd Place.	To promote high quality green and blue infrastructure in the city centre.	Charging through developer contributions. In addition to funding contributions from; UK Shared Prosperity Fund (UKSPF), CCC and private investors.	Presently unknown.	Local Plan Period
Sport and recreation					
North West Leisure Facility	Leisure Centre with potential swimming pool, sports hall and strategic sporting offer	North West housing growth	City Council, Public Leisure Operator	TBC	TBC
Brandon Wood Golf Course	Require improvement on golf course and bring back driving bays – wider offer leisure developed	Playing Pitch strategy	City Council	TBC	TBC
Football Hubs – Coundon Hall Park and War memorial Park <u>9v9 grass:</u> NE – 0.5 match sessions City wide – 5 match sessions. <u>5v5 grass:</u> NE – 1 match session City wide – 5 match sessions	Consolidating match pitches and improving the quality of match pitches	Playing Pitch strategy. To address the shortfall of pitches.	City Council, Football Foundation, FA	TBC	TBC

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
3G facilities shortfalls: NW – 2 x 3G pitches SW – 0.5 x 3G pitches SE – 1 x 3G pitches	NW area Cardinal Newman Woodlands Coundon Court SW area Coventry University or alternative SE area Caludon Castle Sports Centre	To meet shortfall	City Council, Football Foundation, FA, schools, clubs	Circa £1m per 3G	2023 onwards
Cricket Wickets shortfall of pitches SE – 24 sessions SW – 24 sessions	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, ECB	TBC	TBC
Rugby Union shortfall of pitches NE area – 14.5 match sessions NW area – 4.75 match sessions SE area – 9.5 match sessions SW area – 12.5 match sessions City wide – 41.25 match sessions	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, RFU	TBC	TBC
Transport					
Future public transport network plan	Development of an integrated public transport network plan for Coventry, responding to factors such as the outcome of bus service network reviews, the outcome of the WM On Demand pilot scheme, network development work for the CVLR, and			N/a	3-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	business cases for new railway stations and services				
Coventry Very Light Rail (CVLR) 'demonstration project'	Development of a short section of track between Coventry Railway Station and Pool Meadow Bus Station to allow CVLR vehicles to be tested in a live environment. This section will eventually form part of Route 1		City Region Sustainable Transport Settlement (CRSTS)	£25-£50m	2 yrs
CVLR Route 1	A first CVLR route, connecting Coventry Railway Station to University Hospital		CRSTS/ Other sources TBC	£100m+	3-5 yrs
Further CVLR routes	Development of a further network of VLR Routes serving various key locations across the city		TBC	£100m+	6-15 yrs
Tile Hill Station improvements	Station improvements aimed at establishing Tile Hill as a transport interchange/Park & Ride site, serving the West side of the city		CRSTS, Partnership with Transport for West Midlands (TfWM)	<£10m	3 yrs
New direct connections to East Midlands	Establishing a direct rail connection between Coventry, Leicester and Nottingham		Midlands Connect / Rail Network Enhancement Pipeline (RNEP)	£100m+	6-15 yrs
More frequent service to Leamington, Kenilworth and	Improvements, including at Coventry Station and some double		Midlands Connect / RNEP	£100m+	6-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Nuneaton	tracking of the line between Coventry and Leamington, to enable an increased service of two trains per hour				
Potential further new railway stations	Potential further new railway stations at Binley & Willenhall, Coundon, Coventry South and/or Foleshill. Further work is required to determine whether some, or all, of these stations would be viable		RNEP, Partnership with TfWM / West Midlands Rail Executive (WMRE)	TBC depending on how many of the 4 potential sites are considered viable	6-15 yrs
Expanded trial of WM On Demand	A wider rollout of the existing WM (West Midlands) On Demand bus services, initially on a trial basis. This would see the service area expand to cover the whole city and the service's operating hours also extended, with potential for merging operations with other similar services such as Ring and Ride		TfWM/ Developer contributions	<£10m	2 yrs
Bus Service Improvement Plan (BSIP)	Delivery of plans set out in TfWM's BSIP, including freezing fares, expanding the use of contactless payments, ensuring tickets can be used across different operators and expanding the use of real time information at bus stops		BSIP, TFWM	£50-100m (WMCA full area)	3 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
All Electric Bus City	All buses operating in the city to be replaced with electric buses		DfT - All Electric Bus City grant (£50m)/ Bus operator contributions, TFWM	> 100m	4 yrs
Ansty Park & Ride	Establishing an, initially bus-based, park and ride service at Ansty as part of the Coventry and Warwickshire CLEAN Hub project (with the potential to add a CVLR service at a later date)		Partnership with Warwickshire County Council (WCC) / Rugby Borough Council (RBC)	£50-100m	3-4 yrs
Local Cycling and Walking Infrastructure Plan (LCWIP)	Development of a more detailed plan of walking and cycling improvements			N/a	3-15 yrs
City Centre Traffic Management Plan	Introduction of further restrictions on car travel within the Ring Road, with the aim of ensuring that the whole city centre is designed primarily as a pedestrian friendly environment		CRSTS	<£10m	2 yrs
Further city centre public realm improvements	Ongoing programme of further public realm improvements in the city centre		TBC – potential for developer contributions	Ongoing programme	2-5 yrs
Local centre improvements	Ongoing programme of improvements to various local centres around the city, including public realm improvements and better walking, cycling and public transport connectivity		TBC – potential for CRSTS and developer contributions	Ongoing programme	2-5 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Ring Road junction remodelling	Remodelling of various Ring Road junctions	To remove congestion & improve pedestrian & cycle access in and out of the city centre	Programme/ Developer contributions	£25-£50m	4-5 yrs
Coundon and Binley cycleways	Completion of two fully segregated cycleways, connecting the city centre to Coundon and Binley		Coundon – Local Air Quality Action Plan (LAQAP) Binley - Transforming Cities Fund (TCF)/ Active Travel Fund (ATF)	<£10m each	1-2 yrs
University of Warwick cycle routes	Improved cycle connections between the University of Warwick and neighbouring residential areas, railways stations and the city centre		ATF/ Developer contributions/ Sustrans	<£10m	2 yrs
Foleshill Transport Package	The package includes segregated cycle facilities on Foleshill Road, as well as junction improvements on the A444 (to accommodate traffic displaced from Foleshill Road)	Package of improvements to reduce the level of through traffic on Foleshill Road and encourage greater levels of active travel.	CRSTS	<£10m	2-3 yrs
Coventry South/ London Road Transport Package	Various improvements on the London Road corridor, including remodelling of key junctions and the installation of segregated facilities for cyclists		CRSTS/ Developer contributions	£10-£25m	2-3 yrs
Eastern Green cycleways	Two new cycleways connecting the planned Sustainable Urban Extension (SUE) at Eastern Green to the city centre and to Tile Hill Railway Station		Developer contributions	<£10m	2-4 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Keresley Connects cycleways	New cycleways connecting the planned SUE in Keresley to the city centre and to Allesley/ Lyons Park		Developer contributions	<£10m	2-4 yrs
Further cycle network improvements	Ongoing programme to develop and deliver further cycleways, informed by the LCWIP.		ATF/ Developer contributions	Ongoing programme	3-15 yrs
Liveable Neighbourhoods	Development of two initial Liveable Neighbourhoods, in collaboration with local residents		ATF	<£10m	1 yr
Further programme of Liveable Neighbourhoods and School Streets	Ongoing, community-led programme to establish further Liveable Neighbourhoods and School Streets		TBC	Ongoing programme	1-15 yrs
WM Cycle Hire	Ongoing expansion of the existing WM Cycle Hire scheme, with the aim of covering the whole city		TfWM	Ongoing programme	1-15 yrs
E-scooter rental scheme	Expansion and roll-out of the existing pilot scheme. Further actions dependent on national changes to legislation expected in 2023/24 subject to parliamentary timetable		TfWM	TBC	1-15 yrs
Updated Parking Strategy	Review of the Council's existing Parking Strategy			N/a	2-15 yrs
Transport Design Guide	Design guide for new transport infrastructure associated with development but also applying to Council schemes			N/a	2-15 yrs
Future highway network plan	Development of a more detailed planned of the			N/a	3-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	city's future public transport network				
A46 Binley Junction improvements	Complete installation of a flyover at the A46 Binley Junction (currently underway)		National Highways	£50-100m	1 yr
A46 Stoneleigh Junction improvements	Complete upgrades to the A46 Stoneleigh Junction (currently underway)		WCC	£25-50m	1 yr
LAQAP highways schemes	Complete various highway improvement schemes aimed at reducing air pollution at several pinch points, including Spon End, Ring Road Junction 7 and the Holyhead Road area (currently underway)			£25-50m	1-2 yrs
Keresley Link Road	A new connection through the planned Keresley SUE, linking Long Lane in the West of Coventry and Winding House Lane in the North. This will also remove through traffic from existing residential areas in NW Coventry			£10-£25m	3-4 yrs
A46 Walsgrave Junction improvements	Planned junction upgrade to improve journey times on a key strategic route		National Highways	£50-£100m	3-5 yrs
A46 Strategic Link Road	A new strategic link between the A46 South of Coventry (at Stoneleigh Junction) and either Solihull or the West of Coventry.	This would create a new travel corridor linking the North Warwickshire/South Coventry with UK Central Plus (including the new HS2 station) in Solihull	Partnership with WCC and Solihull Metropolitan Borough Council (SMBC)	£100m+	6-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
M6 Junction 3 improvements	Improvements to reduce congestion at a key junction		National Highways	£25-£50m	6-15 yrs
Highway maintenance programmes	Ongoing programme of work to maintain our highways, cycleways and footways according to identified prioritisation based on condition and other factors		CRSTS	Ongoing programme	1-15 yrs
Road safety programmes	Annual programme of road safety improvement schemes based on casualty reduction priorities		CRSTS	Ongoing programme	1-15 yrs
Average speed cameras	Ongoing programme to reduce vehicle speeds within the city.	Rolling out average speed camera enforcement, with the aim of installing these on all major radial routes into and out of the city according to a prioritised programme	CRSTS	Ongoing programme	1-15 yrs
5G monitoring/ Connected Autonomous Vehicles (CAV) Testbed	Various projects aimed at preparing our highway network for the future	Includes testing of CAVs and the rollout of 5G monitoring and other projects involving trialling and rollout of new transport technology	TfWM/ Commercial/ Government research funding e.g. Innovate UK	Ongoing programme	1-15 yrs
Electric Vehicle (EV) Charging Infrastructure Strategy	Development of a more detailed plan to expand the city's electric vehicle charging infrastructure		N/a	Office of Zero Emission Vehicles (OZEV)	3-15 yrs
Local EV charging hubs	Programme of EV charging/ multi-modal transport hubs in various locations around the city		Ongoing programme		2-15 yrs
Decarbonisation of the taxi fleet	Transition the taxi fleet operating in the city to zero emission vehicles in line with the		N/a	Partnership with the private sector	3-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	Council's taxi licensing policy				
Coventry and Warwickshire CLEAN Hub	Creation of a multi-modal transport interchange initially with electric vehicle charging facilities and park and ride services, with further features to be added later		£50-100m	Partnership with the private sector	3-4 yrs
Trial of dynamic charging of electric vehicles	Development of "wireless" charging allowing EVs to be charged on the move.		<£10m	Partnership with the private sector	5 yrs
Green Innovation Park	Creation of a 'super charging hub' for electric vehicles		£10-£25m	OZEV	5 yrs
Public electric vehicle charge points network expansion	Ongoing programme to expand the city's network of public electric vehicle charge points		Ongoing programme	National Highways / CCC	1-15 yrs
E-Fleet - Try Before You Buy electric vehicle scheme	Ongoing operation of the Council's Try Before You Buy electric vehicle scheme for local businesses utilising electric vehicles purchased for the Council's own fleet		Ongoing programme	Private sector	1-15 yrs
Expansion of car clubs/ car sharing services	Ongoing work with commercial partners to expand the provision of car clubs/ car sharing in the city, and encourage the provision of more shared electric vehicles		Ongoing programme		1-15 yrs
City centre freight consolidation centre review	Consider options to establish freight consolidation centre(s) as part of the wider redevelopment of Coventry city centre. Further		<£10m	Partnership with public, private and academic sectors	1-2 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	actions will depend on the outcome of the review				
Project Skyway	Investigation of the potential for drones to undertake longer distance deliveries along pre-determined corridors		£50-100m	Partnership with WCC	2-3 yrs
Ansty freight consolidation centre	Establishing a freight consolidation centre in Ansty as part of the Coventry and Warwickshire CLEAN Hub project		TBC	Partnership with TfWM and private sector	5-15 yrs
Last Mile Freight** * Timescales for this project are still to be determined	Investigation of potential for parcel lockers, drone delivery and other innovative solutions to last mile deliveries building on the Urban Air Port demonstrator project				
Mobility Credits vehicle scrappage scheme trial		Completion of an initial pilot of a vehicle scrappage scheme, where participants receive credits in exchange for scrapping an older, heavily polluting vehicle	<£10m	TfWM	1 yrs
Mobility Credits incentive scheme trial	Further pilot scheme where residents moving into newly completed homes in Keresley and Eastern Green	Mobility Credits to encourage them to travel by sustainable means	<£10m	Developer contributions	2-15 yrs
Travel Demand Management	Ongoing programme of activity to promote and encourage sustainable travel choices		Ongoing programme	TfWM	1-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Education					
Engagement with schools and businesses	Ongoing programme of engagement with local schools and businesses to help them to encourage and support residents to travel to school/work via sustainable modes, including the development of an Employer / Business Network to share and implement best practice on sustainable travel initiatives		Ongoing programme		1-15 yrs
Regular community events	Ongoing programme including, for example, cycle training and community cycling events		Ongoing programme		1-15 yrs
New primary school at Bannerbrook	Site already secured, funding relates to the delivery of actual school buildings. To support a 2FE primary school.	To accommodate the increase in demand driven by recent developments as well as new site proposals as Eastern Greenand Cromwell Lane.	Charging through Section 106 agreements, and funding from EFA.	£5 million for Banner Brook Primary School, excluding the cost of site provision.	Land returned to Developer due to larger parcel of land secured at Eastern Green
Little Heath PrimarySchool	Additional school places tomeet potential increased demand. Additional placesgenerated by converting school from 1 form entry to2 form entry.	Acetate development of 400homes generating the need for primary school places.	Charging through Section 106 agreements, and funding from EFA.	£2.2 million.	Project Completed in 2014 Funding to be given in instalments, but to be completed no later than 2018.

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Whitmore Park Primary School	Provision of new primary school places. Additionalplaces generated by converting school from 2 form entry to 3 form entry.	To meet increased demand in local catchment. Charging through Section 106 agreements, and funding from EFA.	Charging through Section 106 agreemen ts, and funding from EFA.	£1.25 million.	Project Completed in 2015
New primary school at New Century Park	Provision of new primary school to meet increased demand. New 2FE primary school with supporting land.	To respond to increased demand as part of recent developments at New Stoke Village and New Century Park.	Charging through Section 106 agreements, and funding from EFA.	£5 million for New Century Park Primary School plus land provision.	Land returned to Developer due to local birth rate
New Secondary School for North and West to provide additional spaces and respond to need.	Existing need for north west Coventry has been identified as 1 form entry required in 2017, 2018, 2019, and 2020. Increasing to 8 form entry by 2021.	To meet increased demand in local catchment.	Charging through Section 106 agreements, and funding from EFA.	North West Coventry - approximately £7.5 million, excluding the cost of site provision.	Additional School Places being provided through expansions at existing schools rather than new School
New Secondary School for South and East to provide additional spaces and respond to need.	Existing need for south east Coventry has been identified as 1 form entry in 2019 and 2020. Increasing to 3 form entry by 2021.	To meet increased demandin local catchment.	Charging through Section 106 agreements, and funding from EFA.	South East Coventry – approximately £12.5 million.	Additional School Places being provided through expansions at existing schools rather than new School
The former Alice Steven's site adjacent toWhitley Abbey Primary School	Primary Broad Spectrum Special School.	To meet the needs of children with SEND. Provision of forms of school management programme to make more efficient use of resources and better	Charging through Section 106 agreemen ts, and funding	Approximately £10 million.	Project Completed in 2016

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
		deliver services.	from developer contributi ons.		
President Kennedy school	New 6th form building to include general teaching classrooms for 20 students each and science teaching space - New build 6th form located on playing fields. Reconfiguration of 2 football pitches and relocation of MUGA.	Due to rising demand for school places and within the One Strategic Plan for Education, a form of entry (FE) is being added to the school.	Charging through Section 106 agreements, and funding from DfE.	£7,000,000	Completed in 2021
Coundon Court	New build teaching block, extension to existing Hall, car park relocation and extension.	Due to rising demand for school places and within the One Strategic Plan for Education, 2 forms of entry (FE) are being added to the school.	Charging through Section 106 agreements, and funding from DfE.	£7,000,000	Completed in 2021
Cardinal Newman	Construction of a new dining hall, additional teaching space. Two temporary modular units required.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£6,000,000	Completed in 2021
Barr's Hill	New teaching block / hub. Internal refurbishments to changing room and gym block refurbishment. External works.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£10,000,000	Completed in 2022

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Sidney Stringer	The project requirements are to refurbish the ground, first and second floor Swanswell building by creating a double story hall and refurbishment of existing offices and music room.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£500,000	Completed in 2022
Lyng Hall	4 classroom block, dining area expansion to provide increased internal dining and extension of sports hall.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023
Stoke Park	Refurbishment classrooms and changing rooms. External landscaping and pitch enhancement.	Due to rising demand for school places and within the One strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed by 2023
Ernesford Grange	To expand Ernesford Grange & the co-located Riverbank Academy by 1 form of entry for an additional 150 pupils and SEN expansion for an additional 36 pupils.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£9,000,000	Completed in 2022

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Riverbank		To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	£9,000,000	Completed in 2021
Finham	Expansion of school's physical capacity to accommodate a permanent increase of 30 pupils from September 2021 - an organic growth of 150 pupils over a five-year period. New provision of additional canteen space, six additional classrooms, exam room space and associated ancillary space	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£6,000,000	Completed in 2022
Bishop Ullathorne	Provision of New Sports Hall on school site	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£3,000,000	Completed by 2023
Finham 2	Refurbish Edwards Keep to form new classrooms and changing facilities, update the current DT Workshop into a new food technology space, refurbish the existing science classroom in to a	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	STEM classroom and expand the sports facilities to create a new Muga that has previous planning approval.				
Westwood	Temporary accommodation for September 2021: changing space (split for girls and boys) and 2 x general teaching classrooms Refurbishment of existing DT classroom (complete) (to create 2 x general teaching classrooms), refurbishment of existing Art classroom (to create 2 x general teaching classrooms) September 2023 permanent changing space (new standalone block)."	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed by 2023
Sherbourne	Internal refurbishment of the school and the creation of new school buildings for the use of Secondary age pupils	To meet the needs of SEND. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed in 2020
Baginton (Rebuild)	A potential project to rebuild and expand Baginton Special School to accommodate additional	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	pupils.	programme to make more efficient use of resources and better deliver services.			
Woodlands	SEMH Woodfield's schools currently across 2 sites with buildings that have been deemed unsuitable for purpose in the long-term. There is an opportunity to use the site formally occupied by Woodlands School. This site contains listed buildings and successfully provides community sports use. The project is to enable the integration of the Primary and Secondary schools onto one site and continue to provide the community sport provision. It is proposed to dispose of the Primary and Secondary site for development to provide funding for the main scheme."	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	To be finalized with contractor undertaking work	Completed by 2024

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Foxford	The reprovision of school buildings to provide additional school capacity	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2022
Cardinal Wiseman	"3 modular classrooms and extension of existing classroom to create science room (external extension with internal refurbishment). The school may wish to extend across the full width of the building and will be provided prices to confirm if they wish to proceed at their costs.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed by 2023
Blue Coat	Initial discussions with school indicate that the works will comprise the following element - Provision of new single story sixth form block (6 classrooms) for September 2023	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023
The Link	2 Storey extension and refurbishment of existing facility to provide additional pupil places for 2022. The existing	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£5,000,000	Completed in 2022

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	building is to be refurbished.				
Keresley SUE New School	Due to new housing in the local area, land has been secured for a 2FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, an new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027
Eastern Green New School	Due to new housing in the local area, land has been secured for a 3FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, an new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2030
Health Infrastructure					
New health centre at Foleshill	New health facilities.	To provide new high qualitypremises to support health provisions within the area.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Boards.	Cost to be determined as scheme specific details emerge.	TBC
New health centre at Keresley SUE	New health facilities.	To provide new high quality premises to support the needs of a new community.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Board	Cost to be determined as schemespecific details emerge.	TBC

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Expansion of existinghealth services at Walsgrave	Expansion of existing health facilities.	To ensure accessibility to high quality health care facilities for both present residents of Coventry and those that will reside in new developments.	Charging through Section 106 agreemen ts and Section 278 agreements. Funding from the NHS and ICB.	Cost to be determined as scheme specific details emerge.	Across Developmen t Plan Period
Cross Boundary Infrastructure					
Through the Duty to Cooperate the City Council will work with its Warwickshire neighbours to identify key cross boundary infrastructure in Warwickshire that have a close or direct relationship with Coventry and the delivery or facilitation of its wider housing and employment needs.					

Appendix 4 – Glossary

AAP - Area Action Plan
A Development Plan Document which focuses upon a specific location or an area subject to significant change.

Affordable Housing
Housing, including social rented and intermediate housing, for people whose needs are not met by the housing market.

AMR - Annual Monitoring Report
Report published once a year by local planning authorities or regional planning bodies assessing progress with and the effectiveness of policies.

AQMA - Air Quality Management Areas
Designation made by Local Authority where assessment of air quality requires action plan to improve the air quality.

Article 4 Direction
A direction under Article 4(2) of the General Development Order, which may require approval by the Secretary of State, bringing under the control of the local planning authority any specified developments normally permitted under the Town and Country Planning (General Permitted Development) Order 2015.

Biodiversity
The innumerable and diverse species of animals, plants and other living things in a particular area, and the wide range of urban and rural habitats where they live.

Biodiversity Action Plan
A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

BNG - Biodiversity Net Gain
An approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.

Brownfield Land
Previously developed land occupied by a permanent structure and associated development, such as car parking, which can be re-developed for other uses.

Build to Rent
Purpose built housing that is typically 100% rented out. It can form part of a wider multi tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development

Coventry Local Plan 2011-2031
The existing statutory land use Plan for the city which the Local Plan will supersede. It comprises the policies against which proposals for physical development are currently evaluated and provides the framework for change and development in the city.

CIL - Community Infrastructure Levy
A levy placed on development, to fund new or additional infrastructure needs.

Circular
Non statutory advice and guidance on particular issues which expands and clarifies subjects which are referred to in national legislation.

Climate Change Strategy 2023-2030 – A Green Future for a Changing City
The Council's strategy, part of the One Coventry Plan 2022-2030, focusing on pathways to address sustainability and climate change issues to ensure future economic growth as well as helping to address the inequalities of residents.

Comparison Shopping
Items not bought on an everyday basis, but after comparison of alternatives from various sources such as clothes, shoes and electrical items.

Conservation Area (CA)
Area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

Convenience Goods
Items bought on an everyday basis such as food-shopping.

CPO - Compulsory Purchase Order
An order issued by the government or a local authority to acquire land or buildings for public interest purposes. (e.g. Land for new roads).

Central Shopping Area
The main retail area within the city centre. It meets the convenience and comparison shopping needs of the city's population and also acts as a sub-regional retail centre to some degree. It contains local needs shops, national comparison multiples and a range of small independent specialist shops.

Coventry and Warwickshire Local Enterprise Partnership (CWLEP)
Local Enterprise Partnerships are locally-owned partnerships between local authorities and businesses and play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. They are also a key vehicle in delivering Government objectives for economic growth and decentralisation, whilst also providing a means for local authorities to work together with business in order to quicken the economic recovery.

Density
In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Development
Development is defined under the Town and Country Planning Act 1990 as "the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land".

District Centre
Significant group of shops serving a large part of the city including both comparison and convenience shopping, as well as other commercial and public services and facilities.

Development Plan Document
One of a family of documents which sets out the land allocations and spatial planning policies for all or specific parts of the local authority area. When approved or adopted, DPDs will form part of the Development Plan. Some DPDs may refer to areas outside a local authority boundary as there may be issues of shared interest with other local authorities.

Edge of centre
The definition in the NPPF states: that for retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

GPDO - General Permitted Development Order
The Town and Country Planning (General Permitted Development) (England)Order 2015 (as amended) grants rights (known as permitted development rights) to carry out certain limited forms of development without the need to make an application for planning permission

Green Belt
National policy designation that helps to contain development, protect the countryside and promote brownfield development and assists in the urban renaissance. There is a general presumption against inappropriate development in the Green Belt.

Greenfield
An open green area of land that is undeveloped

Gypsy and traveller site
Site for settled occupation, temporary stopping place or transit for gypsies and travellers.

HELAA – Housing and Economic Land Availability Assessment
Replaces the Strategic Housing Land Availability Assessment (SHLAA) and is an assessment which seeks to identify land which is suitable, available and achievable for housing and economic development, which acts as an evidence base for the Local Plan.

HEDNA – Housing and Economic Development Needs Assessment
Replaces the Strategic Housing Market Assessment (SHMA) and is a joint and integrated assessment of the need for housing, economic growth potential and employment land with the HMA.

Heritage asset
A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest, including statutory and local listings.

HIA – Health Impact Assessment
A combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.

Housing Association
Independent, non-profit association that provides rented or shared ownership (intermediate) housing to people unable to afford to buy their own homes on the open market, or to specific groups, such as older people or the homeless.

HMA - Housing Market Area
Provides information on the level of need and demand for housing and the opportunities that exist to meet it across a defined area.

HMO – Housing in Multiple Occupation
Shared dwelling houses permanently occupied by members of more than one household of unrelated adults as their only or main residence, who share basic amenities such as a kitchen or bathroom. Changes of use from C3 residential to smaller 3-6 person HMOs (C4) are permitted by the GPDO. Planning permission is required where an HMO caters for 7 or more unrelated adults.

Listed Building
A building of special architectural or historic interest included on a statutory list. Listed Building Consent is required for their demolition or alteration to any part of the building and this applies equally to the interior as well as exterior.

Locally listed buildings
The Council maintains a list of buildings of local architectural or historic interest which it believes are worthy of conservation. Local listing brings with it no additional planning controls but is a material consideration when planning applications are considered.

Local Biodiversity Action Plan
This outlines how landowners, land-managers and policy makers will protect the characteristic wildlife and landscapes of an area.

Local Development Document
This includes two types of documents: Development Plan Documents (DPD), and Supplementary Planning Documents (SPD).

Local Development Order
Enables specified development or use/s of land and buildings that would normally need planning permission to go ahead without planning permission. Essentially extends 'permitted development' but only to the extent specified in the Order.

Local Green Space
Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.

Local Plan
It comprises the policies against which proposals for physical development will be evaluated and provides the framework for change and development in the city.

Local Transport Plan
Local Authority Transport strategy.

LPA – Local Planning Authority
The public authority (The Counicl) whose duty it is to carry the planning function for the plan area (the administrative boundary of the City of Coventry.

Main Town Centre Uses
Uses as defined by the NPPF consisting of retail, commercial and community uses.

Major Development
10 or more (gross) residential units or developments of 1,000 sq ms or more of non-residential floorspace. When referencing this term consideration should be given to the definition contained within the Town and Country Planning Act (unless otherwise stated within the Plan(s).

Marmot City
An evidence based strategy to address the social determinants of health, the conditions in which people are born, grow, live, work and age and which can lead to health inequalities. The City Council will use it to improve the health, wellbeing and life chances of the people of Coventry.

Neighbourhood Plan
A statutory plan prepared by a parish council or neighbourhood forum, in line with the Local Plan that introduces non-strategic planning policies in a designated neighbourhood area.

NPPF - National Planning Policy Framework
Government's planning policies.

One Coventry Plan
Sets out the Council's vision and priorities for the city, with three interconnected priorities and two key enablers for improving the life and residents and reducing inequalities.

Out of centre
A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Policies Map
A geographical representation of policies contained in the Local Plan.

Previously Developed Land
See Brownfield.

Planning Obligation
Legal agreements between a planning authority and a developer to ensure that certain works which are necessary and relevant to a development are undertaken or financial contributions made to facilitate associated infrastructure works and development.

Planning Policy Guidance
Government detailed guidance and interpretation on the policies set out in the NPPF.

Primary Shopping Area
Defined area where retail development is concentrated.

SA - Sustainability Appraisal
Appraisal to assess whether proposed plans and policies meet sustainable development objectives, and is mandatory under the Planning and Compulsory Purchase Act 2004. The aim is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of new or revised Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) and includes assessment of social and economic inputs, in addition to environmental inputs.

S106 - Section 106 Agreement
Section 106 of the Town and Country Planning Act 1990 allows a local planning authority to enter into a legally-binding agreement or planning obligation with a landowner in association with the granting of planning permission.

Sequential Approach
Planning principle that seeks to identify, allocate or develop certain types of locations of land before others.

SSSI - Sites of Special Scientific Interest

An area of land identified and protected by Natural England as being of special nature conservation interest nationally.

Supplementary Planning Document
These are LDD documents (Local Development Document) that provides further detail of policies and proposals in a 'parent' Development Plan Document. Not subject to external scrutiny and without the status of DPDs, but are a material consideration in the evaluation of planning applications. They will replace Supplementary Planning Guidance (SPGs).

SuDS - Sustainable Drainage Systems
Absorb rainfall and release it gradually, improving drainage and reducing the risk of flash flooding.

Sustainable Development
Development that meets the needs of the present, without compromising the ability of future generations to meet their own needs.

Sustainable Transport
Modes of transport which are less damaging to the environment than cars including public transport, walking and cycling.

TPO - Tree Preservation Order
An order made by a local planning authority in respect of trees or woodlands to prohibit the cutting down, uprooting, topping, lopping, wilful damage, or wilful destruction of trees without the LPA's consent.

Town Centres
Defined area on the Policies Map where retail, commercial and community development is concentrated and where main town centre uses will be encouraged. References to town centres apply to city centres, town centres, district centres and local centres

Very Light Rail
A research and development project, using the latest automotive expertise in the region to develop an innovative track design and vehicle, and deliver an affordable light rail system, for Coventry and beyond.

Viability Appraisal
An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements that can be provided.

Windfall Site
Site not specifically allocated for development in a Development Plan, but which unexpectedly becomes available for development during the lifetime of a plan.

Other

Use Classes Order

The Town and Country Planning (Use Classes) Order 1987 (amended) puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same Use Class. The Government's Planning Portal set out the Use Classes as follows:

Class B

- **B2 General industrial -** Use for industrial process other than one falling within class E(g) *(previously class B1)* (excluding incineration purposes, chemical treatment or landfill or hazardous waste)
- **B8 Storage or distribution -** This class includes open air storage.

Class C

- **C1 Hotels -** Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels)
- **C2 Residential institutions -** Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres

- **C2A Secure Residential Institution** - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks
- **C3 Dwellinghouses -** This class is formed of three parts
    - C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child
    - C3(b) covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems
    - C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger
- **C4 Houses in multiple occupation** - Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom

Class E

In 11 parts, Class E more broadly covers uses previously defined in the revoked Classes A1/2/3, B1, D1(a-b) and 'indoor sport' from D2(e):

- **E(a)** Display or retail sale of goods, other than hot food
- **E(b)** Sale of food and drink for consumption (mostly) on the premises
- **E(c)** Provision of:
    - **E(c)(i)** Financial services,
    - **E(c)(ii)** Professional services (other than health or medical services), or
    - **E(c)(iii)** Other appropriate services in a commercial, business or service locality
- **E(d)** Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)
- **E(e)** Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- **E(f)** Creche, day nursery or day centre (not including a residential use)
- **E(g)** Uses which can be carried out in a residential area without detriment to its amenity:
    - **E(g)(i)** Offices to carry out any operational or administrative functions,
    - **E(g)(ii)** Research and development of products or processes
    - **E(g)(iii)** Industrial processes

Class F

In two main parts, Class F covers uses previously defined in the revoked classes D1, 'outdoor sport', 'swimming pools' and 'skating rinks' from D2(e), as well as newly defined local community uses.

- **F1 Learning and non-residential institutions –** Use (not including residential use) defined in 7 parts:
    - **F1(a)** Provision of education
    - **F1(b)** Display of works of art (otherwise than for sale or hire)
    - **F1(c)** Museums
    - **F1(d)** Public libraries or public reading rooms
    - **F1(e)** Public halls or exhibition halls
    - **F1(f)** Public worship or religious instruction (or in connection with such use)
    - **F1(g)** Law courts
- **F2 Local community –** Use as defined in 4 parts:
    - **F2(a)** Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres
    - **F2(b)** Halls or meeting places for the principal use of the local community
    - **F2(c)** Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
    - **F2(d)** Indoor or outdoor swimming pools or skating rinks

Sui Generis

A use, which is not within any specific Use Class and for which any change of use, will require planning permission. Certain uses are specifically defined and excluded from classification by legislation, and therefore become 'sui generis'. Other uses become 'sui generis' where they fall outside the defined limits of any other use class. For example, C4 (Houses in multiple occupation) is limited to houses with no more than six residents. Therefore, houses in multiple occupation with more than six residents become a 'sui generis' use.

Coventry City Council

Coventry Local Plan Review 2021-2041 Issues & Options Regulation 18 Consultation

Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) Initial SA Report

May 2023

enfusion

Coventry Local Plan Review 2021-2041: Issues & Options Regulation 18 Consultation

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

Initial SA Report:

date:	May 2023 v1 Draft May 2023 v2 Final	
prepared for:	Coventry City Council	
prepared by:	Barbara Carroll	Enfusion
quality assurance:	Barbara Carroll	Enfusion

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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 Local Plan Review (CLPR, 2021-2041). This summary is an integral part of the Initial SA Report that accompanies the draft Issues & Options plan for Regulation 18 public consultation in summer 2023. It provides an outline of the SA process and findings in non-technical summary.

The Coventry Local Plan Review (CLPR) 2021-2041

2. The Coventry Local Plan 2021-2041 covers the entire administrative boundary for Coventry City Council, extending beyond the city centre, and located some 15 km to the south-east of Birmingham. Since the current Local Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including major changes to climate change and environmental requirements. The longer term effects of Brexit and the Covid pandemic are still uncertain, for example, on patterns of working.

3. It is anticipated that many of the current policies will need only minor amendment. However, some 20-30 policies will need significant updating to address the new requirements and to accommodate the predicted increasing population and the needs for new development. The Regulation 18 Issues & Options draft Plan comprises 15 chapters. Each chapter covers a topic that sets out the issues, lists the policies, discusses the options, makes suggestions, and invites comments to questions.

Sustainability Appraisal (SA)

4. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social, and economic considerations in the preparation of a Local Plan. 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.

5. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, and by identifying issues, problems and opportunities. From this information, a SA Framework of objectives for sustainable development is prepared. This is relevant to the Coventry local authority area and the issues for the Local Plan review, and it then forms the basis against which the draft plan is assessed.

Sustainability Characteristics of the Coventry City Area & Likely Evolution without the Local Plan Review

6. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042 and, in line with the rest of England, there are more people in older age groups. Over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background. Whilst there have been improvements, there are pockets of deprivation and poor health/wellbeing in parts of the area and this limits people's opportunities to succeed in life.

7. Much of Coventry's housing stock is small, old and not to modern energy efficiency standards. This means that many residents are living in damp, poorly insulated homes, and pay too much to keep warm. Migration is another factor for the housing needs. Before the pandemic, Coventry had experienced strong economic growth with particular skills in advanced manufacturing and engineering, but there have been challenges since brexit and Covid-19. Tourism is also important, and the city is home to two successful universities.

8. The city has air quality problems, mostly associated with pollution from vehicles. Noise is a common problem – also from transport, and also light – for both people and wildlife. Pollution from wastewater remains a problem for water quality. Most of the new development completed has been on previously developed land, thus protecting agricultural land and greenfield. The city centre is generally well connected, including for sustainable transport but could be further improved to better encourage more active travel and linkages with green ways for cycling and walking.

9. Coventry has a range of unique historic sites and features that give the area its distinctive characters and cultural identity. The landscapes in the area are valued for their scenic qualities, rich wildlife, cultural associations and historic values. Although Coventry is mainly a built environment habitats, there are nationally designated sites for scientific interest, local nature reserves, and areas of ancient woodland. The area is also rich in the water environment with rivers, canals and waterbodies that form an important biodiversity network.

10. Without review of the Local Plan, there are likely to be some changes in sustainability characteristics of the Coventry area, for example, the increasing use of electric cars, and new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, and some recovery for the loss of nature and biodiversity.

11. However, the predicted increase in population, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens, and to be able to provide the right mix and type of homes in the most suitable locations. Without guidance from an updated Local Plan, the adverse effects from development, including cumulative effects, would not be managed effectively. Opportunities from new development, such as

improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

How has the Coventry Local Plan Review been assessed?

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

SA Objective
SA No 1: To enable vibrant and inclusive communities
SA No 2: To provide accessible essential services and facilities for all residents
SA No 3: To improve health and promote active living
SA No 4: To provide decent and affordable housing for all
SA No 5: To support sustainable inclusive economic growth
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions
SA No 7: To build resilience to climate change
SA No 8: To reduce traffic & improve sustainable transport choices
SA No 9: To reduce air, noise & light pollution
SA No 10: To protect & conserve natural resources - soil, water, minerals & waste
SA No 11: To protect and enhance nature & biodiversity
SA No 12: To protect and enhance the historic environment, and its setting
SA No 13: To protect and enhance the quality and character of townscapes and landscapes

13. The significance of effects was assessed using the categories, as follows:

Symbol	Meaning
- -	Major Negative
-	Minor Negative
+	Minor Positive
++	Major Positive
?	Uncertain
0	Neutral or Negligible

What reasonable alternatives have been considered & addressed?

14. During the progression of technical studies and early development of issues and options for plan-making, certain strategic options were identified for topics, as follows:

    - Amount of housing
    - Density of Housing
    - Climate Change & Standards for Building Regulations
    - Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI)

15. These strategic options were tested with high level appraisal through SA using the SA framework of objectives and in a comparable and consistent manner. The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. It should be noted that there can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.

Initial Findings of the SA

16. The population of Coventry is predicted to increase and the Council is investigating 3 alternative calculations for how much housing and new development will be needed. Good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental. Planning for the housing needs will have positive effects for all 3 options for objectives on housing, communities, and health. However, the higher amounts of housing are likely to be difficult to accommodate due to the land constraints in Coventry. Homes might need to be small, more densely located and thus less able to meet the variety and adaptability of needs.

17. The higher amounts of calculated housing were found to have likely negative effects on SA objectives for sustainable transport, natural resources of soil and water, nature and biodiversity, and townscapes/landscapes. Whilst there is uncertainty of the significance of such negative effects, it was found to be unlikely that the Coventry area could absorb such changes with the higher levels of new development. Possibilities for mitigating such negative effects are limited and there would be considerable pressures on the open and green spaces in the city that are so important for healthy urban environments.

18. The Council is investigating possibilities for increasing the density of residential development outside the ring road in certain locations where this might be suitable and sustainable. The SA found that for the densities in adopted policy, there is likely negative effects on soils and water resources since it is uncertain whether there is sufficient previously developed land to meet with the higher figures, and on biodiversity. The SA found that consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained

and with such importance for protecting spaces for green and blue infrastructure, and for improving biodiversity.

19. The Council is investigating the implications for increasing the requirements for Building Standards over and above that required by Government so that the plan may further support Coventry's Climate Change Strategy. The SA found considerable uncertainty but overall, such higher standards would be likely to have more positive effects for SA objectives on climate change, health, economic growth, and a healthier urban environment.

20. The importance of green spaces in the city is understood and therefore, the Council is investigating possibilities for increasing the standards for green infrastructure and biodiversity net gain over and above those required by Government. The SA found that such an approach would likely have more positive effects for many SA objectives, including health, climate change, reducing pollution, conserving soils and water resources, enhancing nature, and the quality and character of townscapes and landscapes.

21. Overall, the SA found that the higher levels of development were likely to have negative effects particularly through pressures on sustainable transport, and the open and green spaces in the city that are so important for people's health and active living, soil and water resources, and for building resilience to climate change. All these factors are interconnected and contribute to helping Coventry achieve its ambitions for addressing the climate crisis and supporting the One Coventry Vision.

Consultation & Next Steps

22. This Initial SA Report is being published alongside the Issues & Options draft Coventry Local Plan Review for Regulation 18 consultation. Any comments on the SA will be taken into consideration at the next stage of the draft plan review preparation – Pre-Submission draft CLPR for Regulation 19 consultation anticipated for late 2023/early 2024 (to be confirmed).

23. The Council will review and analyse the representations made on the Regulation 18 consultation. These comments will be taken into account, together with further technical studies, so that a preferred approach to the review of the plan can be prepared. This emerging further draft of the CLPR will be subject to SA to inform plan-making and the findings of the SA will be presented within a SA Report that will accompany the draft CLPR on Regulation 19 consultation.

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[1].

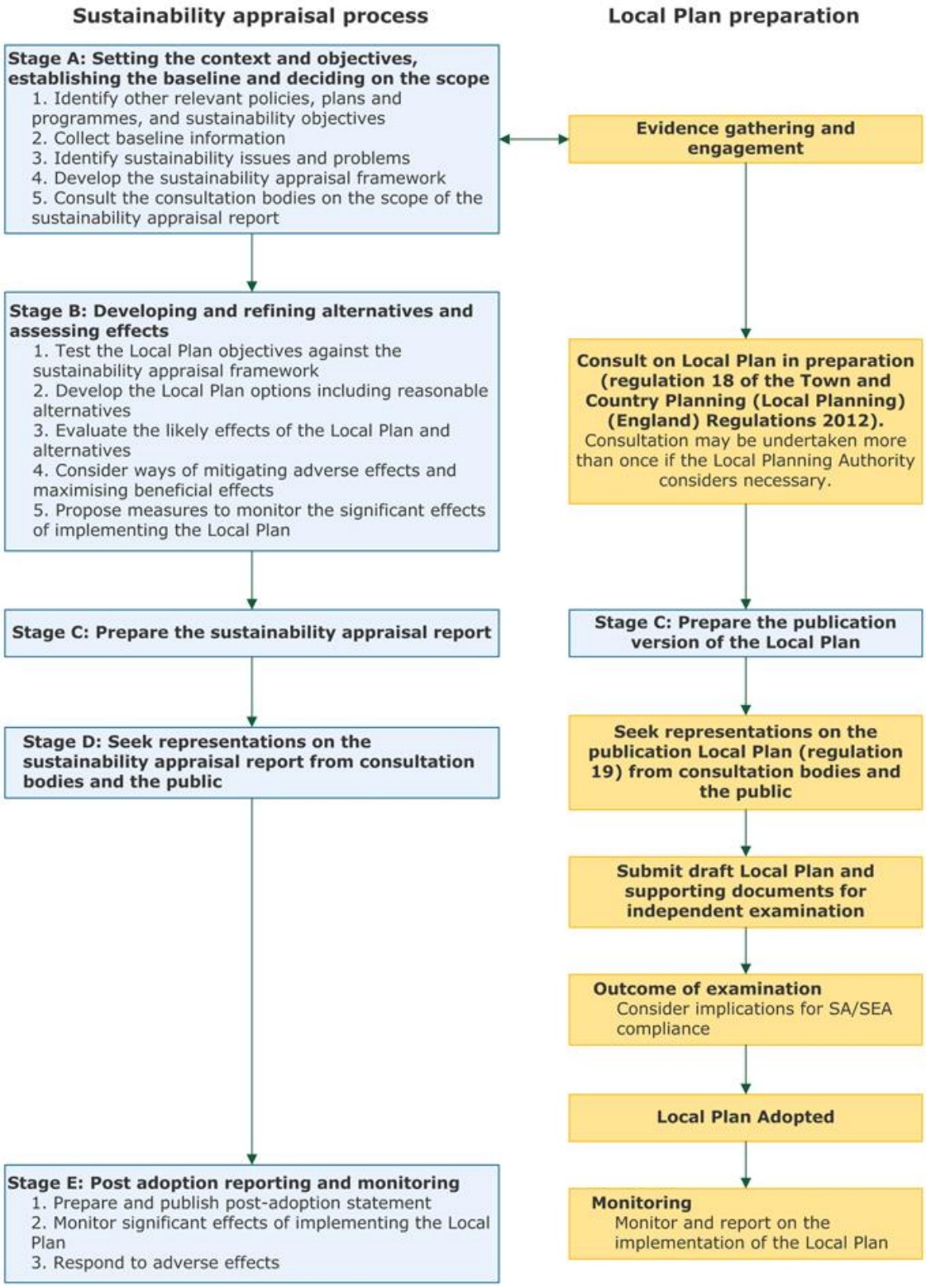
1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF, updated 2021)[2]. SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004[3]. Coventry City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Coventry Local Plan Review CLPR 2021 - 2041.

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. 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 This SA Report explains the Stage A Scoping that has been undertaken and sent to the statutory consultation bodies in accordance with good practice. It reports the initial findings of Stage B Alternatives & Assessment and comprises in part Stage C Preparation of the SA Report. This Initial SA Report accompanies the Coventry Local Plan Review Issues & Options Regulation 18 Draft Plan for statutory public consultation and seeks comments from the public, stakeholders and the statutory consultees.

[1] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal
[2] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[3] https://www.legislation.gov.uk/uksi/2004/1633/contents/made

Figure 1.1: SA and Plan-making Stages and Tasks



Habitats Regulations Assessment (HRA)

1.5 Coventry City Council is also required to undertake a Habitats Regulations Assessment (HRA)[4] of the Local Plan Review.[5] The Conservation of Habitats & Species Regulations (2017, amended 2018)[6] afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar[7] sites. It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site.

1.6 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. HRA screening for the CLPR will be undertaken separately and the findings of the HRA screening (and any appropriate assessment) will be taken into account in the next stage of the SA.

The Coventry Local Plan Review 2021-2041 (CLPR)

1.7 The Coventry Local Plan 2011-2031 and City Centre Area Action Plan 2011-2031(CCAAP) (both adopted 2017), together with national planning guidance (NPPF, updated 2021), Development Plan Documents (DPDs), Supplementary Planning Guidance (SPDs), and Neighbourhood Plans (NPs), comprise the planning framework through which decisions are made on planning applications.

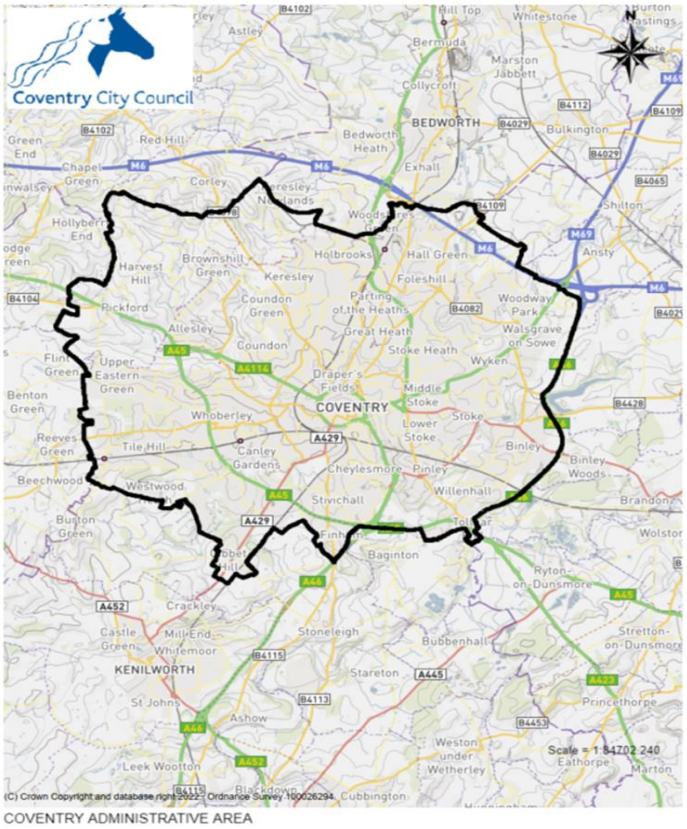
1.8 It may be noted that the review of the CLP is being carried out during a time of proposed planning reform and these changes could have a profound impacts on plans and projects. During 2020-2021, Government consulted on proposed changes to the planning system with planning for the future, revisions to the NPPF and the National Model Design Code. These consultations included the changes to the standard method for assessing local housing need. The Levelling-up & Regeneration Bill[8] (consultation December 2022 – March 2023) sought views on Government's proposed approach to updating the NPPF, and to preparing National Development Management Policies. At the time of preparing this Initial SA Report, the outcomes of the consultation process were not yet known.

1.9 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^2 located in central England,

[4] https://www.gov.uk/guidance/appropriate-assessment
[5] https://www.gov.uk/guidance/appropriate-assessment
[6] https://www.legislation.gov.uk/uksi/2017/1012/contents/made
[7] Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance
[8] https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy

approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa – and as shown in the following figure.

Figure 1.2: Location of the Coventry Local Plan area



1.10 In consideration of the significant changes associated with Government calculations for housing need, as well as major changes to climate change and environmental requirements, the Council approved a full review of the Local Plan in December 2022. Since the Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including effects of Brexit and the Covid pandemic. The Council decided that it was more effective to undertake a full rather than a partial review.

1.11 It is anticipated that many of the extant policies will only need minor amendment or updating. Around 20-30 key policy areas have been investigated with updated evidence, most notably associated with the new Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022)[9]. This strategic study has been prepared to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs for the city and the county.

[9] https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/3

1.12 The studies for the preparation of the Local Plan Review identified certain different strategic options for policies. These were determined to be reasonable alternatives such that they were investigated through the SA process. Strategic options were identified for the quantum of housing development, the density of housing, standards for Building Regulations, and standards for Biodiversity Net Gain (BNG) and Green Infrastructure (GI).

1.13 The draft Issues & Options Plan published for Regulation 18 consultation has considered the updated evidence, reviewed the extant policies, and explored the issues and options arising. The draft Plan aligns with the contents of the adopted CLP for ease of understanding the issues, options and implications for updating. It comprises 15 chapters supported by appendices, as follows:

1 Introduction
2 Health & Wellbeing
3 Review of the Overall Levels of Growth & the Duty to Co-operate
4 Jobs & Economy
5 Housing
6 Retail & Centres
7 Communities
8 Green Belt & Green Environment
9 Design
10 Heritage
11 Accessibility
12 Environmental Management, Minerals & Waste
13 Connectivity
14 Infrastructure – updates
15 Coventry City Area Action Plan

1.14 Each chapter presents the relevant evidence, explains the issues associated with the topic, suggests realistic options that could be progressed, and asks questions of consultees to inform decision-making and the further development of the Local Plan. It is important to note that the draft plan is not a new local plan – it is a review – and as such, seeks to be proportionate and to focus on those areas that need updating. It focuses on strategic matters as these are likely to have the most impacts. In particular, the issues and options for the review are framed within the context of changed national requirements, the Council's One Coventry Plan (2022-2030)[10], and the five development pathways to sustainability set out in the draft Coventry Climate Change Strategy (2022-2030 – consultation draft)[11].

1.15 The next stage of plan preparation will take into account the consultation responses and ongoing technical studies. This further draft plan will comprise those policies that required none or only minor amendment, and those policies that have been significantly reviewed and updated. The draft Plan will be subject to SA before its Regulation 19 consultation.

[10] https://www.coventry.gov.uk/onecoventryplan
[11] https://www.coventry.gov.uk/draftclimatechangestrategy

Purpose and Structure of this Initial SA Report

1.16 This document reports the initial assessment stage of the SA process for the Coventry Local Plan Review. Following this introductory Section 1, this report is structured into further sections:

- Sections 2 explains the approach to the SA, including consideration of reasonable alternatives, the SA Framework and methods
- Section 3 summarises the sustainability context and baseline characteristics with details available in the SA Scoping Report (March 2023)
- Section 4 summaries the findings of the SA of the Strategic Options
- Section 5 sets out the requirements for consultation and commenting on the report, and explains the next steps

1.17 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 Framework for assessment. Appendix III details the SA of the Strategic Options.

2.0 APPROACH & METHODS

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 (2021) in paragraph 35b that states that evidence should be proportionate. Planning guidance advises[12] that the SA should focus on what is 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 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 Local Plan area and relevant for a Local Plan Review were identified. The details of this analysis are presented in the SA Scoping Report (March 2023 and as Appendix II of this Initial SA Report) and a summary is provided in the following Section 3 of this SA Report.

2.4 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, evaluated and any options compared. SA objectives have been identified through the SA scoping process from the information collated in the policy context, baseline analysis, identification of sustainability issues and opportunities, and consultation with the statutory bodies. Each SA objective was further clarified through a number of decision-aiding criteria/questions to aid the appraisal process.

2.5 The SA Framework is, as follows:

[12] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

Table 2.1 SA Framework

SA Objective	Decision-aiding criteria (will the option/proposal…)
SA No 1: To enable vibrant and inclusive communities	Reduce the potential for social isolation by encouraging safe social connectivity Have particular regard for potentially disadvantaged groups (cultural, ethnic, poor, ageing, physical & mentally disabled, single parents, carers, travellers, migrants/refugees) Encourage/support community participation in activities & democratic decision-making
SA No 2: To provide accessible essential services and facilities for all residents	Maintain & improve social & community facilities – meet needs of facilities that support new housing Support the provision of and access to education & training opportunities Encourage facilities that are adaptable to future changes in technology Encourage & support people to live healthy, active lives Ensure facilities are accessible to all, including those with physical or mental disabilities Enable & encourage accessibility to green infrastructure network
SA No 3: To improve health and promote active living	Reduce health inequalities Reduce deprivation with particular regard to deprivation pockets in Coventry Promote active living by facilitating active travel & encouraging healthy lifestyles Improve physical health & mental wellbeing for the ageing with better resilience (both physical & cognitive reserve) Create safe neighbourhoods & help reduce crime, including violence especially against women & girls
SA No 4: To provide decent and affordable housing for all	Provide suitable mix & tenure of housing, with particular regard to affordable homes and for younger people including Coliving & HMOs Provide suitable housing for the ageing, including for adaptability & resilience (physical & cognitive) Ensure that the best use is made of existing housing stock Meet the needs of potentially disadvantaged groups, including Travellers, single parents, carers
SA No 5: To support sustainable inclusive economic growth	Promote jobs & skills development Provide access to a range of employment opportunities Renew vitality and viability of local centres Support the retail & leisure sectors to recover/renew after Covid 19
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions	Promote energy hierarchy – fabric first, reducing energy use, then mitigating residual emissions Incorporated consideration of embodied carbon Support retrofitting of existing development Promote/deliver renewable or low carbon energy generation Proximity of development to sustainable transport see also SA No 8

SA No 7: **To build resilience to climate change**	Take the long term risk of flooding into account Reduce risks from overheating & extreme weather events Provide adaptive techniques in building design such as passive heating/cooling Incorporation of GI measures such as green space & tree planting to support urban cooling see also SA Nos 11 & 13
SA No 8: **To reduce traffic & improve sustainable transport choices**	Reduce the need to travel by private vehicle Discourage car travel Support & improve a strong, inclusive sustainable transport network, including cycling & walking opportunities & buses/taxis with increased uptake for low/zero emission vehicles
SA No 9: **To reduce air, noise & light pollution**	Help to improve air quality – outdoors and indoors Help to reduce noise pollution & avoid noise disturbance Help to reduce light pollution & avoid light disturbance
SA No 10: **To protect &conserve natural resources - soil, water, minerals & waste**	Make use of previously developed, degraded or under-used land Minimise the loss of best & most versatile (BMV) agricultural land Encourage local food through allotments & urban farming Promote efficient use of water resources Avoid loss or sterilisation of mineral resources Maximise the reuse, recycling & composting of waste
SA No 11: **To protect and enhance nature & biodiversity**	Protect, maintain or enhance features of biological importance Contribute to the positive management of local biodiversity & geodiversity sites Contribute to the wider GI networks – green and blue Contribute to opportunities for wildlife to adapt to a changing climate Deliver measurable biodiversity net gain Address any issues from Transport & Air Quality for nitrogen deposition & designated sites & sites of local importance (see also SA No 8)
SA No 12: **To protect and enhance the historic environment, and its setting**	Conserve and/or enhance heritage assets & their setting Respect & strengthen local character, distinctiveness & sense of place Sustain & enhance the significance of heritage assets by encouraging new viable uses Support public accessibility and/or encourage cultural/tourist use consistent with conservation Identify opportunities to focus on heritage assets at risk
SA No 13: **To protect and enhance the quality and character of townscapes and landscapes**	Protect & enhance local character, distinctiveness & sense of place Protect & enhance visual amenity Restore degraded townscapes & landscapes Affect the purposes of the Green Belt

2.7 The SA objectives are aligned with suggested indicators to help guide assessment and potentially for future monitoring purposes, as follows:

Table 2.2 SA Objectives & Suggested Indicators

SA Objective	Suggested Indicators
SA No 1: To enable vibrant and inclusive communities	Indices of Multiple Deprivation (IMD) Provision for potentially disadvantaged people Community participation
SA No 2: To provide accessible essential services & facilities for all residents	Proximity to, and capacity of, GPs, dentists, healthcare services Proximity to, and capacity of, nurseries, primary & secondary schools Proximity to range of retail, leisure, sports & cultural facilities Proximity to, and availability of, green infrastructure
SA No 3: To improve health and promote active living	Health Index for England Reduction in health inequality Increase in active living Independent living & resilience for the ageing Reduction in crime
SA No 4: To provide decent and affordable housing for all	Provision of housing mix Provision of affordable housing Provision of HMOs, Coliving Provision of student accommodation; PBSAs Meeting Gypsies & Travellers' needs
SA No 5: To support sustainable inclusive economic growth	Delivery of employment space Support for centres & revitalisation/regeneration Number of vacant units Number of unemployed
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions	GHG emissions Embodied carbon Energy generation/use from renewable or low carbon sources Incorporation of GI
SA No 7: To build resilience to climate change	Location in areas of risk from flooding Provision of sustainable drainage systems Provision of, & connectivity to, GI & Blue Infrastructure Provision of adaptive techniques in building design
SA No 8: To reduce traffic & improve sustainable transport choices	Connectivity & proximity to sustainable transport options – bus, rail, cycle, walking Uptake of parking restrictions to discourage car use
SA No 9: To reduce air, noise & light pollution	NO_2 & PM monitoring data Number of complaints – noise; light
SA No 10: Protect &conserve natural resources - soil, water, minerals & waste	Area of BMV agricultural land Reuse of previously developed or brownfield land Remediation of contaminated land Quality & quantity of water resources Mineral safeguarding areas (MSAs) Waste generation – household, commercial Rates of recycling & composting Capacities of waste management facilities
SA No 11: To protect and enhance nature & biodiversity	% biodiversity net gain (NE draft metric) Provision of, & connectivity to, GI/BI networks Enhancement & provision of long term management

SA No 12: **To protect and enhance the historic environment, and its setting**	Potential impacts on heritage assets & their setting Historic assets on HE's Heritage at Risk Register
SA No 13: **To protect and enhance the quality and character of townscapes and landscapes**	Reuse of derelict/abandoned buildings Quality of streetscapes & the public realm Sensitivity & visual amenity studies Development in the Green Belt

2.8 The nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary[13], cumulative[14] and synergistic[15]) were described where possible and reported in the appraisal commentary, together with any assumptions or uncertainties, such as information gaps. Where necessary, the SA made suggestions and recommendations to mitigate any potential negative effects or promote opportunities for enhancement. The appraisal was undertaken using professional judgment, supported by the baseline information and the wider Local Plan evidence base.

2.9 A qualitative approach was established for investigating policy areas/topics, for testing reasonable alternatives, and for assessing the implementation of the plan as a whole. Significance was estimated according to the categories as set out below:

Table 2.3: Significance Key

[13] Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.
[14] 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.
[15] These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

Key: Categories of Significance		
Symbol	**Meaning**	**Sustainability Effect**
- -	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral Negligible	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

Options in Plan-Making & Reasonable Alternatives in SA/SEA

2.10 The SEA Regulations require that the SEA should consider the effects of "*reasonable alternatives*". Planning Policy Guidance[16] 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*."

2.11 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy or aspiration) rather than a clear expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. At the later and lower levels of development planning for site allocations, options assessment tends to be more specific - often focused on criteria and defined thresholds, such as walking/cycling distances to services/facilities.

2.12 During the progression of technical studies and early development of issues and options for plan-making, certain strategic options were identified for topics, as follows:

- Quantum of housing
- Residential density

[16] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

- Climate Change & Standards for Building Regulations
- Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI)

2.13 These strategic options were tested with high level appraisal through SA using the SA framework of objectives and in a comparable and consistent manner. The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects. There can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.

2 SUSTAINABILITY CONTEXT & SUMMARY BASELINE CHARACTERISATION

Introduction

3.1 In order to establish a clear scope for the SA of the CLPR, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline characteristics and conditions of the plan area and the wider range of plans and objectives that are relevant to the CLPR. The SA Scoping Report (March 2023) for the Local Plan Review considered the baseline conditions and policy context for the plan area that may affect or be affected by the development to be proposed in the emerging draft CLPR. Analysis of this information enabled the SA to identify the key issues and opportunities for sustainable development in the Coventry city area and create sustainability objectives to address these key issues. Full details can be found in the SA Scoping Report[17] (draft January 2023; final March 2023) and summaries are presented in this Section 3 of the SA Report.

Policy Context

3.2 A comprehensive range of relevant plans and strategies were investigated according to sustainability themes, as follows: Communities, Health & Wellbeing; Housing; Economy; Climate Change; Transport & Air Quality; Natural Resources (Soil, Water, Waste, Minerals); Nature & Biodiversity; Historic Environment; and Townscape & Landscape. Key documents investigated including the following:

National:

National Planning Policy Framework (NPPF, updated 2021)
Public Health Strategy England 2020-2025
Public Health England (PHE) Health Impact Assessment in Spatial Planning (2020)
Healthy Ageing: applying all our health (2021)
Health Equity in England: The Marmot Review 10 Years On (February 2020) highlights that people can expect to spend more of their lives in poor health; the health gap between wealthy and deprived areas has grown; and place matters. Build Back Fairer: The **Covid-19 Marmot Review** (2022)
Active Travel England (DfT, July 2022)
UK Net Zero Strategy: Build Back Greener (2021) sets out approaches to keep the UK on the path to achieving net zero carbon by 2050
Heat and Buildings Strategy (2021)
Severn River Basin District Flood Risk Management Plan (2015-2021)
A Green Future: Our 25 Year Plan to Improve the Environment (2018, updated 2021) includes actions to reduce pollution by tackling air pollution

[17] Available on the Council's website

Clean Air Strategy (2019) recognises that vehicles are not the only source of harmful emissions and aims for better cleaner technology and changes in behaviour
Environment Act (2021) provides the UK's new framework for environmental protection with new powers to set new binding targets, including for air quality water, biodiversity, and waste reduction/resource efficiency; establishes **Local Nature Recovery Strategies** and a new system for **Biodiversity Net Gain** (BNG) from development projects
Environmental Improvement Plan (January, 2023) for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home. **Natural England's Green Infrastructure (GI) Framework** (Feb 2023) provides a structure to analyse where greenspace in urban environments is needed most.
Historic England (HE) Championing Heritage Improving Lives Future Strategy (2021) and **Historic England Climate Change Strategy to 2040** (March 2022)
National Design Guide (2019, updated 2021) sets out the characteristics of well-designed places and demonstrates what good design means in practice
Building for a Healthy Life (BHL) updates and refines the BHL12 design code with its 12 considerations to help people improve the design of new & growing neighbourhoods

Regional & Local:

One Coventry Plan (CCC, 2022-2030)
Coventry Joint Needs Assessment (JNSA, 2019)
Coventry Health and Wellbeing Strategy 2019-2023
Health Inequalities Strategic Plan 2022-2027 (Coventry & Warwickshire Health & Care Partnership)
Coventry Cultural Strategy 2017-2027
Coventry Housing & Homelessness Strategy 2019-2024 (2019) focuses on 4 key areas: Preventing & Supporting Homeless Households; Support for People & Communities; Improving the Use of Existing Homes; and Housing Development
West Midlands Combined Authority Strategic Economic Plan is focusing on digital innovation; building a net-zero economy and creating thousands of green manufacturing jobs; building better digital and transport links
Coventry & Warwickshire Strategic Reset Framework Local Enterprise Partnership (CWLEP) aims to reset the economy following the impacts of Covid-19
Economic Growth & Prosperity Strategy for Coventry 2018-2022
West Midlands Combined Authority has set a priority for the region to become net zero by 2041, and Coventry Council is working on a **revised Climate Change Strategy** 2022-2030 setting out how Coventry will remain within its carbon budget
Warwickshire Local Transport Plan 2011-2026 and **Coventry Transport Strategy** (2022/23-2036/37)
Coventry City Council Local Air Quality Plan (LAQP, 2020-2024) is focused on transport and behaviour change around travel
Warwickshire County Council Minerals Plan (2018)
Severn Trent Water Resource Management Plan (2019);
Warwickshire Wildlife Trust Strategy 2030

Warwickshire, Coventry & Solihull Green Infrastructure (GI) Strategy

Summary Baseline Conditions

3.3 **Communities, Health & Wellbeing:** The total population of Coventry City Council was 345,300 (ONS 2021) an 8.9% growth from 2011 to 2021, and this is higher than the rate of 6.2% in the West Midlands. The population has growth particularly amongst younger adults, particularly aged 20-24. In 2020/21 academic years there were 67,255 students in Coventry universities. As with the population of England & Wales, census data confirm that there are more people in older age groups. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042.

3.4 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. For the period 2015-2018, the Health Index for Coventry was 97.8, less than 100 average for England.

3.5 There is a need to plan for a growing, changing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing. As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. Further work is needed at the local level through the place-based profiles to understand the city's avoidable outcomes, particularly around issues such as alcohol use and obesity/physical activity.

3.6 **Housing:** Housing delivery in the latest monitored period (AMR 2021/22) indicates that the cumulative delivery of 16,182 dwellings is 25% above the requirement of 12,900 at this stage of the Local Plan trajectory. This can be largely attributed to the recent growth of Purpose Built Student Accommodation (PBSA), reflecting Coventry's rising reputation as a leading university city that attracts students from around the world. The delivery of affordable housing was below the annualised need.

3.7 New demographic projections have been modelled recently (HEDNA, November 2022) to estimate the amount and type of housing that will be needed over the period to 2041 and 2050. The analysis indicates that the need for social or affordable rented properties should be focused on smaller properties. The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Self-build and custom housebuilding is a growing sector of the housing market; also the potential for co-living to be considered. Coventry's housing stock is typically small and old;

a lot of houses are not to modern efficiency standards. In 2021, 20% of Coventry households live in low-income low energy efficiency households, compared to just 13% nationally.

3.8 **Economy:** The strengths of the city's economy, where Coventry has a competitive advantage, include advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional and financial services; and digital, creative, and gaming. Before the pandemic hit, the Coventry & Warwickshire economy had grown at a rate higher than other LEPs in the country. Since Covid-19, the issues for the retail sector, and town centre retail in particular, are well known. Many hospitality and other businesses depend on the success of major tourist attractions. Overall delivery of employment land remained comfortably above the cumulative requirement of 70.40 ha at this stage of the Local Plan trajectory.

3.9 **Climate Change:** 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. The overall aim of the Strategy is to achieve a dramatic reduction in carbon emissions. 47% of all UK CO_2 emissions are linked to the construction and operation of buildings – both housing and commercial.

3.10 **Transport & Air Quality:** A Coventry City-Wide AQMA was declared for nitrogen dioxide in 2009 and emissions from road transport are the principal source of NO_2. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO_2 standard. Indoor air pollution is becoming an increasing proportion of the problem as improvements in outdoor air pollution occur.

3.11 **Natural Resources (Soil, Water, Minerals, Waste)**: The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. In the English part of the Severn River Basin District, the majority of water bodies have an objective of good ecological status. For many of the water bodies, there is low confidence of meeting their objective by 2027 and pollution from wastewater remains one of the main reasons. Historically coal mining has been a dominant industry in Coventry but there are now no active working collieries in the area. Sand and gravel are required for minerals planning. 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.

3.12 **Nature & Biodiversity:** There are no internationally designated nature conservation sites (European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar sites) located within 20 km of the Coventry city centre – with the exception of the somewhat isolated Ensor's Pool SAC approximately 7.4 km to the north of the local plan boundary. There are 16 Local Nature Reserves (LNRs), and 21 designated areas of ancient

woodland. The Warwickshire, Coventry & Solihull Local Biodiversity Plan (LBAP) comprises 52 action plans for species and habitats, ranging from wetlands and woodlands to urban and rural settlements. The Coventry area contains, and is in close proximity to, a number of both designated and non-designated natural habitats and biodiversity. The overall ecological network is also important for biodiversity helping to support the condition of designated sites and also enabling species to migrate in response to climate change.

3.13 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Coventry has over 400 Listed Buildings of national importance, together with over 280 buildings selected by the Council for Local Listing. The city has 16 Conservation Areas, 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. The Coventry Historic Landscape study (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. Coventry has benefited from two Heritage Action Zones. The first focused on the city centre where we worked with partners to transform Coventry through heritage.

3.14 **Townscape & Landscape:** Coventry is located within the Arden National Character Area (NCA) as profiled by Natural England. 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 (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. The Ancient Arden is an area of ancient countryside that stretches from just south of Atherstone in the North, running to the west of Coventry to Balsall Common in the south, and is especially important as an area of ancient countryside. The Coventry Green Belt remains an important mechanism to prevent urban sprawl, prevent towns merging; safeguard countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration.

Key Issues & Opportunities for Sustainable Development

3.15 From the policy context and analysis of the baseline information, the following key sustainability issues and opportunities were identified for the Coventry Local Plan Review area:

Table 3.1: Key Sustainability Issues & Opportunities

Topic	Key Issue for Sustainable Development
Communities, Health & Wellbeing	▪ Increasing population, especially in older age groups ▪ Need to plan for a growing, changing and increasingly diverse population ▪ As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing

	▪ Need to focus on prevention to improve health & reduce inequalities - will need a community-informed and culturally competent approach ▪ further work needed at the local level through the place-based profiles, particularly around issues such as alcohol use and obesity/physical activity
Housing	▪ The need to maintain a mix of new homes continues into to the 2040s ▪ Housing for the increase in the ageing group that will require resilience and adaptability to enable independent living longer, and then increased care & support ▪ Self-build and custom housebuilding, as well as Coliving, are growing elements of the housing market ▪ High number of young people – need affordable homes ▪ Significant student population predicted to increase; as more PBSA schemes become built, other housing will be released into wider housing market ▪ need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes ▪ Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards
Economy	▪ Dramatic changes, accelerated by Covid-19, are likely with the shift from retail to other uses and a change in character of the city and local centres ▪ Employment and education/training uses may be able to fill gaps, including with coworking spaces and/or encouraging start-ups ▪ Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people
Climate Change	▪ Planning for climate change adaption should be a part of every new development ▪ Significant shifts in energy efficiency will be needed for new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure ▪ Retrofitting existing buildings will be a very significant challenge ▪ Consideration of embodied carbon is an ongoing challenge for the construction industry ▪ Planning for climate change mitigation means building resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment ▪ Increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK

Transport & Air Quality	▪ Improve the sustainability of the transport system, improve integration with walking and cycling routes and green infrastructure networks, and promote more active travel ▪ Reducing vehicle emissions will continue to improve air quality; Indoor air pollution is becoming an increasing proportion of the problem ▪ Transport policies need to both encourage sustainable modes and also to discourage car use– for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options ▪ Improvements in renewable transport provision and restrictions on car use in the city centre will help the city achieve zero carbon objectives ▪ Improvements to walking and cycling infrastructure need to be inclusive, for all residents and visitors, and to link within a wider network that aims to connect with the Family Hub priority areas identified for poor health ▪ Improving sustainable transport networks and associated green infrastructure (GI) will also benefit nature and wellbeing for people ▪ Encouraging active travel will help at the local level towards improving some of the city's health issues such as those associated with obesity and physical activity
Natural Resources	▪ Continue to build on previously developed land where effectively located; minimise the use of water and minerals as natural resources; and the need to reduce waste and reuse/recycle ▪ The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place ▪ This would require careful consideration of reduced car ownership/parking but would further promote the Council's objectives towards zero carbon ▪ The best agricultural land must be conserved and effects of climate change may affect food security
Nature & Biodiversity	▪ Need to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain ▪ Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities ▪ There are priority areas that would benefit particularly from greening ▪ Off-site areas for biodiversity net gain may be needed ▪ Climate change is likely to affect changes to habitats and species distribution ▪ There may be opportunities to enhance blue infrastructure and update requirements taking into account recent legislation on nature and biodiversity

Historic Environment	▪ Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects ▪ It is important to understand heritage value and local design guidance can be informed by local communities ▪ Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting
Townscape & Landscape	▪ Townscape is closely interwoven with the historic environment ▪ It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city and countryside ▪ Green, blue and open spaces should be woven into the urban design ▪ Green Belt remains an important mechanism to prevent towns merging and safeguard countryside from encroachment

Likely Evolution of Area without the Local Plan

3.16 There are likely to be some changes in sustainability characteristics of the Coventry area even without the review of the Local Plan to 2041. For example, the increasing use of electric cars, revised Building Regulations, and at least 10% biodiversity net gain with new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, more energy-efficient homes, and some recovery for the loss of nature and biodiversity.

3.17 However, the ongoing impacts of Brexit, Covid-19 and the emerging recession are likely to have negative effects on socioeconomic factors. The economic outlook for Coventry[18] remains challenging and uncertain, exacerbated by the rapid inflation in 2022 that threatens the city's recovery, with rapidly increasing energy prices and cost-of-living impacting on the finances of households and businesses. The predicted increase in population, with changing demographics, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens.

3.18 Without the Local Plan, there would be no local guidance on housing such that the particular needs of tenure and mix in the right places are unlikely to be met. This could exacerbate existing problems, particularly for affordability, overcrowding and quality, with concomitant negative effects for health and wellbeing. There is a risk that communities would become unbalanced with issues for the capacities of services and facilities in some areas, and perhaps challenging those areas that are already deprived. It is less likely that objectives for social inclusivity and vibrant communities would be achieved. Active living would be less encouraged. It is possible that neighbourhoods

[18] https://www.coventry.gov.uk/facts-coventry/coventry-72

could become less safe and crime reduction would not be enabled in the absence of spatial planning.

3.19 Buildings contribute a significant proportion of GHG emissions and without the Plan, there would less progression towards aims for addressing the climate change crisis. Whilst national policy would still guide mitigation measures such as flood risk management and building regulations for building resilience to climate change, without the Plan there would be no cohesion or strategic coordination such that mitigation may not be optimised and opportunities may not be realised.

3.20 Increasing demands from development on green spaces and nature/biodiversity and natural resources, especially air, soil and water, will continue to have negative effects on the urban environment and people's quality of life. Without the Plan, there will be less effective use of land and this will affect other factors such as biodiversity and food security. There are priority areas that would benefit particularly from greening. The sustainable management of water is increasingly an issue with demands from new development and the needs of nature/biodiversity. Without the Plan, there is likely to be less integration of the different uses and needs of the water environment when considering new development.

3.21 Overall, mitigation measures of new development would not be coordinated to best avoid or reduce the adverse effects from development, including cumulative effects. Opportunities from new development, such as improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

4 SA OF STRATEGIC OPTIONS

Identifying the Strategic Options

4.1 During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified and considered should be tested through the SA process. The strategic options identified are outlined, as follows:

4.2 **Strategic Options for Quantum of Housing Needs**: Coventry Council, together with local authority Partners across Coventry & Warwickshire published a new Housing & Economic Needs Assessment (HEDNA, November 2022) that sets out the amount and type of housing and employment growth that will be need to be planned for up to the year 2041. The Housing Topic Paper[19] sets out the potential housing scenarios and explains how these were identified.

- Scenario 1 is the Government's Standard Method calculation. This uses the 2014 Population Projections which have been shown to be erroneous for Coventry. This method indicates a total minimum need of 63,760 new homes over the plan period.
- Scenario 2 is the amount identified through the HEDNA. This uses the more accurate 2021 Census data rather than the erroneous 2014. figures. It indicates a need of 39, 280 new homes over the plan period.
- Scenario 3 is the HEDNA figure but with the 35% uplift removed (Government has applied this uplift to England's largest cities). It indicates a need of 29,200 new homes over the plan period.

Table 4.1a: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method[20] (with ONS population projections from 2014)[21]
2	39,280 dwellings (1,964 per annum) – HEDNA method[22] (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities[23]

[19] Coventry City Council (May 2023) Housing Topic Paper

[20] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

[21] The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/ and https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf

[22] Housing & Economic Development Needs Assessment (HEDNA, November 2022) https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna

[23] Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

4.3 **Strategic Options for Residential Density:** It is important that the Council accommodates as much of its identified need as possible. Further work will be undertaken to see whether parts of the city can accommodate increased densification. In particular, there could be suitable possibilities for increasing densities to 200 dwellings per hectare (dph) at certain locations adjacent to, and outside of, the ring road. The initial SA investigated through high level assessment two scenarios, as follows:

Table 4.1b: Options for Residential Density	
1	Greenfield 30 dph[24]; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations

4.4 **Strategic Options for Progressing the Coventry Climate Change Strategy[25]**: At the time of writing, responses to the consultation draft were being analysed and it is anticipated that the final Strategy will be published in summer 2023. The Strategy aims for a dramatic reduction of carbon emissions and sets out five development pathways to sustainability:

- Low emissions – new economic opportunities
- Nature-based – enhance biodiversity & urban ecosystems
- Circular economy – new models of production & consumption
- Resilient -anticipate, prevent, absorb, and recover from shocks
- Equitable and people centred – inclusive urban communities & addressing poverty

4.5 For the Local Plan Review, this means particular opportunities for energy efficiencies and renewables; enhancing biodiversity; high quality design that promotes active travel; accessibility to public transport and minimising need for private vehicles; reduce flood risk and heat gain. At the early stages of the plan review, it was considered that there were possibilities for requiring standards for buildings and homes higher than is likely to be required nationally – in order to better support the ambitions of the Coventry Climate Change Strategy. The initial SA investigated through high level assessment two scenarios, as follows:

[24] Dwellings per hectare
[25] Coventry Climate Change Strategy 2022-2030 (consultation draft 2023) https://www.coventry.gov.uk/draftclimatechangestrategy

Table 4.1c: Options for progressing Coventry's Climate Change[26] that aims for "*The dramatic reduction of carbon emissions to achieve carbon neutrality with a 100% reduction to 1990 levels by 2050 at the very latest*"	
1	Planning policy requirements in line with national Future Homes Standard[27] & Future Buildings Standard[28] covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

4.6 **Strategic Options for Nature & Biodiversity:** There have been significant recent changes in requirements nationally aiming to ameliorate the critical losses of nature and biodiversity. It is considered that the Local Plan Review has strong opportunities to strengthen the importance of nature and biodiversity in the general wellbeing of a city to improve health and support climate change resilience. The details are set out in the Green Infrastructure & Biodiversity Topic Paper[29]. The initial SA investigated through high level assessment two scenarios, as follows:

Table 4.1d: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG)[30], and Green Infrastructure (GI) standards[31]
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

4.7 **Overall Approach:** The plan-making and SA teams worked in an iterative way to identify the meaningful strategic options for investigation. These strategic options were tested with high level appraisal through SA using the SA framework of objectives, the baseline information, and professional judgment. The high level assessment aimed to investigate the strategic options in a comparable and consistent manner. However, it should be noted that there is much uncertainty of significance of effects at the strategic level, including in the medium to longer term, and particularly with topics such as climate change. The SA made suggestions for the plan-making (to mitigate potential negative effects and to enhance potential opportunities) to consider to help inform decision-making as the preparation of the plan review develops further. The detailed findings of the SA of the strategic options are presented in Appendix III of this SA Report.

[26] Coventry's draft Climate Change Strategy 2023-2030 https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy
[27] For example, please see: https://www.futurehomes.org.uk/delivery-at-scale
[28] https://www.gov.uk/government/consultations/the-future-buildings-standard
[29] Coventry City Council (May 2023) Green Infrastructure & Biodiversity Topic Paper
[30] Environment Act 2021, and for example, please see https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/
[31] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx

SA of Strategic Options: Quantum of Housing

4.8 **Vibrant Communities**: There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The provision of new good quality homes will have positive effects for people, and higher numbers of new homes could have positive effects for more people. However, the higher quantum of new development is likely to overload the capacity of existing communities to absorb new people.

4.9 Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical and mental disability, single parents, carers, travellers, but not explicitly ethnic or cultural housing needs. Overall, likely minor positive effects for all 3 options.

4.10 **Services & Facilities**: The location of new development is guided by specific policies – and these consider accessibility to physical, social and green infrastructure – including appropriate mitigation measures to ensure that services and facilities are sufficient. It is considered that the lower quantum of new housing in Option 3 is less likely to overload the capacity of services and facilities – and indicated by initial capacity studies - with less negative effects and therefore, overall more likely positive effects.

4.11 **Health & Active Living**: Coventry became a Marmot City[32] in 2013 and is committed to reducing inequality and improving health outcomes for all. Since 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. Provision of good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental – therefore, positive effects for all 3 options.

4.12 The effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Therefore, some uncertainty of the significance of the positive effects for Options 1 & 2.

4.13 **Housing for All**: It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in

[32] https://www.coventry.gov.uk/policy-1/coventry-marmot-city

Options 1 and 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – therefore, some uncertainties for significance of positive effects. According to recent initial capacity studies, Option 3 could deliver the identified need for housing indicating major positive effects for housing objectives.

4.14 Further capacity sturdies will be undertaken as the review of the CLP progresses. Whilst delivery has not been an issue for the Council, there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 & 2, and to meet with other objectives, particularly for climate change and biodiversity. It remains important to address any imbalance in the distribution of particularly affordable/social housing, and the need to improve the quality of the existing housing stock.

4.15 **Economy:** Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The HEDNA (Nov 2022) considered population, housing growth and the economy in tandem based on the 2021 census figures. Taking into account the initial capacity studies, it seems that Option 3 could potentially be accommodated, indicating minor positive effects for employment objectives but with some uncertainty of significance at this stage until more studies are undertaken.

4.16 The highest quanta in Options 1 and 2 could require re-allocation of some employment land and/or result in increased commuting for work, indicating likely negative effects. It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working and hybrid working, will affect requirements for employment land during the plan period.

4.17 **Climate Change – Carbon Emissions**: The Council recognises the climate crisis and at the time of writing is finalising its updated Strategy (2022-2030). 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. All new housing development will need to meet updated national policy requirements, indicating minor positive effects for all 3 options in the longer term - assuming that the zero carbon trajectory can be achieved. However, there is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to meet with net zero carbon – particularly in the shorter term. Viability and costs may also be an issue in the shorter term as the construction industry develops new methods.

4.18 **Climate Change – Resilience**: There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment. All new housing development

will need to meet updated policy requirements that seek to help the Council build resilience to climate change.

4.19 There is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to build resilience – suitable land and viability (and particularly in the shorter term until technology catches up with requirements). Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with minor negative effects for Options 1 and 2, that will be cumulative in the longer term - but uncertainties of significance at this stage of assessment.

4.20 **Transport & Movement**: A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options. It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1, due to boundary constraints.

4.21 The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quantum of housing in Option 3 is less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked & more extensive.

4.22 **Reduce Pollution:** In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem. Noise pollution is an acknowledged issue for human health & wellbeing – physical & mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress & anxiety (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies that will be updated providing mitigation measures such that there will be no significant negative effects and overall indicating likely neutral or negligible effects.

4.23 **Natural Resources:** The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP will recommend that priority is given to continuing to build on previously developed land (PDL) where effectively located – and indicating negligible effects on soil resources.

Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. The cumulative effects of the higher quanta of housing in Options 1 & 2 may incur minor negative effects but with some uncertainty at this stage. It is assumed that policies on minerals and waste management will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1.

4.24 **Nature & Biodiversity:** It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain. Unequal distribution, and access to, green infrastructure (GI) across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.

4.25 The higher quanta of housing in Options 1 and 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain. Land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects are indicated. The initial capacity studies have suggested that there could be capacity in the city for the quantum in Option 3 and therefore, likely negligible or neutral effects. Overall, some uncertainties of significance of effects as dependent upon locations, densities, and any possibilities for sufficient offsite measures.

4.26 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting.

4.27 CLP policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. However, the quantum of housing in Option 1 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. The historic environment is closely interwoven with townscape and good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context and setting.

4.28 **Townscape & Landscape**: It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of

different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. Climate change and population growth are exacerbating environmental issues in urban areas. it is vital that space for green and blue infrastructure is retained and enhanced, including improvements to linkages and networks that will further benefit people and nature.

4.29 Significant negative effects are likely for Options 1 and 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded and other mitigation measures in the design process. New development that is high quality, creative and proportional to the receiving townscape and local environment can have very positive effects, and also act as a catalyst for further enhancement of quality and human wellbeing to the built environment. Therefore, positive effects are likely for Option 3 as it has been indicated by the initial capacity studies that such housing numbers can be accommodated within the urban area.

4.30 The summary findings of the initial high level SA of strategic options for the quantum of housing need are presented in Table 4.2a, as follows:

Table 4.2a: Strategic Options for Quantum of Housing Development **Sustainability Objective**	**1_Standard Method (2014)**	**2_Standard Method (2022)**	**3_Standard Method less 35%**
1: To enable vibrant and inclusive communities	+	+	+
2: To provide accessible essential services and facilities for all residents	+	+	++
3: To improve health & promote active living	+?	+?	+
4: To provide decent and affordable housing for all	+?	++?	++
5: To support sustainable inclusive economic growth	--?	-?	+?
6: To help achieve the Council's ambition to reach net zero carbon emissions	+?	+?	+
7: To build resilience to climate change	-?	-?	+
8: To reduce traffic & improve sustainable transport choices	--?	-?	0?
9: To reduced air, noise & light pollution	0?	0?	0?
10. To protect & conserve natural resources – soil, water, minerals & waste[33]	- / 0?	-? / 0	0 / 0
11: To protect and enhance nature & biodiversity	--?	-?	0?
12: To protect and enhance the historic environment, and its setting	-?	0?	0
13: To protect and enhance the quality and character of townscapes & landscapes	--?	0?	+?

[33] First cell refers to land/soil & water resources; second cell refers to minerals & waste

SA of Strategic Options: Residential Density

4.31 The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land. The Council is investigating possibilities for increasing residential density outside the ring road in certain locations – to help meet with the increased need identified for housing development.

4.32 **Vibrant Communities**: It is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road. There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), and promoting higher densities will better protect and conserve natural resources (SA No 10 soils). There is some uncertainty about whether the extant density arrangements will be able to accommodate the increased housing requirements.

4.33 **Services & Facilities**: It is unclear whether the current approach to residential densities would actually be able to accommodate the identified housing needs. Capacity studies will inform the implications for provision of services and facilities - and mitigation measures will be proposed through updating of relevant policies such that there should be no significant adverse effects. Some uncertainties as effects will depend on overall quantum of housing confirmed and locations.

4.34 **Health & Active Living**: Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities. CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, will be updated and thus there will be no significant negative effects through the current approach to densities. Since the provision of good quality housing is known to have positive effects on health & wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects.

4.35 **Housing for All**: It is unclear whether the current approach to residential densities would actually be able to accommodate all the identified housing needs but it would progress provision such that positive effects are indicated for Option 1, with some uncertainty of significance at this stage of assessment.

If ensuring that needs, including suitable mix and tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2.

4.36 **Economy:** Options for housing densities will not directly affect objectives for economic growth and therefore, neutral effects for SA No 5.

4.37 **Climate Change – Carbon Emissions & Resilience**: All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions. Therefore, neutral effects for SA No 6 & No 7.

4.38 **Transport & Movement**: The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road and where there is good accessibility and capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed.

4.39 **Reduce Pollution**: Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design and materials resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for both options.

4.40 **Natural Resources**: Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification and location.

4.41 **Nature & Biodiversity**: The scale of new development needed is likely to have strong pressures on green infrastructure (GI) and biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained and with such importance for protecting spaces for GI and biodiversity. There are possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification and location.

4.42 **Historic Environment**: The adopted Plan includes policies to protect the historic environment and these policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities with negligible effects for both options.

4.43 **Townscape & Landscape**: It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics & different possibilities for accommodating changes through increased development. High quality and proportionate new development can enhance the townscape and local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be taken from other places; with high quality design, positive effects could be indicated but with uncertainty at this stage of assessment.

4.44 The summary findings of the initial high level SA of strategic options for residential density presented in Table 4.2b, as follows:

Table 4.2b: Options for Residential Density **Sustainability Objective**	**1_Outside ring road minimum 35 dph**		**2_Outside ring road >35 dph in certain locations**	
1: To enable vibrant and inclusive communities	**0?**		**+**	
2: To provide accessible essential services and facilities for all residents	**0?**		**0?**	
3: To improve health & promote active living	**0?**		**+?**	
4: To provide decent and affordable housing for all	**+?**		**++**	
5: To support sustainable inclusive economic growth	**0**		**0**	
6: To help achieve the Council's ambition to reach net zero carbon emissions	**0**		**0**	
7: To build resilience to climate change	**0**		**0**	
8: To reduce traffic & improve sustainable transport choices	**0**		**0**	
9: To reduced air, noise & light pollution	**0**		**0**	
10: To protect & conserve natural resources – soil, water, minerals & waste[34]	**-**	**0**	**++ ?**	**0**

[34] First cell refers to land/soil & water resources; second cell refers to minerals & waste

11: To protect and enhance nature & biodiversity	-?	++?
12: To protect and enhance the historic environment, and its setting	0	0
13: To protect and enhance the quality and character of townscapes & landscapes	0?	+?

SA of Strategic Options: Climate Change

4.45 **Vibrant Communities; Services & Facilities**: Other factors are more likely to have potential effects on objectives for inclusive communities and services/facilities than requirements in line or above Building Regulations. Therefore, likely negligible or neutral effects for SA numbers 1 and 2.

4.46 **Health & Active Living**: An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health and wellbeing by better reducing the risks to health. Climate change affects the social and environmental determinants of health - clean air, safe drinking water, sufficient food and secure shelter. Any consequence of climate change that can bring physical ill health can also have mental health implications and climate change can negatively impact on mental health, including depression and anxiety.

4.47 Aligning with Government requirements may be considered to have negligible but uncertain effects for health and wellbeing. However, by requiring standards over and above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner and will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical and mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.

4.48 **Housing:** There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials. Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design and building – and particularly construction – such that costs and viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon and implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling. With commitment and creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain and unknown at this stage.

4.49 **Economy**: It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21st century. Coventry has strong commitments for innovation, research and development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations. Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.

4.50 **Climate Change – Carbon Emissions & Resilience**: Implementation of planning policy requiring higher standards to reduce GHG emissions and contribute to building resilience sooner than national requirements will have positive effects towards helping the Council achieve its ambitions but with uncertainties of significance at this stage.

4.51 **Transport & Movement; Reduce Pollution**: Changes to Building Regulations will not affect these SA objectives numbers 8 & 9, and therefore, neutral/not applicable effects.

4.52 **Natural Resources**: Soil has been recognised as an essential national asset. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil and water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented and become effective. Therefore, uncertain negative effects for Option 1.

4.53 Planning policy requirements in Option 2 that are over and above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils and water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment. It is assumed that policies for minerals and waste management will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.

4.54 **Nature & Biodiversity**: Climate change can contribute to biodiversity loss and biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate and adapt to climate change without Nature-Based Solutions. It could be considered that meeting the proposed national standards for building regulations and reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. Progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective so that there could be some positive effects for nature and biodiversity – but uncertainty as depends upon quantum of new development and extent of associated biodiversity gain.

4.55 **Historic Environment**: Relevant policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective so that there could be less risk of negative effects on the historic environment – but uncertainty as depends upon extent of development and location.

4.56 **Townscape & Landscape**: Relevant policies will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design and construction, particularly in the shorter term, if requirements over and above such standards are proposed and thus with some uncertainty of significance.

4.57 The summary findings of the initial high level SA of strategic options for climate change presented in Table 4.2c, as follows:

Table 4.2c: Options for Coventry's Climate Change Strategy – Building Regulations Standards **Sustainability Objective**	**1_In line with FHS & FBS**	**2_Over & above Building Regulations**
1: To enable vibrant and inclusive communities	0	0
2: To provide accessible essential services and facilities for all residents	0	0
3: To improve health & promote active living	0?	++?
SA No 4: To provide decent and affordable housing for all	0?	?
5: To support sustainable inclusive economic growth	0?	+?
6: To help achieve the Council's ambition to reach net zero carbon emissions	0?	++?
7: To build resilience to climate change	0?	+?
8: To reduce traffic & improve sustainable transport choices	0	0
9: To reduce air, noise & light pollution	0	0

10: To protect & conserve natural resources – soil, water, minerals & waste[35]	-?	0	0?	+?
11: To protect and enhance nature & biodiversity	0?		+?	
12: To protect and enhance the historic environment, and its setting	0		+?	
13: To protect and enhance the quality and character of townscapes & landscapes	0		0?	

SA of Strategic Options: Nature & Biodiversity

4.58 **Vibrant Communities**: The provision & accessibility of GI can encourage safe social connectivity & help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives and that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.

4.59 **Services & Facilities; Health & Active Living**: It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects, including for health and wellbeing. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects – that are likely to be synergistic and cumulative, particularly in the longer term. The visible greening of the urban areas could further encourage people in active living with positive effects for health and wellbeing.

4.60 **Housing**: Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all. It is vital that the appropriate mix and tenure of housing, suitable for different housing needs of different people and at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI and in locations where it may better support nature and people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people and climate change. This is a particular challenge for Coventry with its boundary and other constraints. It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum and location of development with uncertainties at this stage of assessment.

[35] First cell refers to land/soil & water resources; second cell refers to minerals & waste

4.61 **Economy**: The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure. Whilst improvements to GI will enhance the local environment for residents, workers and visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.

4.62 **Climate Change – Carbon Emissions & Resilience**: The GI Standards aim to improve resilience to and mitigation of climate change, including increasing carbon capture, preventing flooding, and reducing temperatures during heatwaves - all with positive effects. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for resilience – that are likely to be synergistic and cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI and progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.

4.63 **Transport & Movement**: Improving the sustainable transport network for cycling and walking can be integrated with the GI network for mutual benefits for nature and people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.

4.64 **Reduce Pollution**: Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) and vegetation, including green roofs and wall systems act as sound insulation. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for reducing air and noise pollution – that are likely to be synergistic and cumulative, particularly in the longer term, but with some uncertainty at this stage.

4.65 **Natural Resources**: Provision of GI – both green and blue – will contribute to protecting & conserving the natural resources of soils and water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects. It is not clear how differences in GI standards will directly affect sustainability objectives for waste and minerals – likely negligible effects for both options.

4.66 **Nature & Biodiversity**: Provision of GI – both green and blue – will contribute to protecting & enhancing nature and biodiversity with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection and enhancement of nature and biodiversity but there is uncertainty for the significance of the further positive effects.

4.67 **Historic Environment:** It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.

4.68 **Townscape & Landscape**: Provision of GI – both green and blue – will contribute to protecting and enhancing the quality and character of townscapes and landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection and enhancement of townscapes and landscapes but there is uncertainty for the significance of the further positive effects.

4.69 The summary findings of the initial high level SA of strategic options for nature and biodiversity are presented in Table 4.2d, as follows:

Table 4.2d: Options for Nature & Biodiversity – Standards for Biodiversity Net Gain (BNG) & Green infrastructure (GI) **Sustainability Objective**	**1_In line with national requirements & standards**	**2_Over & above national standards**
1: To enable vibrant and inclusive communities	0	0
2: To provide accessible essential services and facilities for all residents	+	++
3: To improve health & promote active living	+	++
4: To provide decent and affordable housing for all	+?	+?
5: To support sustainable inclusive economic growth	0?	0?
6: To help achieve the Council's ambition to reach net zero carbon emissions	+	++?
7: To build resilience to climate change	+	++?
8: To reduce traffic & improve sustainable transport choices	0	0
9: To reduce air, noise & light pollution	+	++?

10: To protect & conserve natural resources – soil, water, minerals & waste[36]	+	0	++ ?	0
11: To protect and enhance nature & biodiversity	+		++?	
12: To protect and enhance the historic environment, and its setting	0		0	
13: To protect and enhance the quality and character of townscapes & landscapes	+		++?	

[36] First cell refers to land/soil & water resources; second cell refers to minerals & waste

5 CONSULTATION & NEXT STEPS

5.1 This Initial SA Report is being published alongside the Issues & Options draft Coventry Local Plan Review for Regulation 18 consultation. Any comments on the SA will be taken into consideration at the next stage of the draft plan review preparation – Pre-Submission draft CLPR for Regulation 19 consultation anticipated for late 2023/early 2024.

5.2 The Council will review and analyse the representations made on the Regulation 18 consultation. These comments will be taken into account, together with further technical studies, so that a preferred approach to the review of the plan can be prepared. This emerging further draft of the CLPR will be subject to SA to inform plan-making and the findings of the SA will be presented within a SA Report that will accompany the draft CLPR on Regulation 19 consultation.

APPENDICES:

I **Statement of Compliance** (to be completed at Regulation 19 stage)
II **SA Scoping Report** (March 2023, available separately on Council's website)
III **SA of Strategic Options** (April 2023)

Coventry Local Plan Review: Sustainability Appraisal (SA) Appendix III: SA of Strategic Options

IIIa: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method[37] (with ONS population projections from 2014)[38]
2	39,280 dwellings (1,964 per annum) – HEDNA method[39] (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities[40]

IIIb: Options for Residential Density	
1	Greenfield 30 dph[41]; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations

IIIc: Options for progressing Coventry's Climate Change Strategy[42]	
1	Planning policy requirements in line with national Future Homes Standard[43] & Future Buildings Standard[44] covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

[37] https:/www.gov.uk/guidance/housing-and-economic-development-needs-assessments
[38] The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/ and https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf
[39] Housing & Economic Development Needs Assessment (HEDNA, November 2022) https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna
[40] Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
[41] Dwellings per hectare
[42] Coventry's draft Climate Change Strategy 2023-2030 https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy that aims for "***The dramatic reduction of carbon emissions to achieve carbon neutrality with a 100% reduction to 1990 levels by 2050 at the very latest***"
[43] For example, please see: https://www.futurehomes.org.uk/delivery-at-scale
[44] https://www.gov.uk/government/consultations/the-future-buildings-standard

IIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG)[45], and Green Infrastructure (GI) standards[46]
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

Key: Categories of Significance		
Symbol	**Meaning**	**Sustainability Effect**
- -	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral/Neutral	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

[45] Environment Act 2021, and for example, please see https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/
[46] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx

IIIa: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method (with ONS population projections from 2014)
2	39,280 dwellings (1,964 per annum) – HEDNA method (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities

		Options for Quantum of Housing		
Sustainability 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**	**1. Standard Method (2014)**	**2. Standard Method (HEDNA 2022)**	**3. Standard Method less 35% Uplift (2022)**
1: To enable vibrant and inclusive communities	There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The total population of Coventry City Council[47] administrative area was 345,300 with an 8.9% growth in population from 2011 to 2021 – and this is higher than the rate in the West Midlands 6.2% and England 6.6% - and with a high number of young people aged 20-24. It is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042. In line with the rest of England, this is an ageing population. The provision of new good quality homes will have positive effects for people. It could be asserted that higher figures of new homes, as in Option 1, could have more positive effects	+	+	+

[47] https://www.coventry.gov.uk/facts-coventry/population-demographics

	as more new homes could be available to more people – but the higher quantum of new development could overload the capacity of existing communities to absorb new people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. For example, extant Policy H7 covers Gypsy & Travellers, Policy H8 covers the needs of an ageing population, and Policy H10 covers student accommodation. Policy H4 secures a mix of housing and Policy H6 covers affordable housing – the encouragement of mixing should support a wider range of social connectivity and community interaction – all with positive effects for all 3 options. The Housing Topic Paper & the HEDNA discuss the possibilities for a new Policy on Co-Living – and this is likely to encourage safe social connectivity and could encourage community participation – all particularly for the younger people who would be interested in this form of housing – positive effects for all 3 options. Thus extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs. The majority (66.6%) of Coventry's total population is White British, such that Coventry has a notably higher percentage of ethnic minority groups compared to the regional and national averages[48]. However, over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background in 2021. There are many factors that may be contributing to the changing ethnic composition, such as differing patterns of ageing, fertility, mortality, and migration – and it is not clear how policies for new homes can support inclusivity for such groups in communities. **SA Suggestion**: Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups and can the new development plan contribute to encouraging more social inclusivity for these groups?			

[48] (ONS, 2021) https://www.coventry.gov.uk/facts-coventry/population-demographics

2: To provide accessible essential services and facilities for all residents	As communities grow and change, the provision of, and access to, community and social facilities and services, needs to be maintained and improved for social and health wellbeing. This includes access for all to Green Infrastructure [and this is discussed further in SA No 11 Nature & Biodiversity]. It could be asserted that the higher figures of new homes, as in Option 1, could have more negative effects as the higher quantum of new development could overload the capacity of services & facilities for residents. However, larger scale developments may be better able to support provision of new services & facilities. It is likely that the lower quantum of new housing in Option 3 is less likely to overload the capacity of services & facilities with less negative effects and overall more likely positive effects. The location of new development is guided by specific policies – and these consider accessibility to physical, social & green infrastructure – including sufficient mitigation measures to ensure that services & facilities are sufficient, for example, Policy IM1 Developer Contributions. Policy H2 lists housing allocations that have been assessed & identified to be In suitable locations, including for provision of, and accessible, services & facilities, including sustainable/active transport, social & community facilities, education & training, and green infrastructure. The review will update these policies. Policies C1-3 specifically address communities. **SA Suggestion**: Policy review could consider encouraging facilities that are adaptable to future changes in population demographics and technology. It could encourage & support people to lead healthy & active lives, and ensure that facilities are accessible to all groups, including those with physical or mental disabilities.	+	+	++
3: To improve health & promote active living	As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified by the JSNA[49] to give appropriate support to each group to improve health and wellbeing for all rates. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. The Index of Multiple Deprivation (IMD)data (2019)[50] 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	+?	+?	+

[49] https://www.coventry.gov.uk/facts-coventry/joint-strategic-needs-assessment-jsna
[50] https://coventry-city-council.github.io/imd/2019/

	north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west. Inequalities in health arise out of inequalities in society. Coventry became a Marmot City[51] in 2013 and is committed to reducing inequality and improving health outcomes for all. In 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. There are complexities of planning for health due to the multiple determinants and the need for cross-sectoral understanding and collaboration with linkages between the global ecosystem, the natural and built environments, the local economy with communities, people, and their lifestyles. Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[52]. These factors are covered by the following SA Nos 4 & 5. Overcrowding is more likely to be experienced by minority ethnic groups[53] – and this might occur as a result of multiple generations of a family living in one home. There can be reduced isolation but there are health risks associated with overcrowding. Provision of identified need through appropriate density & quality can help resolve such an existing sustainability problem. It could be asserted that higher figures of new homes could have more positive effects as more new homes could be available to more people. However, the effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Overall, some uncertainties of significance of effects.			

[51] https://www.coventry.gov.uk/policy-1/coventry-marmot-city
[52] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[53] The Marmot Review 10 Years On (February 2020) https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

	The extant Local Plan includes site allocations (H2 Housing; JE2 Employment Land) and other policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update policies. Through Policy HW1 of the current Plan, applicants are required to mitigate against potentially negative health impacts. The Health Impact Assessment SPD[54] provides information and guidance on completing the relevant health toolkit and HIA. This is a proactive approach in plan-making and provides mitigation to ensure that there are no negative effects on health from new development. **SA Suggestions**: Can the Plan consider reducing deprivation with particular regard to deprivation pockets in Coventry, thus supporting the targeted approach identified by the JSNA? Policies addressing the ageing population could consider adaptability & improving resilience (both physical & cognitive) for housing the elderly. Can design principles or requirements create safer neighbourhoods & help reduce crime, including violence – especially against women and girls? Are there particular issues for health & overcrowding, perhaps associated with ethnic minority groups?			
4: To provide decent and affordable housing for all	New demographic projections have been modelled recently (HEDNA 2022)[55] to estimate the amount and type of housing that will be needed over the period to 2041. The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Self-build and custom housebuilding[56] is a growing sector of the housing market, and one which has potential to contribute to housing delivery. There is also the potential for co-living[57] to be considered. It is understood that there is a sizeable amount of student accommodation in Coventry which provides the potential to reduce the number of students in the wider housing market.	**+?**	**++?**	**++**

[54] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[55] https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna
[56] https://www.gov.uk/guidance/self-build-and-custom-housebuilding
[57] For example, please see https://coliving.com/what-is-coliving

	It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in Options 1 & 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – and therefore, uncertainties for significance of effects for Options 1 & 2. However, according to recent initial capacity studies, Option 3 could deliver the identified need for housing indicating major positive effects for housing objectives. Therefore, positive effects likely for all three options but uncertainties of significance for the higher quanta of housing numbers. Further capacity studies will be undertaken as the review of the CLP progresses. Whilst delivery has not been an issue for the Council[58], there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 & 2, and to meet with other objectives, particularly for climate change & biodiversity. The city has tight boundaries and constrained opportunities to grow within them, such that the Council will continue to work closely with its neighbouring authorities for shared opportunities. Therefore, uncertainty of significance of positive effects for Options 1 & 2. In 2020/21[59] the delivery of affordable housing was below the annualised need (although an increase in percentage from 7 to 13 % on 2019/20), and the updated policies will need to take this into account. As PBSA schemes are built, Homes in Multiple Occupation (HMOs) will potentially become available for the wider housing market. It is important to address any imbalance in the distribution of affordable housing. Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups.			

[58] See AMR 2021/22 https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22
[59] https://www.coventry.gov.uk/downloads/file/37391/authority-monitoring-report-2020-2021

	The Affordable Housing SPD (March 2022)[60] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built – all with likely major positive effects. The need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes. Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards (and see later SA No 6 Net Zero Carbon & SA No 7 Resilience to Climate change). **SA Suggestion**: Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups?			
5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The evidence so far indicates that employment need could be met from renewal of existing sites and redevelopment[61]. The HEDNA (Nov 2022) considered population, housing growth and the economy in tandem based on the 2021 census figures. Taking into account the initial capacity studies, it seems that Option 3 could be accommodated, indicating minor positive effects for employment objectives but with some uncertainty of significance at this stage until more studies are undertaken. It is not clear at this stage whether the higher quanta of housing in Options 1 & 2 could be accommodated due to the constraints within the Coventry boundary. These options could require re-allocation of some employment land and/or result in increased commuting for work (with further implications for other SA objectives, such as transport). It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working & hybrid working, will affect requirements for employment land during the plan period.	**--?**	**-?**	**+?**

[60] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

[61] https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna

6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[62]. 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. All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions. Following consultation in 2023, Government intends to publish the Future Homes Standard (FHS) in 2024 and then bring it into force in 2025. All new homes will then be 'zero carbon-ready', meaning that they will be zero carbon - once the electricity grid has been decarbonised[63],[64]. The UK has committed to decarbonise the electricity system by 2035[65] and the updated policies in the CLPR will reflect this commitment in consideration of the plan period to 2041. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, as well as those that encourage active travel through location of new development in sustainable locations with sustainable transport – Policy AC1 Accessible Transport & Policy H1 Allocations, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan). Since all new development will need to meet requirements from updated policies, it is likely that there will be no significant negative effects for all 3 housing options – in the longer term, after 2035. Assuming that the required zero carbon trajectory can be achieved, positive effects for climate change objectives are indicated in the longer term. However, there is some uncertainty that the higher quanta of housing in Options 1 & 2 would be able to meet with the enhanced requirements to meet with net zero carbon – particularly in the shorter term. Viability/costs may also be an issue in the shorter term as the construction industry develops new methods. The Council's Energy SPD[66] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements. The Council is also investigating how it could establish challenging new targets/standards, including consideration of standards	**+?**	**+?**	**+**

[62] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy
[63] https://www.futurehomes.org.uk/delivery-at-scale
[64] https://www.benuk.net/Decarbonising-the-Grid.html
[65] https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035
[66] Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

	higher than Building Regulations, in order to support Coventry's aspirations for addressing the climate change crisis. There is a perception that new building reduces carbon emissions when operational compared to an existing building. However, new buildings incur high carbon emissions from embodied carbon associated with the extraction of raw materials, transport & construction. The VAT levy on new builds at 0-5% compared to 20% for refurbishment is a disincentive for refurbishment. However, refurbishment of buildings is likely to be delivered in a shorter time than new build. High quality refurbishments can inspire as much as new buildings with appropriate design and reuse of buildings can include historic assets – a particular issue for Coventry and with positive effects. **SA Suggestion**: Circular economy principles[67] for buildings should be considered for inclusion in the updating of policies so that embodied carbon and whole life assessment are requirements for development proposals.			
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[68] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Relevant current policies in the adopted Local Plan include, Policy EM1 Planning for Climate Change Adaptation, Policy EM2 Building Standards, Policy GE1 Green Infrastructure, Policy EM4 Flood Risk Management, and Policy EM5 Sustainable Drainage Systems – and all these will be reviewed & updated. There is some uncertainty that the higher quanta of housing in Options 1 & 2 would be able to meet with the enhanced requirements to build resilience from overheating, flood risk, and extreme weather effects due to the constraints – suitable land & viability (and particularly in the shorter term until technology catches up with requirements & the construction sector can meet with increased needs). Increased densification may increase the urban heat island effect.	**-?**	**-?**	**+**

[67] For example, please see RIBA, 2021 https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545
[68] For example, see https://earth.org/climate-change-in-the-uk/

	Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with negative effects – therefore, minor negative effects for Options 1 & 2 that will be cumulative in the longer term, but uncertainties of significance at this stage of assessment.			
8: To reduce traffic & improve sustainable transport choices	A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. The Council has aimed to locate new development in sustainable locations – identified through their proximity and accessibility to sustainable transport choices – and reflected in the site allocations in the adopted Plan. This principle will be retained in the review of the policies and will apply to all new development. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options. The Environment Improvement Plan[69] for England includes an aim for half of all journeys in cities to be cycled or walked by 2030 & Coventry's Transport Strategy[70] aims to significantly improve conditions to encourage more people to walk and cycle. It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1. There is considerable uncertainty about the delivery of the higher quantum of housing in Option 1 due to the boundary constraints and limited amount of sustainable transport locations, albeit that the urban parts of Coventry are generally well connected. Therefore, potential for major negative effects with Option 1. The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quantum of housing in Option 3 is less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated.	**--?**	**-?**	**0?**

[69] https://www.gov.uk/government/publications/environmental-improvement-plan
[70] https://www.coventry.gov.uk/transport-strategy-2/transport-strategy

	Where there is a deficiency in public & sustainable transport, it is generally considered that larger developments, particularly in rural areas, are able to provide & encourage sustainable transport choices as part of an overall package of masterplanning & developer contributions. Coventry is constrained by boundaries and various other factors, including Green Belt (and see SA No 13); however, the urban environment is well connected and with a good transport system. Nonetheless, it is considered that the higher quanta of housing with such overall development pressures could challenge the capacity of public & sustainable transport, and open/green spaces, with potential negative effects. The lower quantum of housing that has been calculated (HEDNA, 2022) with urban capacity may facilitate a shift in transport mode to more sustainable options with negligible or neutral effects. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked & more extensive. However, uncertainties of significance at this stage of assessment. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11). There may also be an issue from transport and air quality for nitrogen deposition and negative effects on biodiversity and nature sites (see SA No 11) **SA Suggestions**: Consider revision of policy to include restricted parking & zero emission zones Consider whether more areas of road space would be safe & appropriate for reallocation to cycling & walking – particularly in areas that would link/extend sustainable transport networks. Reuse/refurbishment of existing buildings, including historic assets (and see SA No 12) Consider higher densities in key sustainable locations that meet other Plan objectives			
9: To reduce air, noise & light pollution		**0?**	**0?**	**0?**

	In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health[71]. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem[72]. Noise pollution is an acknowledged issue for human health & wellbeing – physical & mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem in Europe[73] & the UK[74]. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. Socially deprived groups & groups with increased susceptibility to noise may suffer more pronounced health related impacts of noise. Future urban growth and increased demand for mobility is likely to increase the numbers of people exposed to high levels of noise. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress & anxiety[75] (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects. Some uncertainty at this stage of assessment about the effectiveness of mitigation for potential cumulative effects. **SA Suggestions**: Continue to focus on reducing vehicle use to help reduce air pollution Consider the implications of environmental noise for particularly sensitive social groups Consider the implications of light pollution explicitly in building design & including the indoor environment			

[71] OHID (updated Feb 2022) Air Pollution: applying All Our Health https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health
[72] Chief Medical Officers' annual report 2022: air pollution https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/
[73] EEA, 2020 https://www.eea.europa.eu/publications/environmental-noise-in-europe
[74] For example, please see Karen Bakker (January 2023) Noise Pollution is a menace to humanity https://www.theguardian.com/commentisfree/2023/jan/03/noise-pollution-is-a-menace-to-humanity-and-a-deadly-threat-to-animals
[75] For example, please see https://www.darksky.org/light-pollution/human-health/

	Consider cumulative effects Consider the implications of air, noise & light pollution for nature & biodiversity						
10: To protect & conserve natural resources – soil, water, minerals & waste[76]	The vast majority of development completions (90%) in 2021/22[77] were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP will recommend that priority is given to continuing to build on PDL where effectively located. Policy EM6 Redevelopment of Previously Developed Land provides mitigation to conserve natural resources indicating negligible effects for all 3 options. However, with the updating of polices to meet with new requirements, especially those for climate change & sustainable movement, there may be insufficient suitable PDL to meet with the higher quanta in Options 1 & 2 – indicating potential minor negative effects for Option 1 and for Option 2, although with some uncertainty at this stage. The best agricultural land must be conserved and effects of climate change may affect food security. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The cumulative effects of the higher quanta of housing may incur minor negative effects but with some uncertainty at this stage. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1. **SA Suggestions**: The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place Are there sufficient allotments for any increasing need? Are there sufficient facilities that recycle and recover value from waste?	-	0?	-?	0	0	0

[76] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[77] https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22

11: To protect and enhance nature & biodiversity	It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain[78]. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures aiming for no major significant negative effects. However, the higher quanta of housing in Options 1& 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain as land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects indicated. The initial capacity studies have suggested that there could be capacity in the city for the quantum in Option 3 and therefore, likely negligible or neutral effects. Overall, some uncertainties of significance of effects as depend upon locations, densities and any possibilities for sufficient offsite measures. **SA Suggestions**: Need to consider any issues from transport & air quality for nitrogen deposition on nature sites Increasing density of housing in suitable locations could take the loading off land availability Need to consider wider water network for quality, flows and any functionally linked watercourses with a longer term aspiration to restore connectivity by removing barriers	**--?**	**-?**	**0?**
12: To protect and enhance the historic	Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the	**-?**	**0?**	**0**

[78] Biodiversity Metric 4.0 (JP039) 2021 https://publications.naturalengland.org.uk/publication/6049804846366720

environment, and its setting	population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting. The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. However, the quantum of housing in Option 1 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. Whilst the amount of development is reduced in Option 2 and effects towards negligible or neutral might be indicated, there is still some uncertainty of cumulative effects that will depend on location. The reduced quantum of housing in Option 3 indicates that there is more capacity in the City to accommodate the change and with strong policies in place, likely effects will be reduced to neutral/negligible. The historic environment is closely interwoven with townscape & good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context/setting. Historic England recognises the need for urgent action & is committed to achieving net zero carbon; HE suggests that reusing the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions[79]. **SA Suggestions**: Increasing density of housing in suitable locations could take the loading off land availability & risks of negative effects for historic environment Reuse/refurbishment of older buildings is indicated as being more likely to progress to net zero carbon – but energy efficiency during operation may be an issue Are there areas of the city that have changed significantly with changing population such that the local value & importance has changed? Are there opportunities with the review to focus on protecting heritage assets at risk? Are there opportunities to resolve existing problems with the historic environment & enhancing access/context/setting?			

[79] Historic England (March 2022) https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/

	Consider proactive support for reuse of buildings pre 1919 with suitable energy improvements			
13: To protect and enhance the quality and character of townscapes & landscapes	It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The Coventry Green Belt[80] remains an important mechanism to prevent urban sprawl, safeguard countryside, and preserve the setting and special character of historic towns – such as Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. This was a significant issue during preparation of the current Plan & Coventry's exceptional circumstances were acknowledged. Policy GB1 Green Belt will be updated but the issue of constraints to high levels of new development remain and with particular adverse effects on Green Belt and the quality and character of town and countryside areas, including the closely woven historic environment. Climate change and population growth are exacerbating environmental issues in urban areas. The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure[81]. Therefore, it is vital that space for green & blue infrastructure is retained & enhanced, including improvements to linkages & networks that will further benefit people & nature. Significant negative effects are likely for Options 1 & 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded & other mitigation measures in the design process. Mitigation measures, such as for design, location and offsetting, are likely to be effective for the lowest quantum of housing as capacity has been indicated in Option 3. New development that is high quality, creative & proportional to the receiving townscape & local environment can have very positive effects, and also act as a catalyst for further	**--?**	**0?**	**+?**

[80] https://www.coventry.gov.uk/directory-record/45418/green-belt-land and see also: https://www.coventry.gov.uk/downloads/download/4073/evidence_base_-_coventry_and_warwickshire_joint_green_belt_review_2015

[81] Environment Agency 2021 The State of the Environment: the urban environment https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment

	enhancement of quality and human wellbeing to the built environment. Therefore, positive effects are likely for Option 3 as it has been indicated by the initial capacity studies that such housing numbers can potentially be accommodated within the urban area. Some uncertainty at this stage as significance will depend on location & design, mitigation possibilities. **SA Suggestions**: Consider highest design & for reuse/refurbishment to avoid landtake & new build Consider higher densities in suitable, sustainable locations Require highest quality design principles & approach consistent with Coventry aspirations			

Appendix IIIb: Options for Residential Density	
1	Greenfield 30 dph[82]; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations

		Options for Density	
Sustainability 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**	**1. Outside ring road minimum 35 dph**	**2. Outside ring road >35 dph in certain locations**
1: To enable vibrant and inclusive communities	The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land. The Council is investigating possibilities for increasing residential density outside the ring road in certain locations – to help meet with the increased need identified for housing development. It may	**0?**	**+**

[82] Dwellings per hectare

	be noted that there has been both praise and criticism for the ring road and its role in facilitating traffic movement, its complexity and being difficult to navigate, and forming a barrier between the city centre and its suburbs[83]. However, a series of poetry films[84] was used as part of Coventry's successful bid for status as UK city of Culture 2021. Thus, there are particular functions and characteristics associated with the ring road and these may influence nearby communities. High density places have been associated with sustainable outcomes but there is a risk of less interaction and building fewer relationships in such environments. However, for example, recent research[85] has investigated the delivery of award winning high density (250 dph) development in London and identified design factors that influence social interactions. Therefore, it is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms with appropriate standards such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road. There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), & promoting higher densities will better protect & conserve natural resources (SA No 10 soils). There is some uncertainty about whether the extant density arrangements will be able to accommodate the increased housing requirements. **SA suggestions**: Identify locations outside ring road where connectivity to the city centre could be optimised Consider recent experiences & research in England on the social implications of higher density development to inform potentially suitable dph & likely building design that would be appropriate for Coventry.		

[83] For example, please see Beanland, Christopher (The Guardian, 4 March 2017) https://www.theguardian.com/cities/2017/mar/14/brutal-inspiration-why-poets-are-writing-about-coventrys-ring-road, and Jenny Scott (BBC News, 5 April 2014) Are these the worst ring roads in England? https://www.bbc.co.uk/news/uk-england-26036572 and (BBC News,16 March 2017) Coventry ring road inspires verse amid city of culture bid https://www.bbc.co.uk/news/av/uk-england-birmingham-39298399

[84] *Disappear Here* project funded with grants from Coventry City Council & Arts Council England

[85] Mellan H & M Short (UCL, 30 January 2023) Designing for social interaction in high density housing; a multiple case analysis of recently completed design-led developments in London https://www.frontiersin.org/articles/10.3389/frsc.2022.1043701/full

	Is there scope to consider 250 dph inside the ring road and as has been implemented through planning policy in London & where sustainable deliverables have been reported[86]?		
2: To provide accessible essential services and facilities for all residents	It is unclear whether the current approach to residential densities would actually be able to accommodate the identified housing needs. Capacity studies will inform the implications for provision of services & facilities - and mitigation measures will be proposed through updating of relevant policies (current CLP Policies AC1-7) such that there should be no significant adverse effects are likely. If locations are identified outside the ring road where accessible essential services & facilities are available & with capacity, there will be negligible or neutral effects for Option 2. Some uncertainties as effects will depend on overall quantum of housing confirmed and locations.	**0?**	**0?**
3: To improve health & promote active living	Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities[87]. It is unclear whether the current approach to residential densities would be able to accommodate the identified housing needs. However, capacity studies and mitigation measures provided through other policies, including in particular CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, indicate that there will be no significant negative effects through the current approach to densities. Since the provision of good quality housing is known to have positive effects on health & wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects. **SA Suggestions**: Identify the relevant & appropriate densities for Coventry, seeking to reduce health inequalities by aligning housing with regard to areas of deprivation Ensure that proposed densities have taken into account building design requirements that create safety & help reduce crime; promote active living	**0?**	**+?**

[86] For example, please see Lessons from Higher Density Development https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf and LSE (2020) Living in a Denser London https://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/2020-LSE-Density-Report-digital.pdf
[87] For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery and The Marmot Review 10 Years On (February 2020) https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

	Higher densities may be suitable for the ageing population & design requirements will need to consider physical health & mental wellbeing to improve resilience Higher densities may be suitable for coliving		
4: To provide decent and affordable housing for all	Overcrowding, poor housing conditions, and affordability problems have increased in recent years[88]. It is unclear whether the current approach to residential densities would actually be able to accommodate all the identified housing needs but it would progress provision such that positive effects are indicated for Option 1, with some uncertainty of significance at this stage of assessment. If ensuring that needs, including suitable mix & tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2.	+?	++
5: To support sustainable inclusive economic growth	Options for housing densities will not directly affect objectives for economic growth and therefore, neutral effects for SA No 5.	0	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions as set out in Coventry's draft Climate Change Strategy. . Therefore, neutral effects for SA No 6.	0	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Therefore, neutral effects for SA No 7.	0	0
8: To reduce traffic & improve sustainable transport choices	The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road & where there is good accessibility & capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed.	0	0

[88] For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery and The Marmot Review 10 Years On (February 2020) https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

9: To reduce air, noise & light pollution	In the UK, air pollution has been recently reported as being the largest environmental risk to public health[89]. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem[90]. The Coventry Air Quality Action Plan[91] includes commitments to improve air quality that involve improvements for pedestrians and cyclists to and from the city centre – and this will improve sustainable connectivity through the ring road. For example, this might help identify those locations near the ring road where a higher residential density could be appropriate and help facilitate further connectivity between the city centre and suburban communities – with positive effects – and helping to resolve an existing sustainability problem. Noise pollution is an acknowledged issue for human health & wellbeing – physical & mental - (and also certain biodiversity see SA No 11), and particularly road traffic noise remains a major problem in Europe[92]. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. As housing density increases, potential risks to health and wellbeing by noise from neighbouring activities and the wider environment (especially road traffic) is likely to increase. However, building design requirements[93] with acoustic separation & sound insulation can ensure that mitigation measures are implemented to acceptable levels/effects. Similarly, good quality design of buildings & their location can reduce the implications for light pollution on health & wellbeing. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia stress & anxiety[94] (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design & materials resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for both options. **SA Suggestions:**	**0**	**0**

[89] OHID (updated Feb 2022) Air Pollution: applying All Our Health https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health
[90] Chief Medical Officers' annual report 2022: air pollution https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/
[91] https://letstalk.coventry.gov.uk/improvingaq Ring Road Junction 7
[92] EEA, 2020 https://www.eea.europa.eu/publications/environmental-noise-in-europe
[93] For example, please see https://www.bregroup.com/bretrust/wp-content/uploads/sites/12/2019/02/Acoustic-design-and-testing-Trust-report-online-version-1.pdf
[94] For example, please see https://www.darksky.org/light-pollution/human-health/

	Ensure that updating of environmental management policies considers highest design requirements to reduce potential air, noise & light pollution Continue to reduce the need to travel by vehicles & discourage car use				
10: To protect & conserve natural resources – soil, water, minerals & waste[95]	Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification & location.	-	0	++?	0
11: To protect and enhance nature & biodiversity	The scale of new development needed is likely to have strong pressures on green infrastructure (GI) & biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained & with such importance for protecting spaces for GI & biodiversity. Possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification & location.	-?		++?	
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities.	0		0	
13: To protect and enhance the quality and character of townscapes & landsapes	It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics & different possibilities for accommodating changes through increased development. High quality & proportionate new development can enhance the townscape & local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be	0?		+?	

[95] First cell refers to land/soil & water resources; second cell refers to minerals & waste

	taken from other places; with high quality design, positive effects could be indicated but with uncertainty at this stage of assessment. **SA Suggestions**: Consider highest design possibilities & including for reuse/refurbishment to resolve existing sustainability/townscape issues		

IIIc: Options for progressing Coventry's Climate Change Strategy[96]	
1	Planning policy requirements in line with national Future Homes Standard[97] & Future Buildings Standard[98] covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

		Options for Climate Change	
Sustainability 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**	**1. In line with FHS & FBS**	**2. Over & above Building Regulations**
1: To enable vibrant and	Other factors are more likely to have potential effects on objectives for inclusive communities than requirements in line or above Building Regulations.	**0**	**0**

[96] Coventry's draft Climate Change Strategy 2023-2030 https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy
[97] For example, please see: https://www.futurehomes.org.uk/delivery-at-scale
[98] https://www.gov.uk/government/consultations/the-future-buildings-standard

inclusive communities			
2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than requirements in line or above Building Regulations.	**0**	**0**
3: To improve health & promote active living	An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health & wellbeing by better reducing the risks to health. Climate change affects the social & environmental determinants of health - clean air, safe drinking water, sufficient food & secure shelter[99]. Reducing emissions of greenhouse gases through better transport, food and energy-use choices can result in improved health, particularly through reduced air pollution. There is some interpretation of data suggesting that achieving net zero emissions by 2050 *will not be enough to ensure a safe future for humanity*[100]. Any consequence of climate change that can bring physical ill health can also have mental health implications & climate change can negatively impact on mental health, including depression and anxiety. These factors may need more consideration in the future, but clear actions to mitigate climate change can positively influence mental health[101]. Aligning with Government requirements may be considered to have negligible but uncertain effects for health & wellbeing. However, by requiring standards over & above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner & will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical & mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.	**0?**	**++?**

[99] WHO (October 2021) https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health
[100] For example, please see CCAG as reported by IEMA (August 2021) https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn
[101] UCL (July 2021) https://www.ucl.ac.uk/bartlett/news/2021/jul/climate-change-and-mental-health

SA No 4: To provide decent and affordable housing for all	There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials[102]. Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design & building – and particularly construction – such that costs & viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon & implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling.[103] With commitment & creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain & unknown at this stage.	**0?**	**?**
5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21st century[104], and the recently published Net Zero Growth Plan (March, 2023)[105] continues to claim new opportunities to grow green jobs. Coventry has strong commitments for innovation, research & development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations. Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts[106] - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.	**0?**	**+?**

[102] For example, please see https://www.environmentalleader.com/2022/02/uk-construction-industry-cites-these-barriers-to-net-zero-emissions/
[103] For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545
and BRE https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/
[104] https://www.gov.uk/government/news/net-zero-review-uk-could-do-more-to-reap-economic-benefits-of-green-growth
[105] DESNZ (March, 2023) https://www.gov.uk/government/publications/powering-up-britain
[106] https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought

6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[107]. 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. Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019[108]. It has been reported that the construction industry needs to decarbonise more urgently[109] and building design needs to progress principles in the circular economy. There is some interpretation of data suggesting that achieving net zero emissions by 2050 "*will not be enough to ensure a safe future for humanity*"[110]. Implementation of planning policy requiring higher standards to reduce GHG emissions sooner than national requirements will have major positive effects towards helping the Council achieve its ambition for dramatic reduction of carbon emissions, as set out in the Coventry draft Climate Change Strategy but with uncertainties of significance at this stage.	**0?**	**++?**
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[111] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Implementation of planning policy requiring higher standards, including reducing GHG emissions sooner than national requirements, will contribute to building resilience to climate change sooner with likely positive effects but some uncertainty of significance.	**0?**	**+?**
8: To reduce traffic & improve	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles[112].	**0**	**0**

[107] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy
[108] UK Climate Change Committee https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf
[109] For example, please see RAEng 2021 https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers
[110] For example, please see CCAG as reported by IEMA (August 2021) https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn
[111] For example, see https://earth.org/climate-change-in-the-uk/
[112] https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022

sustainable transport choices	Changes to Building Regulations will not affect this SA objective and therefore, neutral/not applicable effects.				
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable	0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste[113]	With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset & government has indicated that managing soil carbon could form a part of net zero plans[114]. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil & water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented & become effective. Therefore, uncertain negative effects for Option 1. Planning policy requirements that are over & above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils & water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options. Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards as in Option 2, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.	-?	0	0?	+?

[113] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[114] UK Horizon scanning (April 2021) https://post.parliament.uk/soil-as-an-essential-national-asset/

11: To protect and enhance nature & biodiversity	The need for addressing biodiversity loss & climate change issues together is being increasingly recognised[115]. Climate change can contribute to biodiversity loss & biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate & adapt to climate change without Nature-Based Solutions[116]. It could be considered that meeting the proposed national standards for building regulations & reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be some positive effects for nature & biodiversity – but uncertainty as depends upon quantum of new development & extent of associated biodiversity gain.	**0?**	**+?**
12: To protect and enhance the historic environment, and its setting	Historic England recognises the need for urgent action & is committed to achieving net zero carbon; HE suggests that reusing the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions[117]. The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be less risk of negative effects on the historic environment – but uncertainty as depends upon extent of development & location.	**0**	**+?**
13: To protect and enhance the	The national design guide (2019)[118] sets out the characteristics of well-designed places & includes consideration of minimising carbon emissions. Circular economy principles in building design[119] will	**0**	**0?**

[115] For example, please see UK Parliament Post (Feb 2020) https://researchbriefings.files.parliament.uk/documents/POST-PN-0617/POST-PN-0617.pdf and NE (April 2020) Climate Change Adaptation Manual (NE751) https://publications.naturalengland.org.uk/publication/5679197848862720
[116] Defra (January 2023) Environmental Improvement Plan 2023 https://www.gov.uk/government/publications/environmental-improvement-plan
[117] Historic England (March 2022) https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/
[118] https://www.gov.uk/government/publications/national-design-guide
[119] For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/

quality and character of townscapes & landscapes	contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape. The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, including consideration of climate change. These will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design & construction, particularly in the shorter term, if requirements over & above such standards are proposed and thus with some uncertainty of significance.		

IIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG)[120], and Green Infrastructure (GI[121]) standards[122]
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

The recent Environmental Improvement Plan (January, 2023)[123] for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home. The Green Infrastructure Framework (GIF, Feb 2023)[124] provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across England. The framework integrates green infrastructure tools, principles, standards and design guidance. It is structured by five key standards:

- Urban Nature Recovery Standard – including trees & wildflowers to increase carbon capture, prevent flooding, & reduce temperatures during heatwaves
- Urban Greening Factor (UGF) – approximately 40% of residential developments to have green & blue spaces, green roofs or green walls
- Urban Tree Canopy Cover Standard – increase tree canopy cover in urban environments
- Accessible Greenspace Standards - promote access to good quality green and blue space within 15 minutes' walk from home
- Green Infrastructure Strategy - delivery plans to support creation and enhancement of new and existing greenspace

[120] Environment Act 2021, and for example, please see https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/
[121] Includes both green and blue (water-related) infrastructure
[122] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx
[123] Defra (January 2023) Environmental Improvement Plan 2023 https://www.gov.uk/government/publications/environmental-improvement-plan
[124] Natural England, Feb 2023 https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework

		Options for Nature & Biodiversity	
Sustainability 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**	**1. In line with national requirements & standards for BNG & GI**	**2. Over & above national requirements for BNG & GI**
1: To enable vibrant and inclusive communities	The provision & accessibility of GI can encourage safe social connectivity & help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives & that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.	**0**	**0**
2: To provide accessible essential services and facilities for all residents	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects – that are likely to be synergistic & cumulative, particularly in the longer term.	**+**	**++**
3: To improve health & promote active living	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects for health & wellbeing, both physical & mental. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for health & wellbeing – that are likely to be synergistic & cumulative, particularly in the longer term.	**+**	**++**

	Coventry has been a Marmot City[125] since 2013 & there has been progress in outcomes across health & society. The Marmot Review[126] in 2020 on health equity in England highlighted that the health gap has grown between wealthy & deprived areas, people can expect to spend more of their lives in poor health, improvements to life expectancy have stalled, and that place matters. Enhancing GI is only one factor that contributes to improving health & wellbeing. However, a requirement to meet standards for GI over & above national proposals would demonstrate further strong commitment to Marmot principles & support for the multisectoral & partnership approach in the city. The visible greening of the urban areas could further encourage people in active living with positive effects for health & wellbeing. **SA Suggestions**: Align opportunities for enhancing GI network in most deprived areas & where health inequity could be most reduced		
4: To provide decent and affordable housing for all	Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all. It is vital that the appropriate mix & tenure of housing, suitable for different housing needs of different people & at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI & in locations where it may better support nature & people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people & climate change. This is a particular challenge for Coventry with its boundary & other constraints. It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum & location of development with uncertainties at this stage of assessment.	**+?**	**+?**
5: To support sustainable	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people.	**0?**	**0?**

[125] https://www.coventry.gov.uk/policy-1/coventry-marmot-city
[126] https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

inclusive economic growth	The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure[127]. Whilst improvements to GI will enhance the local environment for residents, workers & visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.		
6: To help achieve the Council's ambition to reach net zero carbon emissions	The GI Standards aim to improve resilience to & mitigation of climate change, including increasing carbon capture, and with positive effects towards reaching dramatic reduction of carbon emissions, as set out in Coventry's draft Climate Change Strategy. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for reducing GHG emissions – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.	+	++?
7: To build resilience to climate change	The GI Standards aim to improve resilience to & mitigation of climate change, including preventing flooding, and reducing temperatures during heatwaves, and with positive effects towards building resilience to climate change. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for resilience – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.	+	++?
8: To reduce traffic & improve sustainable transport choices	Improving the sustainable transport network for cycling & walking can be integrated with the GI network for mutual benefits for nature & people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.	0	0

[127] Environment Agency 2021 The State of the Environment: the urban environment https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment

9: To reduce air, noise & light pollution	Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) & vegetation, including green roofs & wall systems act as sound insulation. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for reducing air & noise pollution – that are likely to be synergistic & cumulative, particularly in the longer term. Uncertainties for significance at this stage of assessment.	+	++?
10: To protect & conserve natural resources – soil, water, minerals & waste[128]	Provision of GI – both green & blue – will contribute to protecting & conserving the natural resources of soils & water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects. It is not clear how differences in GI standards will directly affect sustainability objectives for waste & minerals – likely negligible effects for both options.	+ 0	++ ? 0
11: To protect and enhance nature & biodiversity	Provision of GI – both green & blue – will contribute to protecting & enhancing nature & biodiversity with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of nature & biodiversity but there is uncertainty for the significance of the further positive effects.	+	++?
12: To protect and enhance the historic environment, and its setting	It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.	0	0
13: To protect and enhance the quality and character of townscapes & landscapes	Provision of GI – both green & blue – will contribute to protecting & enhancing the quality & character of townscapes & landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of townscapes & landscapes but there is uncertainty for the significance of the further positive effects.	+	++?

[128] First cell refers to land/soil & water resources; second cell refers to minerals & waste

EQUALITY IMPACT ASSESSMENT (EIA)

Coventry City Council

Title of EIA		Local Plan Review Issues and Options
EIA Author	Name	Clare Eggington
	Position	Planning Policy Manager
	Date of completion	09/06/2023
Head of Service	Name	Chris Styles
	Position	Head of Planning Policy & Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities

EIA
- Having identified an EIA is required, ensure that the EIA form is completed as early as possible.
- Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities), Lisa Young (Health Inequalities), Laura Waller (Digital Inclusion).

Sign Off
- Brief the relevant Head of Service/Director/Elected Member for sign off
- Have the EIA Form ready for consultation if it is required
- Amend according to consultation feedback and brief decision makers of any changes

Action
- Implement project / changes or finalise policy/strategy/contract
- Monitor equalities impact and mitigations as evidence of duty of care

PLEASE REFER TO EIA GUIDANCE FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

☐New policy / strategy
☐New service
☒Review of policy / strategy
☐Review of service
☐Commissioning
☐Other project *(please give details)*

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1.2 In summary, what is the background to this EIA?

The Local Plan (including Coventry City Area Action Plan) was adopted in December 2017. Local Plan policies need to be reviewed once they are five years old to see whether they are still up to date. A full review of the Local Plan has commenced. The reviewed plan has to go through a statutory planning process which ultimately leads to the plan being examined in public by an independent Planning Inspector. This is an initial EIA of the issues being raised at the starting point of the review ('Regulation 18' , or'Issues and Options') where we consider what policies might need updating, and any impacts which will need to be considered as the process of the review moves forward. We need to publicly consult on our initial views before producing final policy wording (which will be independently examined) The Local Plan covers a wide range of topics including health, levels and type of growth, jobs and economy, housing, town centres, communities, environment, design, heritage, transport and accessibility, environmental management, infrastructure.

At this stage of the plan review it is not possible to undertake detailed Equality Impact Assessment of each policy as we are gathering evidence and feedback on where we feel policies may need updating or where new policy may be needed (eg due to changes in national policy or local priorities). We will review responses after this initial consultation and this will include any feedback on equality and health impact matters which will need to be considered as the plan develops. Therefore this EIA and HIA provides a high level initial overview to help stimulate debate. The process of EIA and HIA and has been undertaken in discussion with the equalities and public health teams.

Overs a wide range of topics

1.3 Who are the main stakeholders involved? Who will be affected?

The local community and those delivering services in the area, landowners, developers and agents, special interest groups and organisations.

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Policy Service

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to https://www.coventry.gov.uk/factsaboutcoventry)

The data analysis for the local plan has been prepared through a range of evidence base documents, for example:

- Housing and Economic Develoment Needs assessment which has been jointly prepared to cover the Coventry and Warwickshire Housing Market Area (HMA), see https://www.coventry.gov.uk/downloads/file/39499/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna- This covers demographic dynamics, overall housing need, affordable housing need, sizes and types of homes needed, specific housing market segments, housing needs of older people and people with disabilities. It uses the 2021 census as well as a range of other data sources.
- Gypsy and Traveller Accommodation Assessment - addresses the specific needs of Gypsies and Travellers, reviews current policies and ensures that the reviewed plan provides for their future needs
- A series of topic papers to inform the review of the policy themes (which refer to a wide range of sources of evidence).
- Sustainability Appraisal

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

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The Local Plan also includes a policy basis for social and community uses, which includes schools, universities and health centres.

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	**P**	The review of the policies includes consideration of family housing provision, including affordable housing. 22.9% of children (0-15) live in relative low income families which is above the national average of 18.5% (2020/21 figures). The review ensures that infrastructure is aligned to development (eg schools, health, open space, walking and cycling networks) and supports the provision and retention of services such as community facilties and takes health issues into account for example healthy and active lifestyles. The review also includes a policy basis for social and community uses, which includes schools, universities and health centres.
Age 19-64	**P**	The review of the policies includes supporting a range of different housing models to meet a variety of needs from people in this age group, including affordable housing, market housing, specialist housing, and a range of different models. How and where new development is located may affect different age groups in varying ways. The accessibility of new development may have implications for some people more than others and some age groups might be impacted more (or less) than others. For example, for older age groups, proximity of new housing and other development to services, such as health and social care, convenience shopping and community facilities may be especially important and/or the means to access these provisions safely and easily via public transport. Conversely, accessing quality jobs, training and education opportunities, as well as establishing a place on the property ladder, is more likely to be a key issue for younger people. Access to pre-school provisions, play areas and healthcare is likely to more important to households with young families. Although all age groups are likely to be impacted, the potential exists for some age groups to be impacted by local plan policies more than others.
Age 65+	**P**	The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include: • A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth;

		• A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems The review of Policy H8 (: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation) considers the need for the growth in housing including sheltered / retirement housing, housing with care, and housing for wheelchair users. The review seeks to combat deprivation on a number of fronts. It looks to respond to growth in jobs within the city and manage any imbalance that may exist between the quality of jobs and housing. As well as planning for new housing growth the review also looks to set a new direction for new employment proposals and supports existing schemes (e.g. Friargate and Coventry gateway). It is also accepted that house building in itself creates jobs both through construction and knock on jobs through the supply chain etc. As such ensuring a varied supply of homes in all parts of the city informed by the HEELA will help spread jobs growth and opportunities. By looking to prioritise development within the existing urban area where possible, the plan also promotes urban regeneration through a previously developed land perspective can help with the removal of derelict and vacant sites that act as a blight within local communities. Instead turning them into sites for new homes or jobs or infrastructure. Indeed the review is proactive in planning for replacement employment land to facilitate urban regeneration and enhance the built environment. As part of the wider infrastructure aspect of the plan, it provides a policy basis for ensuring sufficient community and social provisions are provided alongside new development .This includes schools, community buildings and useable green spaces. It also seeks to ensure new developments are well connected and well integrated with their surroundings in order to help community cohesion.
Disability	**P**	For disabled people, isolation from services, public transport options and/or communities as well as an undersupply of more specialist or flexible types of housing can be a barrier to living independently and to health and wellbeing. There are a wide range of needs within this category, and it is recognised that the review of the Local Plan can play a role in helping to meet specific specialist needs, in providing an accessible, healthy and inclusive communities, open spaces, facilities and a public realm that is appropriate and accessibly for all who want to use them. The review of Policy H8 includes consideration of specialist accommodation needs and explores the possibility of adaptations

		and homes meeting higher building regulations standards where there is evidence of need. In terms of delivering housing the review considers the housing needs of the population as a whole. As part of the HEELA, evidence was developed around housing needs for those with disabilities and this is reflected through the plan and the policies. The accessibility policies are also aimed at including transport and access for all aspects of the population.
Gender reassignment	**ID**	The Equality Act provides protection for transgender people, defined as people who propose to, has started, or completed a process to change their gender. Local Plan policies should seek to respond to the needs of all in the community, avoid discrimination and support inclusivity. No direct impact although a range of policies will be applicable depending on individual / household circumstances
Marriage and Civil Partnership	**ID**	Married or civil partnership couples could potentially face barriers through the size of homes, access to suitable facilities and services. A lack of local economic opportunities could potentially force longer commutes to economic opportunities outside of the city.
Pregnancy and maternity	**ID**	A proportion of the population will be pregnant at any time and/or looking after babies and very young children. They may have health, socialisation and childcare requirements, including around access to pre- and post-natal care, childcare and health services. They may be more likely to be seeking affordable accommodation that is suitable for a young or growing family, with access to facilities, schools, and open spaces (including play areas). These needs have implications for how our environment, infrastructure, housing and communities are planned and are relevant to the review of the Local Plan. No direct impact although a range of policies will be applicable depending on individual / household circumstances.
Race (Including: colour, nationality, citizenship ethnic or national origins)	**P**	The Gypsy and Traveller policy is being reviewed to ensure that their needs can be met over the plan period and this is informed by a new Gypsy and Traveller Accommodation Assessment. However, more work could be done to understand other impacts on race and how policies could address these if there are particular issues arising as the result of further evidence.
Religion and belief	**ID**	People of different religions and faiths may face barriers to accessing suitable places of worship, which may have particular requirements in terms of location, space and built form/function. The review of the Local Plan can influence the protection and location of community facilities and services and can therefore influence opportunities for religious groups to practice their religion and

		worship. No direct impact although a range of policies will be applicable depending on individual / household circumstances
Sex	**ID**	The pattern and location of development may have some impacts with regard to gender. The lives of older women are often different to those of older men. On average, women live longer and are more likely to be working later in life and have lower incomes. These factors will also impact on how the review of the Local Plan can have regard to other protected characteristics (including Age and Disability). Traditionally, working-age women have been more likely to have varied working patterns compared to men, with one or more part-time jobs, and may leave the labour market earlier, perhaps to care for children. Therefore, the need for access to public transport, proximity to workplaces and the avoidance of isolated locations are all considerations in planning to meet the needs of women.
Sexual orientation	**ID**	No direct impact although a range of policies will be applicable depending on individual / household circumstances

HEALTH INEQUALITIES

2.3	Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health. Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities **Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.** **If you need assistance in completing this section please contact: Alicia Philips or Lisa Young**

	in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx

Question	Issues to consider
2.3a What HIs exist in relation to your work / plan / strategy	• Explore existing data sources on the distribution of health across different population groups *(examples of where to find data to be included in support materials)* • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	Response: The local Plan evidence base calls upon a range of sources of information and a topic paper on health has been produced in conjunction with officers from the public health team to ensure that health issues are considered in the development of the Local Plan review. The Local Plan Regulation 18 document has also been subject to independent Sustainability Appraisal which also includes consideration of health in that context.
2.3b How might your work affect HI (positively or negatively). How might your work address the needs of different groups that share protected characteristics	**Consider and answer below:** • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income • Consider what the unintended consequences of your work might be
	Response: a. Potential outcomes including impact based on socio-economic status or geographical deprivation As set out in the EIA above, the evidence and proposed policy changes take into account a range of needs to ensure that Coventry delivers the right types of development for a range of needs. Health is not just determined by individual and lifestyle factors but also the environment and communities in which we live, work and play. In the context of regeneration, the development of local areas can impact on their affordability for some groups. As a lower socioeconomic gradient is associated with poorer health

outcomes, this can lead to a worsening of health inequalities. The Local Plan review should not inadvertently widen health inequalities, but rather should seek to reduce them. This may require monitoring, particularly of impacts to deprived sectors of the population.

Employment: has a multitude of physical and mental health benefits such as increased self-rated physical health and mental health. The Local Plan review sets about many ways in which employment could be increased as a result of development, particularly in the building sector. The increase in office workspace in the city can have a positive impact, although is recommended to be considered alongside the rise in demand for home working due to the COVID-19 pandemic.

Sustainable Transport: is a key part of The Local Plan review linked directly to tackling the challenges associated with climatic changes. Increased use of public transport can result in improved air quality which has a multitude of health benefits. Poor air quality is associated with exacerbation of asthma, cardiovascular disease and other respiratory conditions. In Coventry, 93% of residents live within 600m of a bus stop and most bus routes head towards the city centre. With the Local Plan review making various references to improved bus infrastructure, there is huge potential for increased useability, resulting in improved accessibility and social connectedness for Coventry people. However, it is recognised that increases in the cost of public transport could have a detrimental impact to affordability of sustainable transport, with knock on impacts on mental health and wellbeing, and therefore should be avoided where possible.

Obesity: has been causally linked with several chronic diseases including diabetes, hypertension, stroke and certain forms of cancer. There is also increased risk of mortality with disproportionate impacts on those in a lower socio-economic position, those with disabilities and people with mental health problems. The 'obesogenic environment' refers to the role environmental factors play in determining nutritional and physical activity behaviours; and the obesogenicity of an environment is defined has the sum of influences that the surroundings, opportunities, or conditions of life have on promoting obesity in individuals or populations. Obesogenic environments are implicit our everyday lives. Modern advances in technology and design have resulted in increased sedentary behaviour and less movement, for example through desk-based jobs, escalator use over stair use, and home deliveries over in person shopping. The Local Plan review includes policies to increase active travel modes of walking and cycling thereby supporting mode shift through reference to traffic dominance and policies to shift design and management of streets to incorporate cycle lanes and safer walkways. However, infrastructure needs to be complemented by continual work to encourage, enable and facilitate walking and cycling within communities partially through behaviour

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change initiatives. Benefits of such initiatives include improved mental health and social connectivity, cleaner air, safer streets enabling children to play and less sedentary lifestyles. The COVID-19 pandemic may have resulted in people having increased unstructured time confined to their homes, and higher levels of stress and anxiety which are associated with overeating. Availability, access and promotion of certain foods, particularly those high in fat, sugar and salt (HFSS) facilitate increased consumption of unhealthy food, which further contributes to obesity. More needs to be done to limit access to these foods, or increase availability, access and affordability of healthy foods especially in at-risk populations. It is with these considerations that it is recommended that spaces are designed with evidence of limiting further creation of obesogenic environments.

Housing: the negative health impacts on housing include physical effects from mould, cold homes, internal air quality, overcrowding and mental health effects such as depression and anxiety. Poor housing can limit an individual's ability to reach their potential and living in areas with high crime, low green space and litter can have adverse impacts on ability to exercise outdoors and people's sense of belonging. Adequate energy efficiency and insulation of homes is essential for reducing heating costs and limiting negative environmental impact. The Local Plan review will have bespoke targets to make new homes as accessible as possible, this will be positive for the high proportion of people with disabilities in Coventry.

Communities: a sense of belonging with one's neighbourhood has positive impacts for wellbeing. This forms part of the Index of Multiple Deprivation (IMD). An increased sense of belonging can improve deprivation and therefore health and wellbeing. This is a theme that comes through strongly in the Local Plan review with policies seeking to uplift areas by facilitating community cohesion and civic engagement. Design principles to create good quality, sustainable, inclusive and accessible places to live, work and play are referenced throughout the Local Plan review. Creating public spaces that encourage social interaction can have positive impacts on mental and physical health. It is recognised that continual assessment of need through community participation is crucial, particularly considering inward migration into the city and changing population dynamics. Equally, adherence to design principals is key, with due consideration for different population groups including for example, people with limited mobility or people living with dementia, to support them in leading more fulfilling lives. While there are negative impacts of building on green space, Local Plan review policies indicate mitigations for this in line with NPPF guidance to make as much use as possible of previously developed land or brownfield land and to include green space in new developments. Equally, the commitment to working with communities and community groups through means such as neighbourhood plans shows willingness for citizen-led participation.

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Affordability: the Marmot Review highlighted that financial deprivation can be a barrier to living healthier lives. The current cost of living crisis therefore will inevitably impact many people across Coventry, particularly those who are already facing financial challenge. While costs fall outside the parameters of a Local Plan review, the reduction in disposable income, and its impact on paying for homes and heating, food and travel, and other necessities, and its inevitable impact on health and wellbeing, cannot be ignored. The Local Plan review seeks to mitigate these issues where possible through for example, creating a proportion of affordable homes and supporting infrastructure for active travel. It is recommended that these aspects, particularly the need for affordable housing and use of viability loophole, is continually monitored to prevent people living in overcrowded and unsafe conditions as much as possible.
b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community. This HIA has assessed the Local Plan review impacts on lifestyles, social and community influences, living and environment conditions, access and quality of services and macro-economic environment and sustainability factors. The Local Plan review isuues and options (Reg 18) version is being written at a time where the country is recovering from the COVID-19 pandemic, with opportunities to implement learnings to 'build back fairer'. Throughout 2023 comes with fears of increasing interest rates; a rise in the energy cap; higher house prices; increased taxation and inflation without concurrent pay rises. It is in the midst of this, the Local Plan review is able to facilitate improvement in the health of the population of Coventry by using its influence to mitigate risks and create an environment in which all citizens can flourish. While the Local Plan review policies guide the design and infrastructure of future developments, it is recognised that complementing this work with behaviour change initiatives, engaging with communities and coproducing with communities will enable consideration of health impacts on all of Coventry's people to remain a priority.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

The Health policy of the Local Plan, which requires major planning applications over a certain threshold to undertake Health Impact assessment is proposed to be strengthened and this will impact on proposals for housing development in the future to ensure that health matters are taken into account. As the policies of the plan are developed in more detail (after consultation feedback), this will include an updated Health Impact Assessment to update the assessment undertaken for the original Local Plan

review and ensure that the policies take health matters into account before their proposed wording is finalised. Throughout the Regulation 18 Draft Local Plan review, there are multiple references to creating good quality, long lasting, and accessible homes and developments. Alongside this, the minimisation of climate impacts is commendable as is the celebration of our city's unique heritage, and this is linked to a stronger and more connected community identity which is conducive to good mental health and wellbeing. Retaining places of worship and cultural spaces will also further reinforce identity and connectedness in the city. The reference to both physical and mental health within the Plan is noted and considered important to contribute to the parity of esteem. Furthermore, due consideration of mitigation of unavoidable negative health impacts are also apparent throughout the given policies. Given the above, the recommendations for Planning colleagues generally refer to making more explicit reference to both positive and negative health impacts and given mitigations. This seeks to support colleague's efforts in showing due consideration to health in the Local Plan. Other recommendations seek to account for or emphasise health issues brought to the forefront through the covid-19 pandemic and minimise risk of inadvertently widening the inequality gap.

DIGITAL INCLUSION

2.5	The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English (NHS Digital.) Some of the barriers to digital inclusion can include lack of: • **Access** to a device and/or data • **Digital skills** • **Motivation** to get online • **Trust** of online safety Digital exclusion is not a fixed entity and may look different to different people at different times. Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.

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	Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to. Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it. It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work. **Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.** **If you need assistance in completing this section please contact: Laura Waller (*Digital Services & Inclusion Lead, CCC*). More details and worked examples can be found at** https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx

Question	Issues to consider
2.5 What digital inequalities exist in relation to your work / plan / strategy?	• Does your work assume service users have digital access and skills? • Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? • Consider what the unintended consequences of your work might be.
	Response: Planning departments have to produce (by law) a Statement of Community involvement (SCI) which sets out how we will engage with local communities in a range of ways including non-digital methods. This can be viewed on our website which details the standards associated with digital inclusion: https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/8
2.5b How will you mitigate against digital inequalities?	• If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.
	Response: we use a variety of methods to publicise consultations, produce documents on accessible formats, provide hard copies and run in-person events as detailed in the adopted SCI, 2021:

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

2.6 How will you monitor and evaluate the effect of this work?

We are required to monitor Local Plan policy in line with government requirements, and we will review our monitoring targets as we progress the plan review to ensure they are fit for purpose and are delivering as intended. The existing Local Plan already includes monitoring indicators and these will be reviewed and updated as necessary to ensure continuity. However, there is scope to improve the monitoring process and we will be looking at this in more detail as the review is progressed through the regulatory process.

2.7 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Religion:

Any other	
Buddhist	
Christian	
Hindu	

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White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups ☐

Positive impact has been identified for one or more protected groups ☒

Negative impact has been identified for one or more protected groups ☐

Both positive and negative impact has been identified for one or more protected groups ☐

4.0 Approval

Signed: Head of Service: **Chris Styles**	**Date: 09/06/2023**
Name of Director: **Andrew Walster**	**Date sent to Director: 09/06/2023**
Name of Lead Elected Member: **Cllr D Welsh**	**Date sent to Councillor:** **Appendix to Local Plan Reg 18 Cabinet report 11 July 2023**

Coventry City Council

Email completed EIA to equality@coventry.gov.uk

Coventry City Council

Public report
Cabinet

Cabinet	11th July 2023
Council	18th July 2023
Audit and Procurement Committee	24th July 2023

Name of Cabinet Member:
Cabinet Member for Strategic Finance and Resources - Councillor R Brown

Director Approving Submission of the report:
Chief Operating Officer (Section 151 Officer)

Ward(s) affected: All

Title:
Revenue and Capital Outturn 2022/23

Is this a key decision?
Yes - The report deals with financial matters in excess of £1.0m including specific new recommendations to allocate resources within the outturn position

Executive Summary:

This report outlines the final revenue and capital outturn position for 2022/23 and reviews treasury management activity and 2022/23 Prudential Indicators reported under the Prudential Code for Capital Finance.

The overall financial position includes the following headline items:

- An overspend of **£6.7m**, balanced by a contribution from legacy COVID reserves.
- Capital Programme expenditure of **£146.9m**
- A reduction in the level of available Council revenue reserves from £140m to **£123m**

Further detail includes:

- An overspend of £9.4m within Streetscene and Regulatory Services includes the combined impact of the refuse drivers' strike, strike mitigation costs and the loss of commercial refuse service income as a result of the strike.
- An overspend of £4.1m within Childrens' Services reflecting high placement costs and social worker recruitment and retention pressures.
- An overspend of £2.7m in Adults' Social Care reflecting an increased number of high-cost complex cases.
- An overspend of £2.7m on Business & Investment Culture which represents significant energy inflationary pressure, as well as running costs and business rates for the Collection Centre in advance of construction start dates.

- A net underspend of £13.5m within central budgets including lower superannuation costs, interest income from loans and higher than budgeted investment income, and a surplus from the Coventry and Warwickshire Business Rates Pool.

The underlying revenue position has improved by £1.8m since Quarter 3 when an overspend of £8.5m was forecast. In particular the improved position relates to improvements within Contingency and Central budgets which are set out in the report.

The prudent management of the Councils financial position throughout the Covid crisis enabled the Council to retain some resources to manage any legacy issues. £6.7m of this has been used to balance the position at the end of 2022/23. Although the Covid crisis is no longer a significant threat to the Councils service delivery and financial position, the cost-of-living crisis and growing levels of inflation have had tangible impacts on demand for both Childrens and Adults services. The complexity of need, support required and sufficiency of the external market to provide for this has directly impacted the Councils financial outturn reported up to 31st March 2023 and will be an ongoing financial challenge in 2023/24.

Recommendations:

Cabinet is recommended to approve:

1) The final balanced revenue outturn position after a contribution of £6.7m from reserves.

2) The final capital expenditure and resourcing position (section 2.3 and Appendix 2 of the report), incorporating expenditure of £146.9m against a final budget of £160.9m; £14m expenditure rescheduled into 2023/24.

3) The outturn Prudential Indicators position in section 2.4.4 and Appendix 3 of the report.

Cabinet is requested to recommend that Council: -

4) Approves the reserve contribution of £6.7m for the purposes described in Section 5.1 of the report.

Council is recommended

1) Approve the reserve contribution of £6.7m for the purposes described in Section 5.1 of the report.

Audit and Procurement Committee is recommended to:

1) Consider the contents of the report and determine whether there are any issues which it wants to refer to the Cabinet Member for Strategic Finance and Resources.

List of Appendices included:

Appendix 1 - Detailed breakdown of Directorate Revenue Variations
Appendix 2 - Capital Programme Changes and Analysis of Rescheduling
Appendix 3 - Prudential Indicators

Other useful background papers:

None

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel, or other body?

Yes - Audit and Procurement Committee 24th July 2023

Will this report go to Council?

Yes – 18th July 2023

Report title: Revenue and Capital Outturn 2022/23

1. Context (or background)

1.1 This report sets out the Council's revenue and capital outturn position for 2022/23 and performance against its Prudential Indicators for the year. The City Council set a revenue budget for the year of £237.4m and has a revised Capital Programme of £160.9m.

1.2 The reported figures show the Council's financial position in relation to management accounts used to monitor performance through the year. The Audit and Procurement Committee will consider separately the Council's statutory Statement of Accounts.

2. Options considered and recommended proposal

2.1 Revenue Outturn

2.1.1 Table 1 below summarises the outturn position for each division and the required contribution from reserves to achieve a balanced position for the Council.

Table 1 Summary Outturn Position

Quarter 3 Forecast Variance		Revised Budget	Final Outturn	**Outturn Variance** **Overspend/ (underspend)**	Movement from Q3 worse/ (better)
£m		**£m**	**£m**	**£m**	**£m**
(0.7)	Adult Services & Housing	99.6	102.3	**2.7**	3.4
2.1	Business, Investment & Culture	5.7	8.3	**2.7**	0.6
4.0	Children & Young People's Services	84.9	89.0	**4.1**	0.1
(9.7)	Contingency & Central Budgets	(22.5)	(36.0)	**(13.5)**	(3.8)
0.0	Education & Skills	19.8	19.5	**(0.4)**	(0.4)
1.8	Finance & Corporate Services	6.9	7.6	**0.8**	(1.0)
(0.5)	Human Resources	1.9	0.9	**(1.0)**	(0.5)
0.8	Legal & Governance Services	4.8	5.5	**0.7**	(0.1)
0.0	People Directorate Management	1.2	1.1	**0.0**	0.0
1.0	Project Management & Property Services	(7.1)	(6.0)	**1.1**	0.1
(0.5)	Public Health	2.2	0.7	**(1.6)**	(1.1)
8.5	Streetscene & Regulatory Services	31.6	41.0	**9.4**	0.9
1.6	Transport & Highways	8.3	10.0	**1.7**	0.1
8.5	**SUBTOTAL**	**237.3**	**243.9**	**6.7**	**(1.8)**
-	Contribution from reserves	-	-	**(6.7)**	(6.7)
8.5	**TOTAL**	**237.3**	**243.9**	**0.0**	**(8.5)**

The quarter 3 position reflected an overspend of £8.5m with the key variations between quarter 3 and Outturn occurring within Contingency and Central Budgets which improved by £3.8m and Adults Services worsening by £3.4m. The reasons for these variations are included in the explanations of overall budgetary variations below.

Explanation of Variations

Movement from Quarter 3

The most significant unfavourable movement since Quarter 3 has been within **Adult Services & Housing** which has worsened by £3.4m. This was driven by a larger than normal number of high complex social care cases being transferred retrospectively from Health to Adult Services which was further exacerbated by a revision to one element of the income forecast.

Other significant unfavourable movements have occurred in both **Streetscene** and **Business Investment & Culture,** primarily relating to less income from commercial waste customers than forecast as a legacy impact of the driver strike, together with a higher cost of maintaining interim arrangements for domestic waste collections, and less planning application income reflecting a worse trend in the development industry than had been expected.

A £3.8m favourable movement in **Corporate and Contingency** budgets incorporates an improved Asset Management Revenue Account position (£1.1m), a windfall distribution of Business Rates Levy Account Surplus by the Government (£0.7m), service commercial income in excess of budget (£0.5m), reserves not required for their original purpose contributed to the bottom line (£0.5m), increased Business Rates Pool income (£0.4m) and lower superannuation costs (£0.2m).

Most other remaining services have improved or maintained their quarter 3 position.

Final Outturn Position

Contingency and Central (£13.5m Underspend)

The overall Corporate and Contingency underspend of £13.5m incorporates favourable variances of £6.0m in the Asset Management Revenue Account (AMRA) and £7.5m across all other contingency budgets. The AMRA variation incorporates higher than budgeted interest income from loans provided by the Council, higher than budgeted investment income from a combination of larger short-term investment balances and higher interest rates, lower than assumed interest debt costs and higher dividends from Council owned companies. In addition to inflationary impacts reported within individual services, central budgets include the cost of the expected 2022/23 pay award which averages c6% for the Council and represents a cost c£6m above the original budget. This is offset by other contingency budgets and a £1m reserve contribution set aside to manage unbudgeted pay costs. Favourable variations include lower than budgeted superannuation costs (£4m), a Business Rates Pool surplus (£2m) and savings derived from new commercialisation activities (£0.5m).

Council Services (£20.2m Overspend)

Adult Social Care & Housing

The £2.7m overspend in Adult Social Care is multi-faceted. There has been an increasing number of high-cost complex cases although this has been partially mitigated by reductions in some lower complexity cases. However, a larger than normal number of cases has been transferred retrospectively from Health to Adult Social Care in the final quarter causing a worsened financial position.

Children and Young People

Children and Young People's Services continues to report a significant overspend linked to circumstances exacerbated by the pandemic. Of the overall £4.1m overspend, £1.9m is caused by the insufficiency of the children's external placement market to meet demand, which is impacting on the average unit cost of those placements. There are also still significant concerns regarding staffing, accounting for a further £2.2m overspend caused by issues surrounding recruitment and retention as well as a shortage of agency social workers to fill roles needed to meet the growing demand in casework.

Streetscene & Regulatory Services

Within Streetscene & Regulatory Services, the vast majority of the overspend relates to the combined impact on Domestic and Commercial Refuse collection services of the HGV driver strike and strike mitigation costs. During the period of industrial action, significant additional costs of providing both waste drop sites and latterly the collection of kerbside waste through a third-party provider (Tom White Waste) have been incurred. This together with lost contractual income within the commercial service and planning development income pressures have resulted in a net combined pressure of c£9.4m. The dispute has now been resolved such that strike mitigation pressures will not continue into 2023/24. However, the net contractual income lost within the commercial service will result in a more lasting financial impact as many clients have sought collection services from other providers.

Inflation and Other

Within Property, Transport and Highways, and Business Investment & Culture, significant inflation pressures have been reported for operational properties and street lighting energy totalling £2.4m, as costs have risen sharply from October 2022 reflecting national and global pressures. The energy market is currently very volatile and further increases may be seen which would also impact materially on 2023/24 and beyond.

In addition, the running costs of the Collection Centre building being kept operational during the City of Culture year and until construction starts are resulting in a pressure of £1.2m, the vast majority of which relates to business rates which will ultimately credit the fund.

2.2 Reserves

2.2.1 The Council's revenue reserve balance at the end of 2022/23 is £123m compared with £140m at the end of 2021/22. Resources set aside to support the Better Care Fund (delivered jointly with the health sector), Homes for Ukraine and to support capital projects have increased. These increases have been more than offset by use of resources to balance the year-end position (Covid funding) and the 2023/24 Budget (Business Rates reserve), and to deliver corporate projects such as the Very Light Rail scheme and City Readiness for the City of Culture and Commonwealth Games.

2.2.2 Balances generated from capital receipts and capital grants to fund future capital projects have increased from £37m to £40m and reserve balances belonging to or earmarked to support schools have increased from £31m to £33m. The total reserve movement in 2022/23 is summarised in the table below.

Table 3 Summary of Reserve Movements in 2022/23

	1st Apr 2022	(Increase)/ Decrease	31st Mar 2023
	£000	£000	£000

Council Revenue Reserves			
General Fund Balance	(10,277)	0	(10,277)
Adult Social Care	(28,287)	(2,961)	(31,248)
Private Finance Initiatives	(9,626)	1,518	(8,109)
Early Retirement and Voluntary Redundancy	(9,323)	2,082	(7,242)
Management of Capital	(3,410)	(2,913)	(6,324)
Innovation and Development Fund	(5,499)	431	(5,068)
Reset and Recovery	(5,467)	0	(5,467)
Covid 19 Funding	(10,981)	6,721	(4,260)
Air Quality Early Measures	(4,232)	312	(3,920)
Public Health	(2,469)	(1,280)	(3,749)
Potential Loss of Business Rates Income	(7,735)	4,302	(3,433)
Corporate Priorities (2020/21 Outturn Underspend)	(8,698)	5,705	(2,993)
Commercial Developments	(3,348)	666	(2,682)
Homes for Ukraine	0	(2,530)	(2,530)
Friargate Lifecycle	(1,594)	0	(1,594)
City of Culture & Commonwealth Games Legacy	(3,983)	2,582	(1,401)
Adult Education Income	(1,086)	(5)	(1,091)
Insurance Fund	(1,497)	433	(1,064)
Corporate Property Management	(1,369)	550	(819)
Children's Social Care Family Valued Programme	(1,229)	585	(644)
Other Directorate	(14,538)	(613)	(15,151)
Other Corporate	(5,843)	2,383	(3,460)
Total Council Revenue Reserves	**(140,493)**	**17,967**	**(122,527)**
Extra-Ordinary Item - Covid Business Rates Relief	**(18,635)**	**18,635**	**0**
Council Capital Reserves			
Useable Capital Receipts Reserve	(31,187)	(3,292)	(34,479)
Capital Grant Unapplied Account	(5,469)	(276)	(5,745)
Total Council Capital Reserves	**(36,656)**	**(3,567)**	**(40,224)**
School Reserves			
Schools (specific to individual schools)	(25,065)	2,108	(22,956)
Schools (related to expenditure retained centrally)	(5,927)	(4,310)	(10,237)
Total Schools Reserves	**(30,991)**	**(2,202)**	**(33,193)**
Total Reserves	**(226,776)**	**30,833**	**(195,943)**

2.2.3 It should be noted that the Council's reserve balances included an extra-ordinary balance of £19m at the end of 2021/22. Government Covid Business Rates reliefs announced previously had the effect of reducing the amount of Business Rates payable in 2021/22 causing a deficit within the Business Rates Collection Fund. Accounting rules meant that the corresponding grant (from Government) could not be applied to the Collection Fund until 2022/23. This grant has been fully used during 2022/23.

2.2.4 Adult Social Care resources represent the largest area of balances. These are overwhelmingly funded through ring-fenced grant and health sector resources for the delivery of jointly managed pooled budget arrangements with Health. In addition to these, the revenue reserve balances include £13m set aside as Funding for the Future approved previously, £8m set aside as part of the Council's three long-term Private Finance Initiative models and £7m set aside to fund costs arising from early retirement and redundancy decisions.

2.2.5 In line with recent practice, analysis of these balances will be undertaken as part of a wider exercise examining the Council's financial position in 2023/24 and going forward.

2.3 Capital Outturn

2.3.1 The capital outturn position for 2022/23 is shown in summary below and in greater detail in Appendix 2:

Table 4: Capital Outturn Summary

Final Budget £m	Final Spend £m	Net Rescheduling Now Reported £m	Under-spends £m	Total Variance £m
160.9	146.9	(14.0)	(0.0)	(14.0)

The quarter 3 monitoring report to Cabinet on 14th February 2023 approved a revised capital budget of £159.5m for 2022/23. Since then, there has been a net programme increase of c£1.4m giving a final budget for the year of £160.9m. Since February, a total of £14m net rescheduled spending has arisen within the capital programme. A scheme by scheme analysis is included in Appendix 2, a summary of key schemes is in the table below.

Table 5: Summary of Rescheduling

Project	**(Rescheduling) /Accelerated Spend £m**	**Explanations**
City Centre South	(2.8)	The timescales to acquire the Albert Buildings site (Iceland) and one of the external stalls in Coventry Market were different to those originally estimated. Furthermore, the CPO Inquiry for the scheme took place later than originally anticipated (January 2023) due to the commercial negotiations with the developer and CCC funding decisions (Cabinet Report Nov 2022) and this has resulted in changes to planned CPO related expenditure
Friargate (Building 2 and Hotel)	(5.3)	£3.3m of the slippage is related to construction which has slipped from April to July 23, the remainder relates to the public realm works being paid in instalments and the Hotel Loan being deferred to 2023/24

Transportation S106 Programme	(1.2)	There have been a number of S106 funded schemes that have been forward funded or developed pending the S106 funding being legally signed, and income received, for example, Keresley Link Road, Shultern Lane/Lynchgate Cycle Scheme, Coundon Park and Coundon Wedge Drive schemes. This has resulted in designs/programmed works slipping into 2023/24
Binley Road Cycleway	(2.2)	Work has been progressing well on the construction of the Binley Cycle Route, but there has been a need to review the design of one section of the route, on Clifford Bridge Road, to take account of consultation feedback. This has delayed the construction of that section of the route.
Palmer Lane Deculverting	(1.0)	Palmer Lane works have been delayed by legal processes taking longer than anticipated. Works will start summer 2023.
Schools Basic Need Programme	3.0	Spend against forecasts works have progressed quicker than expected on secondary expansion. Some additional works have been required to accommodate SEND pupils which were not factored into forecasts
Uk City of Culture / St Marys / Albany Theatre / Cultural Gateway	(1.9)	The Albany Theatre Project is progressing well but has been subject to c£1.3m of slippage due to unforeseen ground obstructions that had been discovered on site. The scheme is due to complete in November 2023. There is Cultural Gateway slippage of £0.3m caused by a slight delay in the commencement of the stage 4 design works.
Other	(2.6)	Smaller schemes
TOTAL	**(14.0)**	

2.3.2 The 2022/23 programme continued to maintain a significant investment in the city's transport and public infrastructure, including schemes demonstrating an increasing engagement with environmental initiatives and a range of other projects showing the Council's desire to make Coventry an attractive place to live, work and do business:

- £35.4m has been spent on transport and highways infrastructure across a range of both major and minor schemes. These included works to deliver the A46 Stoneleigh Junction due for completion in Summer 2023, further research and development investment in Very Light Rail, the overbridge installation on the A45 Eastern Green to unlock development land and schemes to improve and maintain the city's highways via the City Region Sustainable Transport Settlement (CRSTS) for Highways Maintenance and our Local Network Improvement Plan.

- A further £5.0m has been spent on City Centre South, this has predominantly been on the acquisition of land and promoting the CPO Process.

- Further programme spend of £27.2m has been made in 2022/23 on the completion of Friargate Building 2 and commencement of the hotel within Friargate Business District. The new hotel facilities are due to complete in October.

- Air quality and Binley Cycleway works amounting to c£15.3m have continued with the majority of the works completed by summer 2023.

- There have been works totalling £21.3m across the school's property estate as part of the One Coventry Strategic Plan. There is an increasing focus now on providing additional capacity in secondary schools across the city to meet the growing numbers amongst the secondary intake.

- City of Culture capital programme spend of £3.7m has continued this year on a range of Coventry's cultural capital assets, building a legacy for the city following the City of Culture year.

- External grants have been used to allow c£1.7m across a range of greener travel options including the cycle schemes, clean bus and electric vehicle technology and charging points.

- £5m of grant funding for the investment in Climate Change related project has been invested in 22/23 covering activities around solar, green home grant and decarbonisation project, the investment continues into 2023/24.

- Material Recycling Facility investment this year of £6m, the majority of which is a loan facility to Sherbourne Recycling Limited towards the Council's contribution to the creation of the facility.

- A range of smaller scale but not insignificant schemes have advanced including the purchase of more homes to provide homelessness provision, improved facilities at Lenton's Lane Cemetery and continued investment in Disabled Facilities Grants.

2.3.3 The funding in respect of this capital expenditure of £146.9m is summarised in Table 7 below Approximately 77% of the programme has been resourced from capital grants.

Table 7: Capital Funding

	Funding the Programme £m	Available Resources £m	Resources Carried Forward £m
Prudential Borrowing	18.9	18.9	0
Grants and Other Contributions	112.9	133.1	(20.2)
Revenue Contributions	4.6	4.6	0
Capital Receipts	9.7	44.2	(34.5)
Management of Capital Reserve	0.6	6.9	(6.3)
Private Finance Initiative (PFI)	0.2	0.2	0
Total Resourcing	**146.9**	**207.9**	**(61.0)**

2.4 Treasury Management Activity

2.4.1 The key policy to combat inflation still seems to be to raise interest rates. At the beginning of the year the Bank of England interest rate was 0.75% and by the end of the year it was 4.25%. The current market forecasts predict the base rate will continue to rise to 5% if not higher. The UK is not alone in this situation as inflation and rising interest rates is at the forefront of most of the world's economies.

Long Term (Capital) Borrowing

The Public Works Loan Board (PWLB) is the main source of loan finance for funding local authority capital investment. In August 2021 HM Treasury significantly revised guidance for the PWLB lending facility with more details and twelve examples of permitted and prohibited use of PWLB loans. Authorities that are purchasing or intending to purchase investment assets primarily for yield will not be able to access the PWLB except to refinance existing loans or externalise internal borrowing. Under the Treasury Management Strategy 2021/22 approved by Cabinet on 23 February 2021 it was agreed the Council will not buy investment assets primarily for yield.

Interest rates for local authority borrowing from the Public Works Loan Board (PWLB) for 2022/23 have varied within the following ranges:

Table 8: PWLB Interest Rates

PWLB Loan Duration (standard rates)	Minimum in 2022/23	Maximum in 2022/2023	Average in 2022/23
5-year	2.41	5.63	3.82
20-year	2.75	6.08	4.29
50-year	2.44	5.70	3.98

It has been more cost effective in the short-term to either use internal resources (cash balances) or to use short-term borrowing. By doing so, the Council has reduced net borrowing costs (despite foregone investment income) and reduced overall treasury risk.

2.4.2 At outturn, the Capital Financing Requirement (CFR), which indicates the Council's underlying need to borrow for capital purposes, has reduced by £0.3m: -

Table 9: 2022/23 Capital Financing Requirement (CFR)

	£m
Capital Financing Requirement at 1st April 2022	513.3
Borrowing required to finance 2022/23 Capital Programme	18.9
PFI & Finance Leases liabilities	(3.0)
Provision to Repay Debt (Minimum Revenue Provision)	(14.4)
Provision to Repay Debt (Capital Receipts Set Aside)	0.0
Repayment of Transferred Debt	(1.8)
Reduction of Provision and other restatements	0.0
Capital Financing Requirement at 1st April 2023	**513.0**

Within 2022/23, the movements in long-term borrowing and other liabilities were (stated at nominal value, excluding soft loan adjustments): -

Table 10: Long Term Liabilities (debt outstanding)

Source of Borrowing	Balance at 31st March 2022 £m	Repaid in Year £m	Raised in Year £m	Balance at 31st March 2023 £m
PWLB	190.4	(5.4)	0	185.0
LOBO's	38.0	0	0	38.0
Stock Issue	12.0	0	0	12.0
West Midlands Combined Authority	18.0	0	0	18.0
Other	0.4	0	0	0.4
subtotal ~ long term borrowing	**258.8**	**(5.4)**	**0**	**253.4**
Other Local Authority Debt	8.4	(1.8)	0	6.6
PFI & Finance Leasing Liabilities	59.9	(3.0)	0	56.9
Total	**327.1**	**(10.2)**	**0.0**	**316.9**

This long-term borrowing is repayable over the following periods: -

Table 11: Long Term Borrowing Maturity Profile (excluding PFI & transferred debt)

Period	Long Term Borrowing £m
Under 12 Months	17.2
1 – 2 years	31.0
2 – 5 years	16.5
5 – 10 years	64.9
Over 10 years	123.7
Total	**253.4**

In line with CIPFA Treasury Management Code requirements, Lenders Option, Borrowers Option Loans (LOBOs) with banks are included in the maturity profile based on the earliest date on which the lender can require repayment. The Council has £38m of such loans, £10m of which the lender can effectively require to be paid at annual intervals, and £28m at 5 yearly intervals.

Short-Term Borrowing and Investments

2.4.3 The Treasury Management Team acts daily to manage the City Council's day-to-day cash-flow, by borrowing or investing for short periods. By holding short term investments, such as money in call accounts, authorities help ensure that they have an adequate source of liquid funds. During the year, the Council held short-term investments, as set out in Table 12. The average short-term investment rate in 2022/23 was 2.6%. There was £10m of short-term borrowing in February 2023 to cover a forecasted shortfall in cash at the year-end

Table 12: In House Investments at 31st March 2023

	At 30th June 2022 £m	At 30th Sept 2022 £m	At 31st Dec 2022 £m	At 31st Mar 2023 £m
Banks and Building Societies	0.0	0.0	0.0	0.0
Local Authorities	15.0	0.0	0.0	0.0
Money Market Funds	41.85	35.65	56.55	42.96
Corporate Bonds	0.0	0.0	0.0	0.0
HM Treasury	0.0	16.8	0.0	0.0
Total	**56.85**	**52.45**	**56.55**	**42.96**

Pooled Investments

In addition to the above in-house investments, a mix of Collective Investment Schemes or "pooled funds" are used, where investment is in the form of sterling fund units and not specific individual investments with financial institutions or organisations. These funds are highly liquid, as cash can be withdrawn within two to four days, and short average duration of the intrinsic investments. These investments include Certificates of Deposits, Commercial Paper, Corporate Bonds, Floating Rate Notes, Call Account Deposits, Property and Equities. However, they are designed to be held for longer durations allowing any short-term fluctuations in return due to volatility to be smoothed out.

In order to manage credit risk these investments are spread across a number of funds as highlighted in the table below:

Table 13: External, Pooled Investments as at 31st March 2023

	Date Invested	Cost £m	Value £m	Annualised Return from Investment %
CCLA LAMIT Property Fund	Nov 2013	12.0	11.82	3.62%
M&G Optimal Income Fund	Aug 2018	1.5	1.34	4.27%
M&G Strategic Corporate Bond Fund	Aug 2018	3.0	2.59	3.59%
M&G UK Income Distribution Fund	Aug 2018	3.0	2.69	4.78%
Ninety One (Investec) Diversified Income Fund	Aug 2018	4.5	3.99	4.01%
Schroder Income Maximiser	Aug 2018	4.5	3.59	6.96%
Threadneedle Strategic Bond Fund	Aug 2018	1.5	1.36	3.26%
Total		**30.0**	**27.38**	**4.20%**

Credit risk remains central to local authority investment management and the Council's risk is managed in line with the Treasury Management Strategy, approved by Cabinet as part of the budget setting report at the meeting of 21 February 2023. Central to this is the assessment of credit quality based on a number of factors including credit ratings, credit

default swaps (insurance cost) and sovereign support mechanisms. Limits are set to manage exposure to individual institutions or groups. Credit ratings are obtained and monitored by the Council's treasury advisors, Arlingclose.

Pooled funds provided an income return of £1.3m over the year although as at 31st March 2023 the accumulated deficit on their capital value was £2.62m (£0.92m surplus at the end of 2021/22). All seven funds show a deficit in capital value which is reflective of the current property and financial markets. There remains an expectation that the full value will be recovered over the medium term - the period over which this type of investment should always be managed. Current accounting rules allow any 'losses' to be held on the Council's balance sheet and not counted as a revenue loss. These investments will continue to be monitored closely.

Summary Prudential Indicators

2.4.4 The Local Government Act 2003 and associated CIPFA Prudential and Treasury Management Codes set the framework for the local government capital finance system. Authorities are able to borrow whatever sums they see fit to support their capital programmes, subject to them being able to afford the revenue costs. The framework requires that authorities set and monitor against a number of prudential and treasury indicators relating to capital, treasury management and revenue issues. These indicators are designed to ensure that borrowing entered into for capital purposes was affordable, sustainable, and prudent. The purpose of the indicators is to support decision making and financial management, rather than illustrate comparative performance.

The indicators, together with explanatory notes and the relevant figures are included in **Appendix 3.** This highlights that the Council's activities are within the amounts set as Performance Indicators for 2022/23. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 31st March 2023 the value is -£79.4m (minus) compared to +£94.9m within the Treasury Management Strategy, reflecting the fact that the Council has more significantly variable rate investments than variable rate borrowings at the current time.

- The Upper Limit on Fixed Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at fixed interest rates. At 31st March 2023 the value is £328.0m compared to £474.4m within the Treasury Management Strategy, reflecting that a significant proportion of the Council's investment balance is at a fixed interest rate.

Commercial Investment Strategy

2.4.5 The Council's Commercial Investment strategy is designed to ensure there are strong risk management arrangements and that the level of commercial investments held in the form of shares, commercial property, and loans to external organisations, is proportionate to the size of the Council. In doing this the strategy includes specific limits for the total cumulative investment through loans and shares.

In order to manage risk, the Council has limits for investing in shares and service loans, with total limit of £146m in 2022/23.

As at the end of 2022/23, the council had cumulatively invested £106.3m in shares and service loans with this rising to £134.6m when commitments to make potential payments of £28.3m are taken into account.

	As at 31st March 2023				
	Limit	Actual	Committed	Total	Variation
	£m	£m	£m	£m	£m
Shares	55.0	52.1	0.0	52.1	(2.9)
Loans	91.0	54.2	28.3	82.5	(8.5)
	146.0	**106.3**	**28.3**	**134.6**	**(11.4)**

The total of £134.6m is within the limit of £146m set for the 2022/23.

The Council's investment in commercial assets is proportionate:

- with commercial income totalling approximately £22.8m in 2022/23 (£23.4m in 2021/22) equivalent to c3.6% of the Council's budgeted net service expenditure of £640.1m in 2022/23.
- With commercial assets valued at £452m (25% of the Councils total asset base of c£1,779m). This is not the amount invested by the Council, for example through past capital programmes, as it includes revaluations over time. In addition, many assets classified by the Council as commercial have significant service dimensions, including economic development aspects, thereby contributing more broadly to the provision of services.
- with a Capital Financing Requirement of £513m representing the Council's underlying need to borrow, at 29% of the Council's total asset base.

3. Results of consultation undertaken

None.

4. Timetable for implementing this decision

There is no implementation timetable as this is a financial monitoring report.

5. Comments from the Chief Operating Officer (Section 151 Officer) and the Chief Legal Officer

5.1 Financial implications

The final revenue outturn picture for 2022/23 is balanced only after a year-end contribution of £6.7m from legacy COVID reserve balances. The need to draw down from reserves to balance the budget in-year reflects a serious position for the Council although this has improved from the £8.5m revenue overspend forecast at Quarter 3.

External factors, in particular inflationary pressures, contribute largely to the position presented and will have an impact on the Council beyond 2022/23. There are other intractable on-going issues including those relating to children's social care which are common to many councils across the country whilst the Council also managed local time-limited pressures in the year.

The timing of the surge in inflation meant that it was not anticipated in the Council's 2022/23 Budget process. Although the Council budgets prudently for inflationary costs, the acceleration in rising prices and pay award assumptions which together represented a cost of c£16m, exceeded the budgetary provision available by c£8m. The pay costs reflected the agreed local government pay award. The rise in energy prices can be observed in terms of the cost to the Council's property estate and costs within the city's street lighting energy bills. The Council's 2023/24 Budget anticipates further high levels of inflation although early signs are that a continuing high inflation environment will continue to put renewed pressure on the 2023/24 budgetary position.

Despite further increases to Children's Services' budgets for 2022/23, the demand and overall cases in Childrens Services continued to rise in the city leading to high agency social worker levels as well as the sufficiency issues in the external placement market driving costs up disproportionately against already high inflation. The refuse drivers' dispute led to costs being incurred well into the second quarter of the year. A wide range of other challenges are reported in Appendix 1 which, together with the issues reported above, reflect the difficult financial picture despite the flexibility identified with corporate and central budgets.

The position reported does not highlight specific costs or income loss attributable to Covid. Any such residual impacts such as growing demand on statutory intervention from Children's Services, subdued car park income and lower dividend levels, are now being treated as reflecting a new normal rather than extra-ordinary Covid impacts.

Although the Council has faced its most challenging in-year budgetary position for some years, the overall level of overspend has reduced somewhat towards the year end. The Council has taken steps previously to maintain a strong balance sheet position, including robust reserve balances, which have enabled it to manage the adverse budget variations encountered. It will be vital for the Council to continue to ensure that it maintains a prudent approach going forward.

The underlying position for future years continues to be very challenging and the Council needs to identify how it will be able to manage its medium-term financial position which is likely to come under severe pressure without further support from Government. The Council's strong financial planning approach has taken account of the risk of volatility across a range of budgets such as those in Children's Services, Adult Services, and inflationary pressures. In 2022/23, the level of demand and the increase in costs for this area have continued to exceed the Council's budgetary provision. Further funding has been provided by the Council as part of its 2023/24 budget although it remains to be seen whether this will be sufficient, especially given the economic and social realties currently being experienced across the country.

Several areas within corporate budgets including dividends, investment interest, superannuation and the Coventry and Warwickshire Business Rates Pool yield can be subject to volatility and were budgeted for on a prudent basis in 2022/23. The outturn position on these items was favourable against the range of reasonable expected outcomes and this has enabled the Council to partly absorb overspent budgets elsewhere within the bottom line and minimise the overall overspend. Several of these favourable financial outturns have occurred in areas that have been subject to affirmative Council decisions in recent years such as dividends and investment income.

The local government sector has witnessed risks materialise in the form of some high-profile financial failures often linked to ambitious local plans with scope to deliver financial returns. The Council is itself involved in a range of commercial ventures, company structures and

external loan financing arrangements and is committed to ensuring that it maintains a high degree of self-awareness of its position. High standards of due diligence, good governance and monitoring arrangements and the maintenance of a broad mix of activities to guard against a concentration of risk are all vital factors to protect the Council's financial position. The Council continues to be bold with its aspirations for the city and maintains a measured appetite for risk to achieve this. It is important for the Council to maintain contingency balances to protect against the risk of financial failure in one or more key areas.

With the exception of the Council's General Fund balance all reserves have been set aside to deliver specific projects or risks. Given the size of the Council's ambitions defined by its Capital Programme, its transformation programme and its financial involvements that extend beyond traditional local authority service provision it is entirely appropriate for the Council to support this in the form of balances to pump prime such areas and provide some financial risk mitigation. Nevertheless, the Council remains firmly within a 'mid-table' position with the most recent CIPFA Resilience Index in relation to the level of its reserve balances. This has enabled the Council to place itself in a strong financial position as well as providing the best basis for the Council to improve services for residents and invest in the city and its communities.

The level of expenditure across a broad number and type of capital schemes has once again demonstrated the Council's appetite to embark on ambitious and innovative projects and its success in attracting grant funding to do this. Although the Programme has, not surprisingly, dipped below the very high levels experienced previously it is nevertheless still high in a historical context and has been 77% funded from external grant. The programme's coverage of projects affecting the city centre skyline, enhancing transport infrastructure, improving the profile of the city, and providing support to local economic development, a range of projects dealing with the issues of Air Quality and helping to deliver the Council's climate change agenda.

Although the Council has undertaken some borrowing in-year this has been undertaken on a short-term basis at this stage, taking advantage of relatively low interest rates available from other local authorities. In other areas the Council continues to undertake prudent treasury activity and pursue commercial activity that is ambitious but proportionate to the size of its asset base and overall budget.

A report to the Council's Finance and Corporate Services Scrutiny Board 1 (29th March 2023) provided a detailed update on the background to the Council's decision to make a £1m loan to the Coventry City of Culture Trust during 2022/23. The Trust entered into administration during the year leaving the loan unpaid and also owing the Council c£0.6m for other services provided during the City of Culture programme. The Council has made it clear that it does not expect the large majority of this overall debt to be settled and a decision has been taken to write the whole sum off within the Council's accounts. This does not preclude the Council from seeking repayment from any resources available within the administration process although this is not considered a likely prospect. The debt write-off has been funded from c£1m set aside previously to fund legacy City of Culture activity and c£0.6m of City Readiness money approved previously to support initiatives and preparations aligned to the city's hosting of the City of Culture year and legacy programmes. This has enabled the debt to be written off without creating further budgetary pressure within the Council's revenue position.

5.2 Legal implications

The Cabinet has a responsibility to keep under review the budget of the Council and any other matter having substantial implications for the financial resources of the Council.

The Council must ensure sufficient flexibility to avoid going into deficit at any point during the financial year. The Chief Financial Officer is required to report on the robustness of the proposed financial reserves, under Section 25 of the Local Government Act 2003.

6. Other implications

6.1 How will this contribute to achievement of the One Coventry Plan?

This report provides an account of the overall financial performance of the Council compared with its original Budget. The Council also monitors the quality and level of service provided to the citizens of Coventry and the key objectives of the One Coventry Plan.

6.2 How is risk being managed?

The need to deliver a stable and balanced financial position in the short and medium term is a key corporate risk for the local authority and is reflected in the corporate risk register. Budgetary control and monitoring processes are paramount to managing this risk and this report is a key part of the process.

6.3 What is the impact on the organisation?

The revenue and capital outturn position reported here demonstrates that the Council continues to undertake sound overall financial management. This will continue to be important in the light of the current inflationary risks and the continued uncertainty with regard to the level of funding available to local government.

6.4 Equalities / EIA

No specific impact.

6.5 Implications for (or impact on) Climate Change and the Environment

None.

6.6 Implications for partner organisations?

None.

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Appendix 1 Revenue Variations

Appendix 1 details directorate forecast variances.

Budget variations have been analysed between those that are subject to a centralised forecast and those that are managed at service level (termed "Budget Holder Forecasts" for the purposes of this report). The centralised budget areas relate to salary costs – the Council applies strict control over recruitment such that managers are not able to recruit to vacant posts without first going through rigorous processes. In this sense managers must work within the existing establishment structure and salary budgets are controlled centrally rather than at this local level. The centralised forecast under-spend shown below is principally the effect of unfilled vacancies.

	Revised Budget	Actual Spend	Centralised Variance	Budget Holder Variance	Total Over/ (Under) Spend
	£m	£m	£m	£m	£m
Adult Social Care & Housing	99.6	102.3	(1.2)	4.0	**2.7**
Business Investment & Culture	5.7	8.3	0.5	2.1	**2.7**
Children & Young People's Services	84.9	89.0	(1.3)	5.4	**4.1**
Contingency & Central Budgets	(22.5)	(36.0)	0.0	(13.5)	**(13.5)**
Education and Skills	19.8	19.5	(0.9)	0.6	**(0.4)**
Finance & Corporate Services	6.9	7.6	(0.3)	1.1	**0.8**
Human Resources	1.9	0.9	0.0	(1.1)	**(1.0)**
Legal & Governance Services	4.8	5.5	(0.5)	1.2	**0.7**
People Directorate Management	1.2	1.1	(0.1)	0.1	**(0.0)**
Project Management & Property Services	(7.1)	(6.0)	0.2	0.9	**1.1**
Public Health	2.2	0.7	(0.0)	(1.5)	**(1.6)**
Streetscene & Regulatory Services	31.6	41.0	(0.6)	10.0	**9.4**
Transportation & Highways	8.3	10.0	(0.4)	2.1	**1.7**
Total	**237.4**	**244.1**	**(4.6)**	**11.3**	**6.7**

n.b. The figures in this table may be subject to small rounding differences to the main report and the rest of the appendix.

Centralised Variance Explanation	**£m**
These are underspends against a combination of salary budgets and turnover savings target. They result from vacancies across Council services. Turnover has remained consistent across the Council, however areas such as Adults & Childrens Services remain high, due to the national and regional Social Worker retention issues. Some of these vacancies will be covered by agency and overtime to ensure services can be maintained. These costs are included within the service positions described below.	(4.6)
Total Centralised Variance	**(4.6)**

Budget Holder Variance

Service Area	Reporting Area	Explanation	£M
Public Health	Public Health - Insight	The underspend is due to maximising the utilisation of COMF (Contain Outbreak Management Fund) grant funding	(0.4)
Public Health	Public Health – Inequalities	The underspend is due to maximising the utilisation of Domestic Abuse Safe Accommodation grant funding	(0.2)
Public Health	Public Health - Health Protection	The underspend is due to maximising the utilisation of COMF grant funding	(0.1)
Public Health	Public Health - Health Protection	This underspend relates to the holding of migration grant income centrally which is funding costs of other services across the Council.	(0.8)
Public Health			**(1.5)**
Education and Skills	Customer and Business Services	The Budget Holder underspend is mainly the result of short-term grant income from the Household Support Fund	(0.1)
Education and Skills	SEND & Specialist Services	The overall SEN Transport variance is predominately attributable to an increase in Out of City placements, coupled with higher value bid awards through the e-auction process and the requirement to expand Post 16 routes in response to a higher number of learners accessing Further Education (FE). Occasionally there has also been a need to commission additional taxis to compensate for unavoidable service disruption.	0.3
Education and Skills	Education Entitlement	A significant proportion of the underspend is as a result of reduced expenditure on school bus passes. The number of pupils eligible for bus passes is based on statutory criteria and policy. A new online system introduced by the bus companies at the end of last financial year means that where passes are not used charges are not incurred. New passes will be issued for the 2023/24 academic year and the position will continue to be monitored. There was also an underspend on the interpreter service as a result of cost review and increased efficiencies. Work is underway to ensure this is reflected in the charging model for the 2023/24 financial year.	(0.3)
Education and Skills	Employment & Adult Education	The yearend overall position for Employment is net nil with the majority of Budget Holder "overspend" is reserve contribution of £0.38m from underspend against centralised salaries due to high level of vacancies. Overspend in non-salary cost is £0.17m with £0.12m of that relates to delivery of extra programme funded by additional income, remaining of £0.05m non-pay overspend is made up of various minor operational spending.	0.4
Education and Skills	Other Variances Less that 100K		0.3
Education and Skills			**0.6**
Children and Young People's Services	Children's Services Management Team	Budgetary pressure in the Social Worker Academy was linked to staffing a second team to increase the amount of Newly Qualified Social Workers that could be recruited into the service. This cost was offset by an underspend on Financial Strategy.	(0.5)
Children and Young People's Services	Commissioning, QA and Performance	Safeguarding training income is £100k below the budgeted target and the Professional Support Service saving target of £53k has not been met. The remaining overspend is agency spend for Independent Reviewing Officers', Child Protection	0.3

		Chairs and Local Authority Designated Officers, due to pressures caused by vacancies and increasing caseloads	
Children and Young People's Services	Help & Protection	There is an overall budgetary pressure in Help and Protection, which includes the following: £1.6m pressure in the Area Teams linked to staff costs, with high levels of cases requiring additional workers and agency staff. £0.3m pressure in LAC legal costs linked to ongoing high levels of demand. Development work regarding pre proceedings work is envisaged to reduce this pressure once new procedures are implemented. £0.4m pressure in Section 17 spend linked to a high number of households being housed in temporary accommodation. There is an additional £0.1m pressure in NRPF (No recourse to public funds). This is unavoidable due to statutory responsibilities to financially support children and families who reside in Coventry without legal status to access benefits. There are short term savings which are currently offsetting the budget pressures from additional Grants and vacant posts across Early Help.	2.3
Children and Young People's Services	LAC & Care Leavers	There is a £1.9m overspend on looked after children's (LAC) placements. This is mainly linked to increasing unit costs for placements due to a lack of sufficiency in the market to meet the needs of young people in care. There is a further budget pressure of £500k due to staffing challenges within LAC permanency service and the need for agency staff to ensure that care proceedings continue to be progressed. This is an improving position as measures taken are now starting to have a positive impact. LAC transport has an overspend of £340k and this is as a result of placement arrangements where transport needs to be provided for children to continue in their current education provision. Work is on-going to improve sufficiency of local placements which will start to address this pressure. There is a overspend of £132k on Adoption Central England, this relates to an increase in Interagency fees and pay increases. Work is being undertaken to address this. There is a further budgetary pressure of £0.3m within the Children's disability service. This overspend relates to increased costs for short breaks & direct payments, DFG shortfalls and intensive support for some children to enable them to remain living at home, as an alternative to living in residential care. These overspends are offset by an increase in income from central government for unaccompanied asylum-seeking children.	3.3
Children and Young People's Services			**5.4**

Adult Social Care	Strategic Commissioning (Adults)	£0.6m underspend relates to New Homes for Old PFI due to additional client fee income. A further underspend relates to lower than anticipated transport costs to day opportunities.	(0.8)
Adult Social Care	Adult Social Care Director	The underspend represents an increase in the amount of iBCF and other resources that are drawn down to contribute to the overall budget position. This does mean there is less flexibility and therefore increased risk of overspends in subsequent years. This has been partly offset by increases in bad debt provision (£0.5m).	(1.8)
Adult Social Care	Internally Provided Services	Overspends relating to additional hours, agency and overtime costs have been offset by centralised underspends due to staff vacancies.	0.1
Adult Social Care	Partnerships and Social Care Operational	Overspends relating to additional agency costs which have partly been offset by centralised underspends due to staff vacancies.	0.2
Adult Social Care	Localities and Social Care Operational	Overspends relating to additional agency costs have been offset by centralised underspends due to staff vacancies.	0.3
Adult Social Care	Community Purchasing Mental Health	Demand for mental health services continues to increase, this impacts on provision of statutory services to meet essential need.	2.4
Adult Social Care	Community Purchasing Other	see above - Community purchasing spend is managed at an overall level and increased complexity of demand is being seen across all areas alongside increases to package costs driven by high levels of inflation. Activity throughout the year has also increased. In addition, costs relating to Hospital Discharge that were grant funded in the previous year were not funded for the first 6 months of the year. A hospital discharge grant was received covering the latter stage of the year.	3.9
Adult Social Care	Enablement & Therapy Services	Overspends on equipment purchases due to high inflation which have been offset by centralised underspends in salaries due to vacancies.	0.2
Adult Social Care	Housing and Homelessness	The number of households in temporary accommodation has continued to increase, particularly during Jan – April 2023 although the increase was not at the rate forecast. In addition, a further £0.2m homelessness prevention grant has been available by the DLUHC during 2022/23 offsetting the cost of temporary accommodation.	(0.7)
Adult Social Care	Mental Health Operational	There remains significant pressures in Deprivation of Liberty Assessment demand leading to additional assessment costs (£0.2m).	0.2
Adult Social Care			**4.0**
Business Investment & Culture	Sports, Culture, Destination & Bus Relationships	BH overspend of £2m mainly due to £1.22m Cultural services unfunded running costs in respect of the corporate Cultural Gateway project, the majority of which is business rates), £0.46m in respect of the Wave heatline (energy) costs and contribution to lifecycle costs, £0.33m deficit / income not achieved in the first year of the new St Mary's catering facility due to a delayed opening whilst capital works were completed, staff recruited etc.	2.3
Business Investment & Culture	Economic Development service (EDS)	Overspend of £0.15m mainly due to overspend Growth Hub unfunded £0.13m, various other net overspend £0.02m. e.g. MIPIM project deficit.	0.3

Business Investment & Culture			**2.6**
Human Resources	ICT & Digital	The Budget Holder variance comprises the some one-off underspends (reductions of £473K as a result of a negotiated one off reduction in first year cost of the contract; underspends on EA licence consumption charges, Network related hardware and Out of Hours allowances, plus identification of £288K income which has been subject to negotiation over the past few years but an agreement reached within the last quarter) partially offset by the on-going shortfall of schools income £189K.	(1.2)
Human Resources	Occupational Health, Safety and Wellbeing Services	Continued successful marketing and careful managing of staffing resources has resulted in higher income from external contracts. This continues to support the budget for the Council's core internal service. In 2023/24 most of this additional income will be required to fund continuation of temporary posts.	(0.1)
Human Resources	Other Variances Less that 100K		0.2
Human Resources			**(1.1)**
Finance & Corporate Services	Revenues and Benefits	There is a gross £0.5m pressure within the discretionary hardship payments (DHP) scheme due to a 30% reduction in government grant funding combined with an increase in demand for services. There is also a net Housing Benefit subsidy pressure of £0.3m caused by an increase in the volume and price of supported accommodation, for which the Council only receives partial subsidy payments if the provider is not a registered social landlord. In addition, there is a Housing Benefit subsidy pressure of £0.5m, relating to audit testing of the 2020-21 claim. These are offset by a contribution from reserves of £0.2m and by one-off new burdens grant funding for COVID business support and energy rebate administration.	0.8
Finance & Corporate Services	Financial Mgt	The pressure is a result of a significant increase in the number of individuals applying for welfare support from the Household Support Fund resulting in expenditure exceeding the grant allocation for the Oct-22 to Mar-23 period. This is offset by several small cost reductions across the service.	0.4
Finance & Corporate Services	Other Variances Less that 100K		(0.2)
Finance & Corporate Services			**1.0**
Legal & Governance Services	Legal Services	There is a significant pressure within legal services due to the cost of agency and external staff. The pressure relates to both recruitment and retention difficulties, and extra caseload primarily in children's social care as an ongoing impact of COVID-19.	1.1
Legal & Governance Services	Procurement	There was an improved income performance from the early payment scheme in 2022-23 (partially one-off).	(0.1)
Legal & Governance Services	Other Variances Less that 100K		0.1

Legal & Governance Services			**1.2**
Transportation & Highways	Traffic	The pressure relates primarily to an anticipated significant increase in street lighting energy costs from October 2022, resulting in unfunded contract costs of £0.8m. In addition, there is a pressure relating to the increased volume and cost of highway asset repairs of £0.2m, which is largely due to unrecoverable costs of traffic accidents	1.1
Transportation & Highways	Highways	An under recovery of income for highways (DLO) operational staff (£0.4m) due to sickness, vacancies, and strike action, together with the delayed achievement of some MTFS savings targets (£0.2m) and greater than anticipated reactive repairs costs (£0.1m).	0.7
Transportation & Highways	TH Management & Support	Variance is largely due to unachieved historic MTFS targets	0.1
Transportation & Highways	Transport Policy	This reflects the recruitment of additional Highways Development Management agency staff resources, brought in to support major planning applications and to provide cover for vacancies due to the inability to recruit.	0.2
Transportation & Highways			**2.1**
Streetscene & Regulatory Services	Planning Services	As a result of the downturn in the economy, income has been much lower than expected. This reflects a national trend.	0.8
Streetscene & Regulatory Services	Streetpride & Parks	Income targets are not being achieved (Funeral Services £160k, WMP Car Park £64k, Coombe Play £100k and Activities/Concessions across all parks £90k). Vacancies are being held across Streetpride pending the outcome of the review, so posts are being covered by agency/overtime c£100k. There are also Fleet pressures £200k and costs associated with Traveller Incursions of £193k	0.9
Streetscene & Regulatory Services	Waste & Fleet Services	Domestic Waste has overspent by c£7.1m which is predominantly due to mitigating action taken to maintain a waste collection service both during and after the HGV driver strike including the use of an alternative operator, temporary staff and vehicle hire. Additionally, Commercial Waste have overspent by £1.3m as a direct consequence of the dispute. These pressures are slightly offset by a reduction in Waste Disposal costs of (£650k) There were also pressures in Passenger Transport Service of £230k as a result of the higher than expected pay award (not passed on to internal customers) & additional staff required to cover high sickness levels.	8.0
Streetscene & Regulatory Services	Environmental Services	This variation is predominantly due to reduced income as a result of the number of vacancies across the area affecting the opportunity to generate new business, particularly Pest Control.	0.2
Streetscene & Regulatory Services	Other Variances Less that 100K		0.1
Streetscene & Regulatory Services			**10.0**
Project Management and Property Services	Commercial Property and Development	(0.1m) underspend in CPM is mainly due to: (£0.26m) landfill site provision released, which is offsetting Property Development overspend of £0.1m and Major City development £0.07m mainly on professional costs.	(0.1)

Project Management and Property Services	Facilities & Property Services	This pressure of £1.3m is primarily as a result of a £1.1m energy pressure for operational buildings caused by the rise in energy costs from October 2022. In addition, a £0.3m pressure for Fairfax Street unfunded holding costs, which has been partially offset by an expected trading surplus around (£0.17m) in the R&M function.	1.3
Project Management and Property Services	PMPS Management & Support	This reflects accelerated achievement of corporate MTFS savings for the strategic property review.	(0.3)
Project Management and Property Services			**(0.9)**
Contingency & Central Budgets	Corporate Finance	The overall Corporate and Contingency underspend of £13.5m incorporates favourable variances of £5.8m in the Asset Management Revenue Account (AMRA) and £7.2m across all other contingency budgets. The AMRA variation incorporates higher than budgeted interest income from loans provided by the Council, higher than budgeted investment income from a combination of larger short-term investment balances and higher interest rates, lower than assumed interest debt costs and higher dividends from Council owned companies. In addition to inflationary impacts reported within individual services, central budgets include the cost of the expected 2022/23 pay award which averages c6% for the Council and represents a cost c£6m above the original budget. This is offset by other inflation contingency budgets and a £1m reserve contribution set aside to manage unbudgeted pay costs. Favourable variations include lower than budgeted superannuation costs (£4m), a Business Rates Pool surplus (£2m) and savings derived from new commercialisation activities (£0.5m).	(13.5)
Total Budget Holder Forecast Variances -Contingency & Central Budgets			**11.5**

Appendix 2 Capital Programme Change and Analysis of Rescheduling

SCHEME	APPROVED CHANGES £m	(RESCHEDULING) / ACCELERATED SPEND £m	EXPLANATION
Coventry South and North Package - WMCA Investment Programme		(0.5)	Spend on the M6 J3 design has been deferred to 2023/24 following National Highways funding being secured in 2022/23 to undertake an initial Options Appraisal. A46 Link Road spend was re-profiled to align the next phase of Options Appraisal with the programme for the South Warwickshire Local Plan Review.
City Centre South		(2.8)	The timescales to acquire the Albert Buildings site (Iceland) and one of the external stalls in Coventry Market were different to those originally estimated. Furthermore, the CPO Inquiry for the scheme took place later than originally anticipated (January 2023) due to the commercial negotiations with the developer and CCC funding decisions (Cabinet Report Nov 2022) and this has resulted in changes to planned CPO related expenditure.
Friargate (Building 2 and Hotel)		(5.3)	It was anticipated that Two Friargate would complete at the end of April 2023, however, the anticipated completion date has moved to July 2023. This change is caused by delays to the provision of utilities (power) on site and resultant impacts on the final commissioning works for the building. As a result, a larger element of spend has slipped into 2023/24.
Transportation Key Route Network (KRN)		(0.4)	The remainder of this work is scheduled for Quarter 1 2023/24.
Transportation S106 Programme		(1.2)	There have been a number of S106 funded schemes that have been either forward funded or developed pending the S106 funding being legally signed, and income received, for example, Keresley Link Road, Shultern Lane/Lynchgate Cycle Scheme, Coundon Park and Coundon Wedge Drive schemes. This has resulted in designs/programmed works to slip into next financial year. However, the strategic approach to the S106 programme has allowed a successful bid for additional funding, i.e. Sustrans £1.4m grant award to deliver Lynchgate but has also secured additional development packages in areas such as Keresley that will bring forward additional S106 contributions and greater housing numbers.
Active Travel Neighbourhood - Earlsdon & Lower Coundon		(0.9)	Engagement work has commenced for the Earlsdon scheme, but implementation has been deferred to 2023/24 to allow time for full consideration of consultation feedback. The Lower Coundon scheme has not yet commenced engagement due to a need to co-ordinate this with the change control request for the Local Air Quality Action Plan.
CRSTS Foleshill Transport Package		0.3	The delivery of cycle works at Junction 9 of the Ring Road were more than initially estimated due to the impact of inflation on construction prices. This cost

			pressure will be managed within the overall funding envelope.
Housing Infrastructure Fund - Eastern Green		0.9	The £15.6m Homes England grant has now been fully drawn down and passported to the contractor. As part of Homes England conditions, it was a requirement that CCC is the accountable body for scheme delivery. Therefore, the remainder of the scheme value will be included within CCC accounts. Invoices will be raised to receive income from the land developer prior to passporting this over to the contractor, this ensures CCC avoid exposure to any financial risk.
Binley Road Cycleway		(2.2)	Work has been progressing well on the construction of the Binley Cycle Route, but there has been a need to review the design of one section of the route, on Clifford Bridge Road, to take account of consultation feedback. This has delayed the construction of that section of the route.
Palmer Lane Deculverting		(1.0)	Palmer Lane works have been delayed by legal processes taking longer than anticipated. Works will start summer 2023.
Growing Places		(0.4)	The Duplex Investment Fund had a lower than expected take up of grants due to economic uncertainty in 2022/23. There is a growing pipeline of businesses who are interested in Duplex Fund and further drawdown of Capital Funds is expected in 2023/24.
Vehicle and Plant Replacement	0.4		The change to the programme was due to a group of minibuses that were due on order in April, arrived unexpectedly in late March 2023.
Schools Basic Need Programme		3.0	Spend against forecast works have progressed quicker than expected on secondary expansion. Some of this is due to rescheduling last year and needing to mitigate against this on programmes. Some additional works have been required to accommodate SEND pupils which were not factored into forecasts.
Housing Venture		(0.3)	Problems with obtaining Planning Permission have stopped the majority of the projects being carried out this year.
Whitley Depot		(0.3)	Delay in commencement of demolition works due to relocation of ICT connectivity equipment and commissioning.
Disabled Facilities Grant		0.7	Accelerated spend arising from better than expected progress since Q3 in completing DFG adaptations relating to ramps, lifts and minor adaptations.
Green Homes Grant		(0.4)	Planned to spend all the grant funding by the end March in line with the grant conditions. However, BEIS subsequently extended the schemes beyond March so HUG1 is due for complete by end of this month and LAD3 is due for completion by end Sep 2023.
Tom White Waste Commercial Loan	0.5		Approved at Cabinet on 11th October 2022 this is facility A loan for material Recycling Facility, towards TWW business growth. It forms part of a £22.7m agreement.

Battery Plant & Equipment		(0.7)	Remaining funding for UKBIC project retained due to outstanding negotiations with one of the project's major contractors. It is likely that a settlement payment will be required in order to close down the contract and avoid adjudication, as well as funding for associated legal and technical advice required to resolve the matter.
Uk City of Culture / St Marys / Albany Theatre / Cultural Gateway		(1.9)	The Albany Project is progressing well but has been subject some to £1.3m of slippage due to unforeseen ground obstructions that had been discovered on site. This has meant that the team have had to redesign the drainage system to accommodate these and are working on the fit-out programme to mitigate delays to programme. The scheme is due to complete in November 2023. There is Cultural Gateway slippage of £0.3m caused by a slight delay in the commencement of the stage 4 design works, particularly to floors 5&6.
Cycle to Rail		(0.4)	Design work has been undertaken and implementation is being co-ordinated with the adjoining Liveable Neighbourhoods project. Works will be completed in 2023/24.
Interest Capitalisation	0.2		This is in respect to the accounting policy referring to the prudential borrowing costs associated with the new Collection Centre scheme. Borrowing costs, in the form of interest expenses, are capitalised where the asset in question is a qualifying asset and takes a substantial period of time to bring into operation. Borrowing costs will only be capitalised on schemes for which expenditure is incurred over a period or more than 12 months, until the asset is operationally complete, and where a material level of capital expenditure is resourced by borrowing.
Individual schemes less than £250k threshold	0.3	(0.2)	Individual schemes less than £250k threshold
TOTAL CHANGES	**1.4**	**(14.0)**	

Appendix 3

	Summary Prudential Indicators		Per Treasury Management Strategy	Actual
	Feb 22 Cabinet Report Appx 6a		**22/23**	**22/23**
	Other Sources		**£000's**	**£000's**
1	**Ratio of financing costs to net revenue stream:**			
	(a) General Fund financing costs		35,814	33,313
	(b) General Fund net revenue stream		237,379	237,379
	General Fund Percentage		15.09%	14.03%
2	**Gross Debt & Forecast Capital Financing Requirement**			
	Gross debt including PFI liabilities		366,048	328,429
	Capital Financing Requirement (forecast end of 23/24)		518,023	513,024
	Gross Debt to Net Debt:			
	Gross debt including PFI liabilities		366,048	328,429
	less investments		-55,000	-79,837
	less transferred debt reimbursed by others		-8,497	-6,666
	Net Debt		302,551	241,926
3	**Capital Expenditure (Note this excludes leasing)**			
	General Fund		145,143	146,856
4	**Capital Financing Requirement (CFR)**			
	Capital Financing Requirement		518,023	513,024
	Capital Financing Requirement excluding transferred debt		529,540	506,358
5	**Authorised limit for external debt**			
	Authorised limit for borrowing		474,362	474,362
	+ authorised limit for other long term liabilities		63,662	63,662
	= authorised limit for debt		538,023	538,023
6	**Operational boundary for external debt**			
	Operational boundary for borrowing		454,362	454,362
	+ Operational boundary for other long term liabilities		63,662	63,662
	= Operational boundary for external debt		518,023	518,023
7	**Actual external debt**			
	actual borrowing at 31 March 2023			264,777
	+ PFI & Finance Leasing liabilities at 31 March 2023			56,986
	+ transferred debt liabilities at 31 March 2023			6,666
	= actual gross external debt at 31 March 2023			328,429
8	**Interest rate exposures**			
	Upper Limit for Fixed Rate Exposures		474,362	328,029
	Variable Rate			
	Upper Limit for Variable Rate Exposures		94,872	-79,437
9	**Maturity structure of borrowing - limits**		**Upper Limit**	
	under 12 months		50%	11%
	12 months to within 24 months		20%	12%
	24 months to within 5 years		30%	7%
	5 years to within 10 years		30%	24%
	10 years & above		100%	46%
10	**Investments longer than 364 days: upper limit**		30,000	0

Prudential Indicators

The CIPFA Code imposes on the Council clear governance procedures for setting and revising of prudential indicators and describes the matters to which a Council will 'have regard' when doing so. This is designed to deliver accountability in taking capital financing, borrowing and treasury management decisions.

The Prudential Indicators required by the CIPFA Code are designed to support and record local decision making and not as comparative performance indicators.

There are eleven indicators shown on the previous page, and these are outlined below:

Revenue Related Prudential Indicators

Ratio of Financing Costs to Net Revenue Stream (indicator 1):

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet borrowing costs.

Capital and Treasury Management Related Prudential Indicators

Gross Debt and Capital Financing Requirement (Indicator 2):

The Council needs to be certain that gross external borrowing does not, except in the short term, exceed the total of the Capital Financing Requirement (CFR) in the preceding year plus the estimates of any additional capital financing requirement for the next three financial years. The CFR is defined as the Council's underlying need to borrow for capital purpose, i.e. it is borrowing requirement. The CFR is the amount of capital expenditure that has not yet been financed by capital receipts, capital grants or contributions from revenue.

Capital Expenditure (Indicator 3):

This indicator is an estimation of the Council's future capital expenditure levels, and these underpin the calculation of the other prudential indicators. Estimates of capital expenditure are a significant source of risk and uncertainty and it is important that these estimates are continually monitored and the impact on other prudential indicators (particularly those relating to affordability) are assessed regularly.

Capital Financing Requirement (Indicator 4):

As outlined in Indicator 2 above, the CFR represents the Council's underlying need to borrow for capital purposes.

Authorised Limit for External Debt (Indicator 5):

This statutory limit sets the maximum level of external borrowing on a gross basis (i.e. excluding investments) for the Council. Borrowing at this level could be afforded in the short term but is not sustainable. The Authorised limit has been set on the estimated debt with sufficient headroom over and above this to allow for unexpected cash movements.

Operational Boundary for External Debt (Indicator 6):

This indicator refers to the means by which the Council manages its external debt to ensure it remains within the statutory Authorised Limit. It differs from the authorised limit as it is based on the most likely scenario in terms of capital spend and financing during the year. It is not a limit and actual borrowing could vary around this boundary for short times during the year.

Actual External Debt (Indicator 7):

This indicator identifies the actual debt at the end of the previous financial year as recognised with the Statement of Accounts.

Adoption of the CIPFA Treasury Management Code (indicator 8):

This indicator is acknowledgement that the Council has adopted the CIPFA's *Treasury Management in the Public Services: Code of Practice.*

Interest Rate Exposures for Borrowing (Indicator 9):

These indicators allow the Council to manage the extent to which it is exposed to changes in interest rates.

The Upper Limit for variable rate exposure has been set to ensure that the Council is not exposed to interest rate rises which could impact negatively on the overall financial position.

Maturity Structure of Borrowing – Limits (Indicator 10):

This indicator highlights the existence of any large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates and is designed to protect against excessive exposures to interest rate changes in any one period, thereby managing the effects of refinancing risks.

The maturity of borrowing is determined by reference to the earliest date on which the lender can require payment.

Investments Longer than 364 days: Upper Limit (Indicator 11):

This indicator sets an upper limit for the level of investment that may be fixed for a period greater than 364 days. This limit is set to contain exposure to credit and liquidity risk.

All these prudential limits need to be approved by full Council but can be revised during the financial year. Should it prove necessary to amend these limits, a further report will be brought to Cabinet, requesting the approval of full Council for the changes required.

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Coventry City Council

Public report
Cabinet

A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains information relating to the financial and business affairs of any particular person (including the authority holding that information). The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

Cabinet	11 July 2023
Council	18 July 2023

Name of Cabinet Member:
Cabinet Member for Children and Young People - Councillor P Seaman

Director approving submission of the report:
Director of Childrens Services (Interim)

Ward(s) affected:
Properties / land to be determined however it is not deemed to have a significant impact on any particular ward

Title:
Children's Residential Children's Homes Strategy.

Is this a key decision?

Yes - The proposals involve financial implications in excess of £1m per annum.

Executive summary:

The Council wishes to establish additional Children's homes to meet the needs of more children in need of residential care within the city. This will help improve outcomes for looked after children whilst also reducing the Council's reliance on the expensive external residential market, creating overall financial savings for the Council.

A sufficiency needs analysis is a requirement of section 22G of the Children Act 1989 and statutory guidance was issued in 2010. A recent analysis in Coventry has identified the need for additional provision of residential care for children within Coventry.

Coventry City Council currently operates four Children's homes for up to 16 looked after children and commissions an additional 12 placements with private providers within the city. A further two homes have already been approved by cabinet and are in the process of being purchased/ built. The 'short stay same day' children's home is due to open in November 2023 and our first purpose-built home for looked after children with a disability is due to open in June 2024.

Working across Children's Services, finding the right placement at the right time, despite being part of a regional framework can be a significant challenge due to current market pressures. Therefore, we are often reliant on spot contract providers who may inflate costs of the placement due to the urgency to meet a child's immediate needs or due to the complexity of the child's trauma responsive presenting behaviours.

The proposal and 3-year Residential Strategy is to:

- Purchase and refurbish two further privately owned residential properties to create two homes for up to 4 looked after children in each, with trauma related emotional and behavioural difficulties.
- Build a further home for looked after children with a disability, as referenced within the approved Cabinet report from January 2022
- Consider a new build, modernised and purpose built residential short breaks home, to replace Broad Park House, with the current property being sold on Logan Road following completion.
- Embed the workforce Strategy for Children's Residential Services, with capacity to develop the existing and future work force to expand the children's home portfolio, run by the Council, improve outcomes for children and financial savings, based on the current residential market.
- The success of the Strategy will result in a decrease in future placement expenditure of c£1m per annum.

Recommendations:

Cabinet is recommended to:

1. Approve the Residential Children's Homes Review and Strategy 2023-2026 appended at Appendix 1 of this report

2. Delegate authority to the Director of Children's Services (interim) following consultation with the Chief Operating Officer (Section 151 officer) and the Chief Legal Officer to undertake the necessary due diligence (including the power to enter into any necessary legal agreement) required to facilitate the following; -

a. purchase land and build an additional children's home for the purpose of accommodating four looked after children with a disability
b. purchase land and re-build an existing short breaks children's home (Broad Park House) for the purpose of accommodating children with disabilities and additional needs

c. purchase and renovate two properties to open two additional children's homes for the purpose of accommodating looked after children whose needs are best met within this type of provision

3. Delegate authority to the Director of Children's Services following consultation with Chief Operating Officer and Chief Legal Officer to (where required) commence all necessary procurement for works or services necessary to bring into effect the recommendations set out in 1 and 2 above.

Cabinet is recommended to request that Council:

1. Approve capital expenditure of up to the sum stated in the private element of this report to be met from prudential borrowing which shall be utilised solely for the delivery of the recommendations set out in 1-3 above as well as the objectives set out in the Residential Children's Homes Review and Strategy 2023-2026 which is appended to this report.

Council is requested to:-

1. Approve capital expenditure of up to the sum stated in the private element of this report to be met from prudential borrowing which shall be utilised solely for the delivery of the recommendations set out in 1-3 above as well as the objectives set out in the Residential Children's Homes Review and Strategy 2023-2026 which is appended to this report.

List of Appendices included:

Appendix 1 - Residential Strategy 2023-2026
Appendix 2 – Equalities Impact Assessment

Background papers:

None

Other useful documents

DCSF 2010 – Sufficiency Statutory guidance on securing sufficient accommodation for looked after children

sufficiency__statutory_guidance_on_securing_sufficient_accommodation_for_looked_after_children.pdf (publishing.service.gov.uk)

Sir Martin Narey 2016 - Independent review of children's residential care [England]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/534560/Residential-Care-in-England-Sir-Martin-Narey-July-2016.pdf

Josh MacAlister, Chair of the independent review of children's social care - Transforming Care

https://childrenssocialcare.independent-review.uk/wp-content/uploads/2022/05/Transforming-care.pdf

CMA March 2022 - Children's social care market study

https://www.gov.uk/government/publications/childrens-social-care-market-study-final-report

Has it or will it be considered by scrutiny?

No

Has it or will it be considered by any other council committee, advisory panel or other body?

No

Will this report go to Council?

Yes 18 July 2023

Report title: Residential Childrens Homes Strategy 2023- 2026.

1. Context (or background)

1.1. A sufficiency needs analysis is a requirement of Section 22G of the Children Act 1989 and statutory guidance was issued in 2010. A recent analysis in Coventry has identified the need for additional provision offering care in a residential children's home in Coventry.

1.2. For some children, due to level of need/trauma, they require medium to longer-term residential care as a looked after child.

1.3. The sufficiency analysis has identified the need for additional provision to care for children in Coventry. This analysis is reinforced by a recent report by the Competition and Markets Authority (CMA) which undertook an examination of the market on behalf of the Government.

1.4. A full report was published in March 2022. It found that there was a shortage of appropriate children's home placements, that the largest market providers could be earning higher profits than the CMA would expect in a well-functioning market. The report highlighted the risk of private equity owned providers going into financial distress and ultimately having to exit the sector due to high and increasing levels of debt.

2. Options considered and recommended proposal

2.1. Coventry is already a provider of children's home provision registered with Ofsted. It is proposed that Coventry City Council opens 3 additional homes that are supported by partner agencies e.g., Health, and investigates the feasibility of exploring the purchase and refurbishment of 2 privately owned residential properties for children needing residential care to meet the identified gap in provision, alongside a further newbuild home for children with disabilities. This will future proof the Council from excessive placement costs caused by market swings such as those experienced throughout the Covid-19 pandemic and the expected economic downturn due to the current cost of living crisis.

2.2. The homes set out to address known/experienced placement challenges. The residential team will work closely with families, partners and wider services to enable children to safely return home whenever possible or move to foster care, or transition to adulthood based on their individual needs and welfare.

2.3. Additional homes will enable more children to be cared for within Coventry and the strengthening of our support to our carers through our Workforce Strategy will ensure that children experience stability, loving, meaningful relationships provided by skilled and resilient carers.

2.4. Working closely with the Placement Team and Operational Lead for Residential, careful consideration will be given to the matching of children to a home and alongside those children already living there. By increasing the options available,

we will decrease the current challenges that this often presents due to limited homes within the city.

2.5. Given the significant market pressure when we are in need of a residential children home placement, we often have limited choices and can be required to commission spot placements at high costs.

2.6. Several options have been considered to meet the identified provision gap. These are: Accessing the private market- consideration of a specific block contract for 'hard to place' children, commissioning further provision from the market or providing the provision internally.

2.6.1.1 Option 1: Use of the private market (Not recommended) - there are limited private provision of this type in the city. There are however out of city placements that are usually high-cost and involve the child moving away from Coventry's key services, family and friends.

2.6.1.2 Option 2: Use of existing block contract (Not recommended)- there has been some discussion with Coventry City Council's block providers to explore whether they are able to expand provision into this area. However, both providers have indicated that they do not currently plan to open further homes in the city.

2.6.1.3 Option 3: Commissioning further provision from the market (Not recommended) - the cost of external residential placements made by Coventry have increased by 57% in the 5 years since 2017/18. Newly commissioned residential placements over the last 12 months have risen by 73%.

2.6.1.4 Option 4: Expanding internal provision (Recommended) - Coventry has a good track record in opening and running children's home provision. It currently runs 5 children's homes, for children who need medium to long term residential care. Coventry has experience of opening and running good quality children's homes within the city.

2.7. The analysis of options indicates that providing internal children's homes is the best option for ensuring high quality provision that meets the needs of more children within the city boundary. Combining with partner agencies such as Health, we can offer more children care within the Coventry area and build upon the success of our Reunification Project & Next Step fostering.

2.8. The plan is to purchase and refurbish 2 privately owned residential properties and create a further new build home for children with disabilities, which will meet the identified gap in provision. We have clear project plans in place which will enable the us to provide further in-city, in-house provision for looked after children. With proposed additional Residential Service manager posts identified within the Strategy, they will take the lead and be accountable for the setting up and running of the homes alongside the residential Team managers.

2.9 The proposed workforce expansion also includes a Development Officer, to

strengthen our workforce offer in terms of training and development and address some of the recruitment challenges as we become an established provider of Council managed quality residential care to our children.

2.10 Increased training opportunities will not only improve the care afforded to the children, but also provide development opportunities to grow future managers and lead to the retention of staff through a career progression pathway.

2.11 As well as significant financial benefits, there are also longer-term ones associated with better matched placements that lead to reduced placement breakdown and escalation of costs, plus better education and health outcomes. This along with improved outcomes for young people demonstrates the strong value of the Residential Children Homes Strategy.

2.12 Broad Park House, short breaks children's home affords valuable support to children and their families, through regular short breaks and ongoing family support. The home has operated on the same site since 1967 and is co-located to an empty building that is costing the council continued running costs and is in need of modernisation. Due to the co-location next to a children's home, it is challenging to identify how or who this could be utilised by. The exterior of the building reflects the era in which it was built.

3. Results of consultation undertaken

3.1 There have been continuous discussions with young people, their families, partner agencies and organisations representing families who have looked after children or are on the edge of becoming looked after. There is overwhelming feedback that there needs to be more local provision for families and their children who may be in need of residential care. When needing a placement, due to lack of placement sufficiency within the city, some have had to move considerable distances to be placed in a residential children's home that can meet their needs.

3.2 When children are enabled to remain in Coventry, we can undertake intensive work with them and their families with the aspiration for them to return home if safe to do so. This is challenging if a child is placed a significant distance from the city and we are then unable to engage with them through relational based practice to find mutually agreed solutions to resolve/decrease any safeguarding concerns.

3.3 All feedback has underlined the benefit of young people remaining in the city where their families can be better involved in the child's care planning and local professionals work together to meet the child's needs. This will contribute to better outcomes for the child who is placed in the city.

3.4 In addition, there will be better outcome efficiencies for Children's Services. Having children closer to the city will mean that there will be wider savings in transportation and social worker time. It will be easier and quicker to visit children who are based in our own homes. Staff at the home will use the same recording system as the allocated social worker meaning that communication is more efficient, and the needs of children can be identified more easily and met more quickly.

3.5 Working closely with Health, we have seen a significant rise in the number of Children with mental health & emotional wellbeing needs, becoming looked after children. Many need Child Adolescent Mental Health Services (CAMHS) assessments and ongoing support and with our strong established relationship with CAMHS, each home has a designated CAMHS support and can ensure the right support at the right time is provided. In addition, our strong partnerships with health mean we can access services more swiftly within the city, when they are needed.

3.6 Working closely with the Virtual School & SEND, we can ensure children's Educational needs are met and that they are supported quickly to achieve their full potential, which can be a challenge when working with SEND departments for children placed at a distance.

3.7 Our Social Workers tell us that their preference is always for a child to be placed within a Council run children's home. Our homes do not 'serve notice' on children's placements, however, will work with Social Workers and Education to identify a planned move if it is deemed that their needs could be met more effectively elsewhere.

3.8 Broad Park House move proposal- further consultation will be undertaken with parents, carers, staff and professionals in regard to the proposed move and the rationale behind this.

4. Timetable for implementing this decision

4.1 Once approved recruitment will commence for the first service manager, to support the recruitment of staff, including two Registered Managers and the Residential Development Officer.

4.2 The Strategy proposes a staggered timeline of opening news homes to enable staff recruitment, training and Ofsted registration timelines to be achieved. The aim is for the proposed homes to be opened over a 3-year period.

4.3 Each homes development project will have a 'working group', ensuring timelines are met and risks mitigated.

4.4 These will be monitored regularly though a project management oversight group, chaired by the Strategic Lead for Looked after Children, with reporting from the Operational Lead for Residential and other departments including finance, legal and property services colleagues. There will be regular reports on progress to the Cabinet Member for Children and Young People and Corporate Parenting Board.

5. Comments from Chief Operating Officer (Section 151 Officer) and Chief Legal Officer

5.1 Financial Implications

5.1.1 The financial requirement for the total Residential Strategy shows the split between Capital investment and Revenue costs set against the existing resources. It shows that upon implementation of the whole strategy savings of c£1m will be achieved

against the Children's Services placements budgets. Further information is provided in the private element of this report.

5.1.2 The first two homes for Children with Disabilities and the Short Stay/Same day home have already been through Cabinet approval and the service have successfully identified grants to support a significant amount of these two projects.

5.1.3 Capital funding

5.1.4 This report seeks approval to proceed with the remainder of the Strategy. Capital resources (the sum stated in the private element of this report will be required) in order to open the three further homes and replace the existing short breaks home with a new one, and although the service will be actively seeking grant opportunities at every stage of the Strategy to support the expenditure it is currently assumed that this will need to be met from Capital Borrowing and potential capital receipts.

5.1.5 The planned profile of the capital spend for these properties are set out in the private element of this report which will add new assets to the Council's property portfolio.

5.1.6 Revenue Funding

5.1.7 There will be ongoing costs associated with operating each residential home, including staff costs, finance costs and other general running costs such as groceries and utility costs. Further details on these costs are set out in the private element of this report.

5.1.8 In addition, there is a need to strengthen the infrastructure of support available across the internal homes. This group of staff will ensure the effective running and ongoing improvement of the homes. The total cost of this is set out in the private element of this report.

5.1.9 Growth of the Council's internal residential provision will lead to reduced spend on spot and framework beds. The total expenditure on placements that would be replaced by this Strategy once all homes are fully operational is set out in the private element of this report.

5.1.10 If all projects reach completion within the planned timeframe shown within section 9.2 of the attached Strategy, and achieve the expected savings against the current expenditure, the full year impact on the service will be savings of c£1m per annum by 2027/28.

5.1.11 Significant savings attributed to this Strategy have been included within the budget setting process for 2023/24. The prioritisation of these projects has shifted from this 2023/24 budget setting estimate due to DfE grant opportunities and exploration of the external property market. It has also been possible to include more detail regarding investment costs and short-term budget pressures attributed to implementation periods when opening a new home.

5.1.12 There is an updated 5-year financial plan surrounding this Strategy and compares this to the figures included within the 2023/24 MTFS. The detail behind this updated financial plan is shown within the strategy document included as an appendix.

5.1.13 This will be kept under continuous review by the Project Board and will be subject to change if any of the projects change their prioritisation in the timeline or incur any slippage

5.2 **Legal Implications**

5.2.1 The Council has a general duty to looked after children under Section 22 (3) of the Children Act 1989 to safeguard and promote their welfare. Additionally, Section 22G of the Children Act 1989 (Section 9 of Children and Young Persons Act 2008) requires the Council to secure, where reasonably practicable, sufficient accommodation for looked after children and those whose circumstances make it consistent with their welfare to provide them with accommodation within their local authority area.

5.2.2 To ensure compliance with the statutory requirements under the Children's Homes (England) Regulations 2015, governance around the operation of the children's home will be required to ensure registered managers are appointed to oversee the operation of the children's homes, as well as appropriate quality assurance arrangements, are in place for monitoring.

5.2.3 As defined in Section 1 of the Localism Act 2011, a Council is empowered to do anything an individual may do, whether or not normally undertaken by a local authority.

5.2.4 It is the responsibility of the Council to ensure that any procurement is conducted in compliance with the Council's policy and legal obligations, including the Contract Procedure Rules, Public Contracts Regulations 2015, and Subsidy Control Rules. This will be facilitated by relevant officers.

6 Other implications

6.1 How will this contribute to the One Coventry Plan?

https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan

The initiative will contribute to the Council plan in the following ways:

6.1.1 Increasing the economic prosperity of the city & region: The opening of new homes will increase employment opportunities, with the children's residential services employing over 130 staff, with training & development opportunities and a clear career pathway.

6.1.2 Improving outcomes and tackling inequalities- providing care to more looked after

children within the city, including those with a disability. Locally committed- the homes will protect some of the city's most vulnerable children, keeping them local to meet their needs and make sure that they continue to have regular involvement with their family and services. It will engage local partners so that the health and wellbeing of this group of children will be significantly improved.

6.1.3 Continued financial sustainability of the Council Delivering our priorities with fewer resources- the opening of additional homes will make savings on the Children's Services Placements budget. This has been demonstrated through an effective cost/benefit analysis and business case. It will add social value to the communities in which the homes are located. The needs of children are at the heart of this initiative.

6.1.4 Family Valued- working with the children and families of Coventry, who are in need of support, our homes will maintain relationships and where possible, support children to return to the care of their parents, through reunification, if it is safe to do so.

6.1.5 Managing performance and managing progress- the homes will be subject to significant scrutiny and governance as they are registered with Ofsted. Once registered, the homes will be subject to significant quality oversight including monthly assessment by an independent visitor and inspection by regulatory inspectors, Ofsted, in accordance with regulation. The additional Service Manager's will have a leading role, undertaking quality assurance tasks, working with Registered managers to achieve excellence.

6.1.6 Tackling the causes and consequences of climate change (please refer to 6.5)

6.2 **How is risk being managed?**

6.2.1 Robust governance processes are proposed that will make sure that any emergent risks are identified and mitigated at the earliest opportunity. The underlying outcome is that children's homes open within agreed timescales. This will include representatives from across the whole of the Council who are involved in the delivery of the project. These will be coordinated by the Strategic Lead for Looked after Children.

6.2.2 There is always a level of risk operating a children's home in relation to matching children who can live alongside each other, workforce challenges and reputational risks. However, as Coventry has a good track record running children's homes while working closely with Ofsted, it is anticipated that any risks can be ameliorated through robust management and active leadership.

6.3 **What is the impact on the organisation?**

6.3.1 The initiative is a key pillar of the Council's corporate parenting responsibilities. Opening further children's homes in the city will provide children with high quality provision within the city. Operating these homes will mean improved placement choice for children with complex needs. The registered managers will work closely

with our partners and the wider services to ensure children access the right support at the right time.

6.4 **Equalities / EIA?**

6.4.1 An Equality Impact Assessment has been completed and is appended at Appendix 2 of this report.

6.5 **Implications for (or impact on) climate change and the environment?**

6.5.1 The plans to refurbish new homes will take account of all current building regulations and will be 'future proofed' to meet all environmental regulations. There will be close liaison with the Safety, Health, Environment and Quality Manager to identify the best ways of minimising any impact on the environment from any renovations.

6.5.2 Coventry City Council has secured ERDF funding towards the installation of Solar PV on the existing residential children's homes, which was completed in March 2023. There is therefore potential to expand the scheme should additional funding be provided as part of the refurbishment projects. This would further reduce the carbon emissions associated with the proposed purchase of any additional property.

6.5.3 Emissions related to travel will reduced by more looked after children being cared for in the city, as professionals and families will not have to travel long distances to see them.

6.5.4 Significant consideration is given to the impact on the environment when undertaking a new build, through careful planning and appropriate ecological surveys. Newly built properties will comply with current legislation, with new energy efficient heating systems, solar panels and insulation. Gardens will have wild-flower areas to support pollination and herb/ vegetable gardens.

6.6 **Implications for partner organisations?**

Partner agencies are required to provide ongoing services to children who are looked after. This includes health services and education provision. Feedback from all partners is that it is easier to deliver high quality services when children remain within to the city. It is anticipated that any new home opened by Coventry City Council will be located within the city boundary. This means partners will be in a better position to meet children's needs, improve their health and education outcomes and support families.

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Residential children's homes review & strategy

(Public report.)

2023- 2026

"Children remain at the heart of what we do and at the heart of Coventry City Council's residential homes for children".

Coventry City Council

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1. Introduction

In 2017, Coventry Children's Services embarked on a residential redesign. At the time there were 3 residential homes for children operated by the council, 2 homes for children with emotional and behavioural difficulties and 1 home offering short breaks to children with a learning disability.

The redesign involved the sale of The Grange and with the proceeds of this, the purchase and creation of 3 new family type residential homes for looked after children. This was an ambitious project, that enabled up to 12 additional children to remain living within Coventry, close to their families and communities, with improved outcomes and financial benefits, compared to some children living at a distance in residential care.

At the time, Broad Park House short breaks home moved from being managed by the children with disabilities team to the Operational lead for Placements.

By August 2019 all 5 homes were operational, and as of June 2022 all judged as 'Good' by Ofsted following an inspection.

This document aims to:

- Ensure a Council wide understanding of the current trends in commissioning residential care in children's homes and the factors contributing to these.

- Understand the needs of children and young people being referred to or accessing residential care and the current challenges in meeting these needs.

- Identify key recommendations to shape the future of service delivery and provide a potential solution for the changes needed to offer more children a safe and secure home within the city, resulting in outstanding services for children.

2. Sufficiency

Coventry Children's services are committed to ensuring that children remain living with their families, whenever it is safe for them to do so.

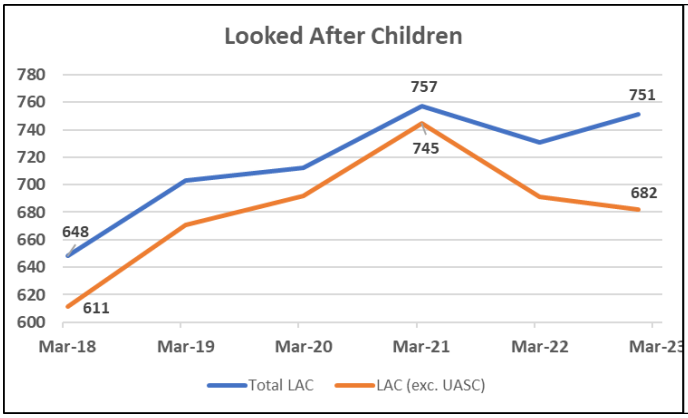
Broad Park House continues to offer residential short breaks to children with a disability, enabling them and their families to have time apart and the children to have opportunities to engage in activities and build relationships with peers.

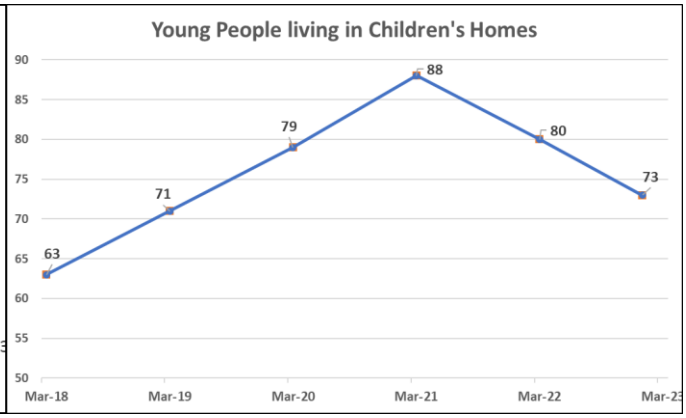
As required by the Sufficiency Duty[1] Local authorities are required to ensure so far as is 'reasonably practicable', that there is sufficient accommodation within their area to meet the needs of its children in care.

If a child does need to become looked after, we will seek to support them to live with a 'connected carer' whenever this is possible and safe to do so. Only if the need is assessed for a child to live within a children's home, should a residential children's home be considered.

[1] Department for children, schools and families: Sufficiency Statutory guidance on securing sufficient accommodation for looked after children
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/273812/sufficiency_-_statutory_guidance_on_securing_sufficient_accommodation_for_looked_after_children.pdf

At the time of the residential redesign in 2017, following a needs analysis, it was deemed that the 'market' within Coventry could meet the needs of children, alongside the opening of the new homes, block contracts and commissioned placements further afield. This was based on the drive to reduce the number of children in care and living within a children's home. However, the number of children in care and residential care, has not reduced.

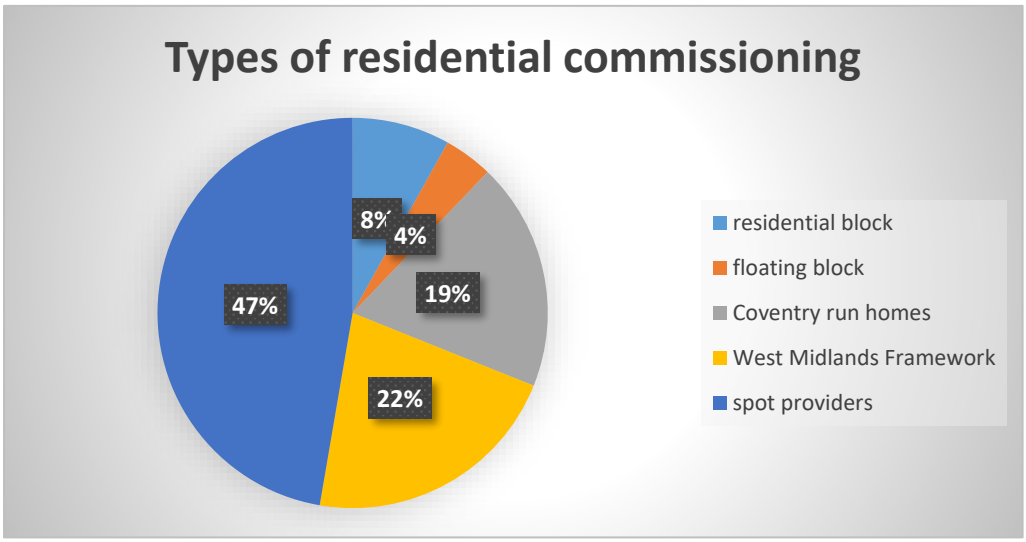




Research undertaken by Ofsted in 2022[2] noted, '*how challenging it is to provide sufficient care for children, particularly for those whose needs are complex. There simply being a vacancy in a children's home reasonably near to where a child currently lives does not mean that the home can meet the needs of that particular child.'*

Despite being a part of the West Midlands regional framework for residential care, there has been an increase in the need to use 'spot providers', as often framework providers do not respond via the portal in a timely way, and some have chosen to remove themselves from the regional framework. In December 2021, higher numbers of placements from spot providers were being commissioned.

As of the end of January 2023:



A significant number of the providers offering care to Coventry's children in children's homes are spot providers who do not have an agreed fixed price and costs can fluctuate significantly.

[2] Ofsted: Why do children go into children's homes? [published 13 April 2022]
https://www.gov.uk/government/publications/why-do-children-go-into-childrens-homes/why-do-children-go-into-childrens-homes

Over the last 5 years, there has also been a significant shift in the 'private market' being able to meet the needs of children and a significant rise in the costs of residential care. Often providers inform us that they have multiple referrals for a placement and increasingly request payment of a retainer to secure a planned move for a child.

The Competition & Markets Authority (CMA) published a report: Children's Social Care Market, Final Report (2022)[3] and found: *that local authorities were too often unable to access appropriate placements to meet the needs of children in their care. Second, that the prices paid by local authorities were high and this, combined with growing numbers of looked-after children, was placing significant strain on local authority budgets.*

The summary of findings identified:

- *a lack of placements of the right kind, in the right places, means that children are not consistently getting access to care and accommodation that meets their needs*
- *the largest private providers of placements are making materially higher profits, and charging materially higher prices, than we would expect if this market were functioning effectively*
- *some of the largest private providers are carrying very high levels of debt, creating a risk that disorderly failure of highly leveraged firms could disrupt the placements of children in care*

Within the last 9 months, there has been a significant rise in the cost of newly commissioned children's residential care

The findings noted in the DfE publication '**Stable Homes, Built on Love: Implementation Strategy and Consultation. Children's Social Care Reform 2023**[4] states: *to reinforce that cost does not improve outcomes- Local authorities are paying excessive amounts for some children's care, but this does not always result in better outcomes. Some care providers are making excessive profits as a consequence*'.

A number of providers have requested uplifts in the last 2 months, ranging from 10.1% to 35%.

Furthermore, the DfE's response to the Care Review identifies that children often live too far away from where they would call home, which can increase the barriers they may face when leaving care and that those children that are able to maintain their educational placement, community links and healthy family relationships have improved outcomes.

As of the end of January 2023, 73 children were living within a children's home, only 23 of them lived within Coventry.

The new Coventry Children's Services Sufficiency Strategy identifies the need for more residential children's homes within Coventry. Despite having contracts with 2 providers within the city to care for up to 12 children and the homes run by the Council offering care to up to an addtional16 children, too many children are living too far away.

The options within Coventry for looked after children with a disability have diminished since the redesign and there is currently not a home within the city to care for these children. As a result of this, a Project Initiation Document was written and subsequently approval was sought and gained from Cabinet to open a home for

[3] CMA Competition & Markets Authority; Children's Social Care Market Study: Research and Analysis Final Report [updated 22 March 2022]
https://www.gov.uk/government/publications/childrens-social-care-market-study-final-report/final-report

[4] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1133537/Children_s_social_care_stable_homes_consultation_February_2023.pdf

Children with Disabilities in January 2022. This is expanded in the Response to sufficiency challenges within section 4 of this strategy.

3. Review of Coventry's Residential Redesign July 2021

A full review of the residential children's homes redesign was undertaken in July 2021, with contributions from the Transformation Team, finance business partners and the operational lead for placements. Key findings from the evidence-based report found:

The anticipated benefits to our children have materialised …and we have seen examples whereby:

- Some children were enabled to move back into the city from out of the area
- Some children have been prevented from going out of the area when we expect the previous model would have seen them homed out of city.
- Many children have experienced placement stability
- Children have maintained their educational placements and when appropriate, been supported by our SEND services.
- Children have been supported to attend college and have gained employment locally.
- Children have been supported to maintain family & community links
- Children have been consulted and involved in the recruitment of Operational Leads, team managers & residential staff. They have participated in Voices of Care & Corporate Parenting Board.
- Children have not been criminalised as a result of being in our care
- Children have been supported to establish and maintain Lifelong Links
- Children have been enabled to move to supported accommodation when it is the right time for them and in a planned way. They have had the opportunity to experience the training flat. They receive ongoing informal support from the homes.

The project, and subsequent follow up activities have helped to improve many areas of the service, including:

- Mitigating hidden costs such as SW/IRO travel and time costs
- Linking with our own local services e.g., Horizon, local Police, CAMHS (designated leads associated to each home)
- Transitions to supported accommodation are planned and young people can experience the training flat prior to moving
- Implementation of the LCS Residential Workspace which enables children's records to be stored in one place and social workers have immediate access. This has improved the service for our children as it enables quicker and better-informed decisions, and also mitigates the risk of any information breaches.
- A consistent suite of policies and procedures has been developed to apply across all of the homes.

The report also identified areas of learning and where further developments were still needed. It also identified at the time, that the although the unit cost had decreased for the Council compared to before the redesign, they were not 'financially' competitive to the costs of block and framework commissioned placements i.e., higher than anticipated.

The key findings from the report and the ask from the Children's Services Leadership Team at the time included:

- Ensure that learning is taken forward to help inform the work on acquiring a home for Children with Disabilities.
- Consideration to be given as to whether the Council would consider opening further homes to meet the needs of more children within the city

4. Response to Sufficiency Challenges

As part of the Coventry Family Valued program, there remains a drive to ensure that children remain living with their families, wherever it is safe for them to do so. In partnership with Leeds, Children's Services has been embedding relationship-based practice and working restoratively with families to achieve change where needed. Workstreams have focused on several areas including SGO's and connected carers and the Reunification Project.

The Fostering Recruitment Strategy seeks to increase the number of foster homes available to Coventry's looked after children and build upon the strengths and resilience of carers. In addition, the 'step down' from residential care and 'next step 'carers schemes aim to decrease the number of children living within a children's home, whose needs could be met within a foster family.

Opportunities are being created through a number of multi-agency forums, including the One Coventry plan and Child Friendly Cov to increase links with partner agencies and develop a better understanding of the needs of children and their families to identify collaborative solutions.

The monthly Sufficiency Steering group oversees the progress of children's services response to tackle challenges in meeting our sufficiency duty and ensuring children have the right care and support in the right place, at the right time.

4.1 Sufficiency steering group

A monthly meeting is chaired by the Strategic Lead for Looked after children (corporate parenting) and attended by colleagues from across the service:

- Strategic Leads for Looked After Children [Corporate Parenting], Help and Protection, Looked After Children [Practice], QA Performance & Commissioning
- Operational Leads for, LAC & Permanency, Childrens Disability Team, Fostering, Through Care & Edge of Care, Placements, Children's Residential Services, Commissioning & Partnership, QA Performance & Commissioning
- Commercial Lead for Children's Services
- Senior Commissioning Officers & Commissioning Officer, QA Performance & Commissioning
- Financial Management Lead Accountant, Business Partners

The group considers current challenges in relation to sufficiency & identifies potential strategies and actions to address these. Members of the group are accountable for key areas of development and report back on progress. A RAG rated action plan is reviewed at every meeting, and as a group agreement is reached as to how best address mitigating factors. This involves collaborative governance where roles are defined, and goals understood in terms of multi project management to address sufficiency challenges and improve outcomes for children, young people and their families.

4.2 Home for looked after children with disabilities

Following the needs analysis highlighted in the Residential Redesign Review, there was an agreed necessity for a home for children with disabilities within Coventry. The only placements available were outside of the city or in private provisions where there were concerns regarding the level of care that was offered. There were also significant costs related to the individual care being offered to each child, which reinforced the business case.

A 'One Coventry' project group was established in June 2021 to explore possibilities and the completion of a PID. It was identified that the estimated cost to refurbish an existing property. The opportunity to submit a bid to the DfE for 50% of the capital funding in the autumn of 2021 was undertaken, however this was unsuccessful.

Building upon the learning from the bid and the continued need for a home for these children, an options appraisal was undertaken, resulting in Cabinet's approval for a purpose built, energy efficient new build, with the identified costs being met from the Disabled Facilities Grant (DFG).

Cabinet also approved the scoping of a second home, based upon the number of looked after children identified with a disability who needed residential care.

In brief the project parameters include the following:

- The home will provide care and support for up to 4 children up to the age of 18 and enable them to develop increased independence skills, planning with them to either return to the care of their family, a foster family, or a more independent placement as they reach adulthood.
- Children will be supported to maintain their links to their local communities, education, and health support services.
- To work closely with established partners to ensure needs are met and looked after children have priority access to services when needed.
- The proposed property will provide flexibility and enable 1 of the 4 children to live with an increased level of independence, as appropriate to their needs and abilities.
- It will be their home medium to long-term, reflecting their current care plan and ensure a seamless transition to adult and care leaver services as appropriate.

Children with Disabilities (CWD) Home Project 1 – Headlines of Commercial & Financial Business Case

Cabinet approved this project on 11th January 2022 and were informed of the rise in costs and intention to switch the project from a refurbishment to a new build in the Financial Monitoring Report dated 30th August 2022.

This project will see the design and build of a bungalow to create a purpose-built home for 4 disabled children. Following a search, land was identified and purchased on the Pear Hyde site in July 2022. In January 2023, engagement with an architect commenced and plans are being agreed for a purpose-built home that can meet the needs of the children, whilst ensuring it creates a homely environment.

The project is progressing at pace and design work is currently being undertaken prior to a planning application process. It is anticipated that this new build will be completed ready for Children's Services to occupy the space by July 2024.

Costs communicated to cabinet regarding this project in August 2022 have increased due to a rise in professional consultants fees, the market's reaction to inflation and several reasons for this including:

- There has been a significant increase in costs due to exponential rates of inflation in the last 12 months, including, labour, materials, and ground preparation.
- The estimate was produced using theoretical site and build costs. A site has now been chosen (Dorchester Way) and a detailed design produced for a purpose-built home for the disabled children. Dorchester Way has some unforeseen complications within the site, including a main sewer pipe, and 2 trees that have protection orders on them. This has meant the design of the building has needed to accommodate these issues which has resulted in increased design fees and building costs.
- The land is near the City Hospital, and on-road parking is not possible. The children's home will require circa 7 parking spaces to accommodate residents, staff, and visitors. Due to the lack of local parking opportunities the site design has had to accommodate this within the plans. Again, there is a cost associated with this, that was not considered in the initial estimate.

- The site also has an existing care takers bungalow that has been condemned for demolition
- The Council's commitment to the Green Futures Strategy has also meant the project has included both solar panels and an air-flow heating system as part of the specification to the new build resulting in additional costs. Whilst the project will recover these costs over time though savings in gas and electricity bills, this is a capital cost that did not form part of the original build estimate.

The project timetable currently suggests a two-year timetable, with delivery in July 2024, as summarised below

Project Start Date	Estimated Project Duration	Estimated Completion Date
October 2022	21 months	July 2024

Capital Assumptions

- This additionality has been communicated to Cabinet Member for Children's Services

Revenue Assumptions

Current assumptions are the capital requirement would be financed through borrowing over a 30-year period, with repayments funded by current budget arrangements in replacement of expenditure on external placements.

Despite the increase in estimated costs to complete the build of this project, this new home is projecting cost avoidance

These potential commercial returns are subject to a range of factors, including occupancy, staffing and Ofsted requirements and a learning analysis of recent projects.

Year 1 will incur costs during the implementation phase as the home is set up, staffed, and assessed by Ofsted before children can be introduced into the home. Therefore, full occupancy will not be achieved immediately. It is anticipated that the first full year of savings will be recognised in year 2 of the project following implementation.

The project planning team meets fortnightly to discuss progress with the professional teams and assesses financial performance against budget to ensure business case projections are still relevant and realistic.

4.3 DfE Grant Bids.

During 2021 and 2022, opportunities have been taken to bid for funding in relation to capital costs for the setting up of new homes and for Staying Close. Although the first bid to the DfE in September 2021 for the home for children with disabilities was unsuccessful, 2 further bids were awarded in 2022. Learning from each bid has been used to inform the next which has resulted in additional funding of more than £1.6m being awarded for 2 projects to improve our offer to children in and leaving residential care for the period up to 2024/25.

- Staying Close £1.0m
- Crisis Resources Home £0.6m

4.4 Short stay children's home

As highlighted in section 2 of this strategy, there has been a significant challenge in finding homes for looked after children, which can be further compounded if they are needed at short notice or are unexpected e.g., Police Protection Order.

Through discussions within the Sufficiency Steering Group, Children's Services Leadership Team (CSLT) and Family Valued Board it was recognised that a further resource was needed to respond to sufficiency challenges and to further support the family valued approach.

- Although Coventry's Fostering service provides 'emergency foster carers', the complexity of the needs of some of these children means that these carers are not always able to offer care to some children.
- Building upon embedding the Coventry Way, working with families, it was identified that at times 'space' for families, particularly those with young people in adolescence, can enable intensive support to be put in place, to find family led solutions including FGC's and with support from the Edge of Care team.
- Having time to find the right home for a child who needs to be looked after can prevent multiple moves and increase the likelihood of stability whilst in care. The need to find homes for sibling groups can also be challenging.
- Young people admitted to ward 14, via A&E, presenting with mental health and emotional wellbeing needs, could experience delayed discharges from hospital whilst support or care needs were being sourced.

When the opportunity arose in September 2022, a bid was submitted to the DfE under its Children's Home Capital Fund programme for a home to address some of the needs identified. The bid was for 50% match funding between the Council and the DfE. In November 2022 Children's Services received notification from the DfE that the bid was successful and in the same month Cabinet approved acceptance of the grant and Capital borrowing for the 50% match funding.

This new short-term residential home will provide real value by giving the services extra time to put support in place for children and families when needed. Through a collaborative review of needs and risks, consideration can be given to plan for whether a child returns/ remains at home with family, enters foster care or a more suitably matched residential children's home, or is assessed as being ready for supported accommodation

Short Stay Same Day Home - Headlines of Commercial & Financial Business Case

Due to the nature of the children that require this type of support and care, they are invariably homed in costly spot placements.

It is anticipated that this project will be completed ready for Children's Services to occupy by November 2023. This is summarised in the table below:

Project Start Date	Estimated Project Duration	Estimated Completion Date
February 2023	9 months	November 2023

Capital Assumptions

The service have secured capital grant funding to support the opening of this home, through wave 2 of the Children's Home Capital Programme. Match funding has been awarded and the service will use capital borrowing to match this, for a 5-bed property.

This capital estimates are based on the following assumptions:

- A suitable home being on the market
- Minimal building works needed

Revenue Assumptions

Current assumptions are that 50% of the capital cost of the project will be financed through borrowing over a 30-year period, this will require repayments funded by current revenue budget out of cost avoidance on external placements fees.

It is estimated that the home will have a 75% occupancy rate meaning an average of 3 out of 4 beds will be occupied at any one time.

As the home will reduce entries to care or increase the likelihood that a fostering placement will be made, it is expected that significant placement costs will be avoided, although the nature of the placements makes it difficult to quantify the cost avoidance opportunities.

The Business case assumes that the running of the home will be funded from existing placement budgets on estimates that 3 or 4 children are prevented from needing to enter care each year.

The performance and impact of this home will regularly be monitored and reported to CSLT.

The introduction of this provision as a short-term/ same day home for children is projecting a savings assuming a 75% occupancy rate.

The project launched in January 2023, with a property being identified in Coventry and initial surveys and market valuation are being undertaken. A One Coventry project team has been established who is determining the best route to progress the project ensuring both the financial aspirations of the strategy are met alongside the desire to provide the children with a suitable and inviting home environment.

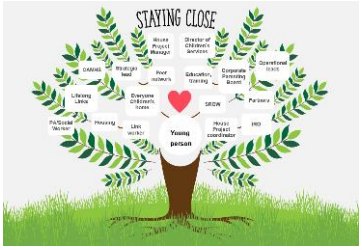
4.5 Staying close

To enhance the support to children leaving residential care and to care leavers, an expression of interest (EOI) application was submitted to the Department for Education in April 2022 on behalf of Coventry Children's Services to be included in the national rollout of 'Staying Close' arrangements.

The bid was successful with the grant awarded in July 2022, covering a three-year period with funding of circa £1.1m.

Staying Close arrangements are implemented to support young people leaving care from residential Childrens homes, building upon the success of the House Project, Lifelong Links and the training flat. The aim is to ensure that these young people experience the same support and opportunities as those who are eligible to remain in their foster care placements under the statutory 'Staying Put' arrangements.

The funding for the project has created 6.5 additional posts, (these include 4 senior residential childcare workers) with the expectation that support is offered to approximately 26 young people over the next 3 years. A measure of success of the project will relate to enabling young people to move to independence with additional support, sooner than may have previously been viable and that children maintain meaningful supportive relationships with their caregivers and build a network of support. In addition, this will create a cost saving against the budget and it is hoped, fund the project going forward.



5. Workforce strategy

5.1 Recruitment

Since the residential redesign, there has been ongoing recruitment for the residential service. An additional 30+ staff needed to be recruited to enable the homes to open including deputy managers and managers and in addition some staff have moved on.

Due to the Residential Childrens Worker (RCW) role not initially requiring candidates to be qualified, there is often a high number of applicants, however the majority of these do not have any experience in working within a children's home and many have no experience in working with children and young people.

Through a robust recruitment process we strive to appoint staff from a wide range of backgrounds, with transferable skills that reflect the demographics of the communities within Coventry.

All managers and deputies undertake interviews, with the chair of each panel being trained in safer recruitment and Recruiting for a Diverse Workforce. We have worked closely with the Recruitment Team to improve the recruitment process.

If candidates are successful following their interview panel, they are then invited to one of the homes, to meet with the children and young people and gain further insight into the role. Feedback is sought from the children, which then contributes to the decision as to whether the candidate would be offered the post, subject to schedule 2 checks as required by the Children's Homes Regulations (2015)[5].

In January 2023, a recruitment evening took place, whilst an advert was published to recruit further staff. This was well received with 60 applicants expressing and interest and approximately 30 candidates attending and as a result several candidates who attended, applied and were shortlisted. 4 candidates that attended the open evening have been offered a post within one of Coventry's children's homes. Future recruitment evenings are planned throughout the year.

Challenges**:**
Managing the recruitment process requires significant resources, with as many as 150 applications being submitted that require shortlisting, with potential group interview assessment days taking place when shortlisting numbers are high.

When we have sought to recruit to the Registered Manager role, there have been few applicants. It is recognised that there is a national shortage of residential managers, therefore our focus needs to be to invest, up skill and 'grow our own' managers for the future.

The majority of new staff have no experience of working within a children's home previously. There is a need to build a skilled and resilient workforce, who place the children in their care at the heart of what they do. There are challenges nationally in recruiting staff, as referenced within the Care Review, with the DFE [2022] response in March recognising the *'need to ensure we have a stable and skilled workforce in children's homes'.*

In order to attract staff to Coventry's residential homes and retain them, we must offer training and career development opportunities and a high level of support to staff, who work in an environment that is both rewarding and challenging. The demands of the role require staff to work shifts, weekend and bank holidays, to build resilience and be proactive to meet all of the individual needs of children in their care.

5.2 Residential redesign review- July 2021.
Through the residential redesign review in 2021, key challenges in relation to the workforce included:

[5] Children's homes regulations, including quality standards: guide
https://www.gov.uk/government/publications/childrens-homes-regulations-including-quality-standards-guide

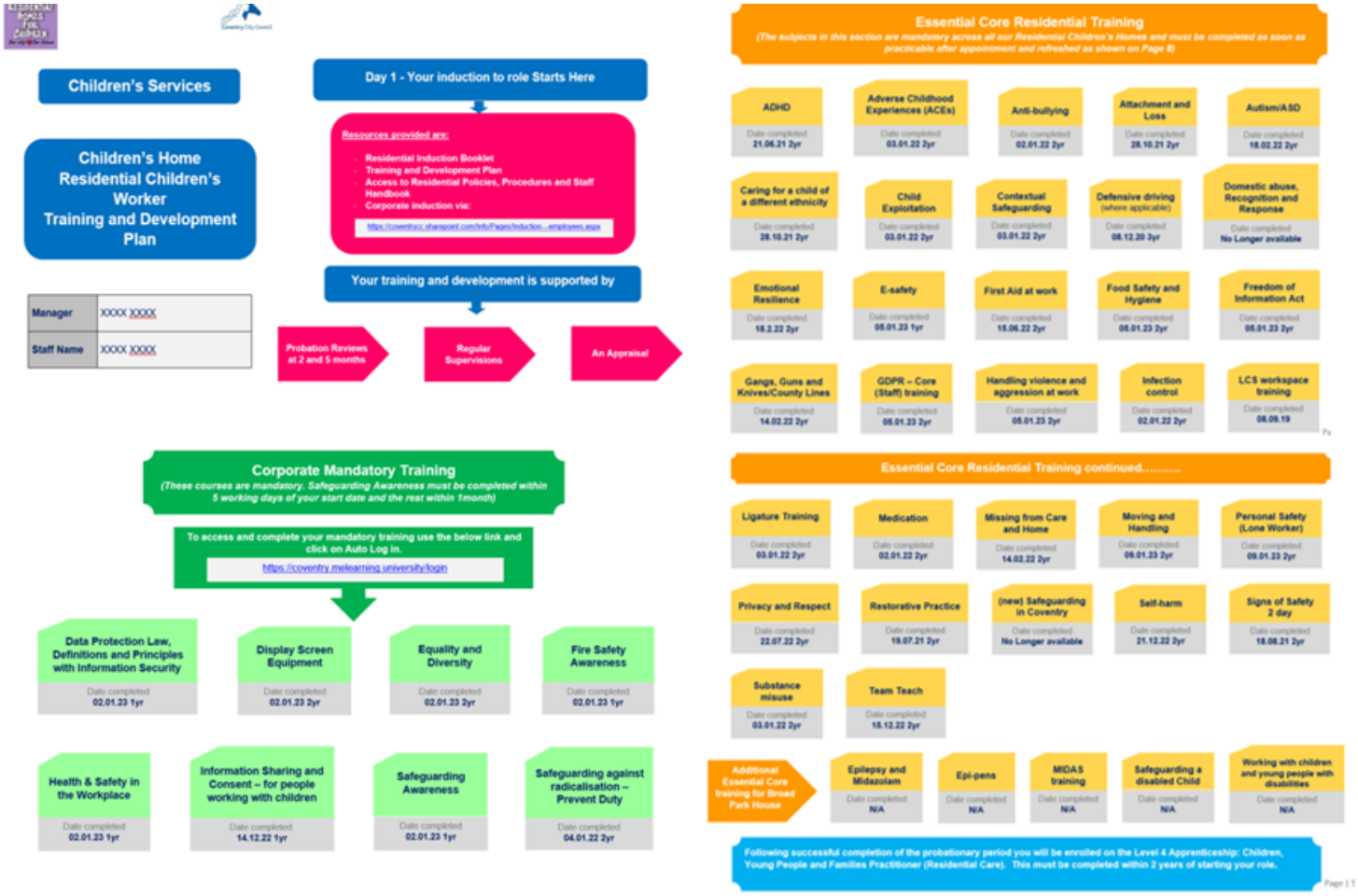
- Workforce development. There was an assumption that staff that transferred from the previous model had the skills to adapt/ meet the demands of the 'new role', and this was not always the case.
- Deputies post did not exist in the same way- no residential specific training & development program- significant shift from the role of team leader to deputy in terms of accountability & expectations
- Rotas. the example model: the rotas did not allow for planned absences such as training or annual leave or the consideration of the Working Time Directive. It also made an assumption that staff would agree to be on standby sleeping in duty with no cost considerations.
- Assumption that all staff would be willing to be more flexible with rota changes to account for planned absences- leave, training etc- rather than having to work with a fixed rolling rota

Several actions have been taken to address some of the challenges, which include:

5.3 Training & development

- There were significant challenges to accessing training during COVID and therefore monthly online practice development/ training sessions were offered to staff to address some shortfalls. These remain ongoing, alongside accessing training via the Council and AC Education.
- Training has to be responsive to ever the changing needs of the children living with the homes and therefore a library of training resources and links to websites has been set up on the residential SharePoint site.
- Through training, supervision and reflective practice, staff are being upskilled to meet the needs of the diverse children in their care. Supervision includes discussions regarding the impact of working within a children's home and consultations with CAMHS take place to enable staff to take a more 'trauma informed' approach to working with the children in their care.
- Staff have annual appraisal, which identify strengths and areas for development for the next 12 months.
- Training, such as PACE has been delivered to some staff.
- All staff are required to attend Team Teach training to support in the de-escalation of challenging behaviours. We have invested in over 6 staff becoming trainers for Team Teach, with annual training licence renewals.
- All deputies have been supported to undertake the level 5 in leadership and management through the apprenticeship levy, alongside taking a lead role for Team Teach. Quarterly deputies' meetings take place to discuss performance challenges and as a supportive reflective practice workshop. Key responsibilities have been identified such as Weekly Annex A completion.
- Continued to build on restorative and relationship-based practice and embedding the tools from Signs of Safety into evidence-based practice.
- Electronic recording is now completed on LCS, through intensive support and work with the Business Systems/ LCS team, bespoke recording tools are in place. All staff have received LCS training and contribute to ongoing improvements in recording.
- All staff from within the homes now have a laptop. Recording tools are now universal to all the homes, enabling staff to provide the evidence needed to meet the children's homes regulations and work more efficiently across homes as recording requirements are the same.
- Childrens individual placement plans focus on the Signs of Safety methodology, which all staff have received training in.
- Each home has a training tracker and each member of staff an individual 'training passport'.

Exemplar of individual training record



Challenges:

Further consideration is needed as to how we strengthen the skills and abilities of all staff to further improve the outcomes for children living within the homes.

The monthly practice development forums create additional pressures on managers to write and deliver the training, alongside challenges with staff attendance due to rotas.

Unfortunately, some mandatory training still needs to be 'purchased' from providers to ensure staff and homes can meet the regulatory requirements and the needs of children in their care. There are ongoing discussions with the Safeguarding Partnership and health to ensure training can be accessed at the right time, where available.

We have faced challenges from Ofsted inspectors in relation to the timeliness of training being completed and accessing the right training at the right time. Currently there is not a specific training budget allocated to meet the needs of our residential workforce, with courses being funded from homes individual budgets when needed.

Further work is being undertaken on a Childrens Home Training Strategy to ensure that all staff and managers benefit from core, mandatory and enhanced learning and development opportunities to increase their skills and professional knowledge.

5.4 Rota/ staffing levels

- In July 2021 an additional RCW post was created in each of the homes for looked after children, to address some of the challenges in terms of rota cover and managers having to cover shortfalls on the rota. The business case to support this reflected the higher cost of paying staff overtime, using agency staff and the impact on the managers capacity to undertake their fundamental role. (This excluded the short breaks home BPH).
- A new electronic rota tool has been implemented, which enables the writing of rotas to automatically calculate hours being worked, annual leave and other absences.
- With effect from September 2021, all newly appointed residential employees are not on a fixed rota, with rota's being written 12 weeks in advance to reflect the needs of the service. All existing staff were given the option to change to the new rota system.
- Team meetings and team development days are planned well in advance to ensure full attendance.
- The managers across the homes work collaboratively together, meeting twice a week to support each other with solutions to rota challenges. As staff are on city wide contracts, when needed they can support and cover shortfalls in other homes.
- Consideration is given to the skill mix of staff within each home and at times staff have moved to another home to enable this to be strengthened when needed.
- Managers provide an on-call rota, with 2 managers available to staff outside of 'office hours' at all times for advice and support and in exceptional circumstances are able to come into the home to deal with significant incidents.
- Relief staff posts are continuously being recruited to and following a 'call to arms', professionals from across children's services also work within our homes.

Challenges:
Due to the complexity of meeting the needs of some children and managing potential risks associated to these, unplanned absences often continue to be covered by overtime and managers as staffing levels cannot drop below 3 to a shift or waking night duties are required to be covered.

Some staff have remained on the fixed rolling rota, each home experiences a different level of flexibility to meet the needs of the service. Consideration has to be given to the skills and experience of staff on every shift and the inability to change some staff's rotas can make this difficult to achieve.

With high levels of new staff being recruited, ensuring each home has sufficiently experienced staff, who can offer mentoring and coaching within a team cannot always be achieved.

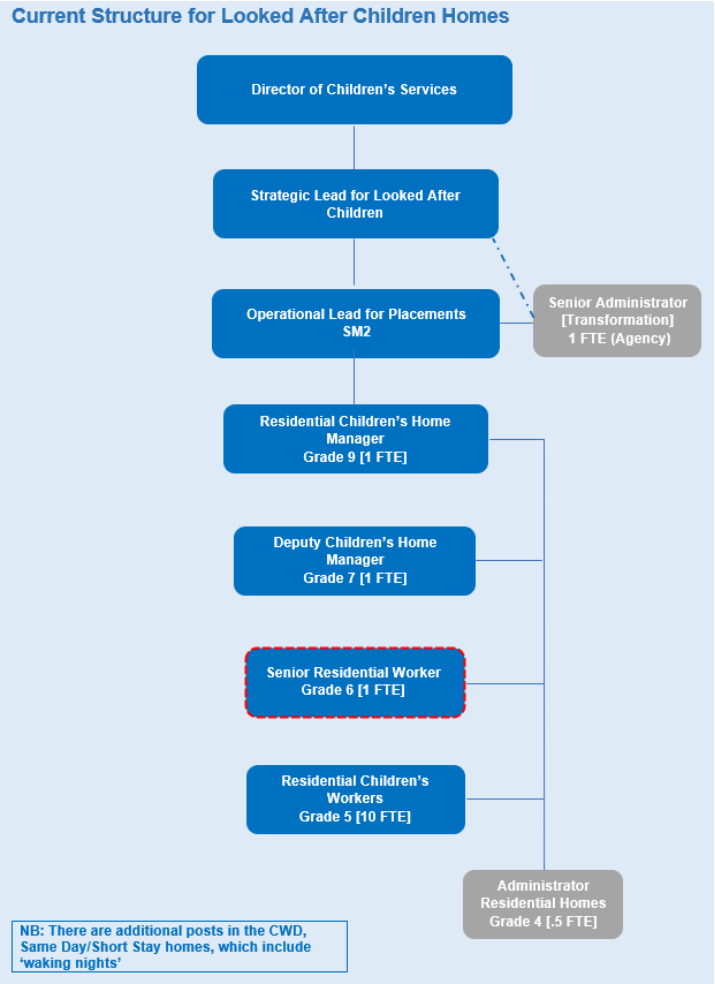
Long term absences and vacant posts, require staff to be flexible and cover from relief staff.

If managers from a home are 'absent' long term, cover and support to meet the demands of these roles in not sustainable, with additional demands being placed on the Operational Lead for Residential and Strategic lead for looked after children.

5.5 Career development pathway.

A role specific induction program is in place, along with residential homes policies and procedures, as needed to meet the requirements of the Children's Homes Regulations (2015). Each home has their own SharePoint site that enables staff to access these at any time.

As the majority of staff who join the service are inexperienced, a high level of support and on the job training is needed. Staff are expected to undertake daily shift reviews to reflect upon practice, what worked well and any learning to embed a culture of continuous improvement and development.



Deputies are supported to undertake the level 5 in leadership and management, alongside accessing leadership and management opportunities offered through the Council.

All staff are required to complete the NVQ 3/4 Diploma in working with children within residential care within 2 years of commencing work in a children's home. Staff commence their diploma, following the completion of their probation period, via the apprenticeship levy.

However, it was noted that there were challenges in retaining staff once this was completed and supporting them to take the next step to become a deputy manager as the demands of the roles were significantly different and opportunities to progress limited. Recognising that there was a need to invest and grow our workforce, agreement was reached to introduce the role of a senior residential worker into the homes.

At the time this agreement was reached, an expression of interest was also submitted to the DfE to be part of the national Staying Close project. As a result of the successful bid, the senior role was expedited into each of the 4 homes for looked after children, with a clear focus on the additional responsibilities and opportunities attached to the post.

The seniors came into post in November 2022 and are bedding into their new roles. This enables them to undertake new learning and some management tasks, thereby strengthening the leadership and management in each home. Seniors will be supported to undertake the 'Stepping into Management' training when next available via the Council and the Level 5 in leadership and management in the future.

A recent review of the Job description for Residential Managers has enabled a regrade of the role to Grade 9, following job evaluation. This reflects the increasing demands and expectations, alongside the individual requirements of the Childrens Homes Regulations (2015) that must be met by a Registered Manager.

<u>Challenges:</u>

As noted above, the recruitment, training and development of staff requires investment in terms of time and resources, to enable an effective career development pathway.

Managers need to be leaders and empower staff to gain the skills, experience, and knowledge to take increasing accountability and responsibility for meeting the needs of the children in their care and the day to day running of the homes.

There is increasing competition in the region for experienced residential staff, as other local authorities start to open new homes and therefore our 'offer' to the workforce needs to exceed other's and make Coventry's Residential Children's Homes and Coventry City Council the preferred employer.

6. Quality Assurance

Although the homes are inspected by Ofsted, at least once per year and monthly by an independent Regulation 44 visitor, the most important source of feedback and learning comes from the children that are cared for in the homes. (Feedback from children is quoted throughout this section).

"I do like living here - you are my family"

"I like the staff here as they are funny and familyish"

"Always checking if we're ok. Help me when I'm not being safe and talk about my feelings"

Regulation 45 requires manages to undertake a review of services at least every 6 months and submit a report to reflect this to Ofsted. The regulation also states that managers:

must establish and maintain a system for monitoring, reviewing and evaluating—

- ***a) the quality of care provided for children;***
- ***b) the feedback and opinions of children about the children's home, its facilities and the quality of care they receive in it; and***
- **c)** ***any actions that the registered person considers necessary in order to improve or maintain the quality of care provided for children.***

Managers, undertake monthly audits relating to a broad range of aspects required for residential care. These vary from ensuring fire alarms have been tested through to the review and approval of child related records such as the Individual Placement Plan (IPP). There is a significant level of oversight of records and practice within a children's home.

"Funny, loving, and I want to stay here"

Monthly independent visitors undertake a 'mini' inspection, submitting a report which identifies strengths, areas for development or actions that are needed to address shortfall in meeting regulatory requirements. Managers provided a written response to these reports and take actions to address areas where needed.

Copies of these reports are submitted to Ofsted, the Responsible Individual [RI] and Coventry's Commissioning Team. The outcomes from each home's individual reports, are collated into a central tracker, which is reviewed quarterly in the residential managers' meetings. Consideration is given to any themes or trends across the homes and service wide solutions are sought and actioned.

"The home supports me in putting my views across"

Ofsted undertake a full inspection annually, during the inspection cycle that runs from April to March. A full inspection is undertaken over 2 days. Inspectors review evidence within the home/LCS and seek feedback from families and professionals, alongside spending time talking to children and staff and observing practice. Information provided from regulation 44 & 45 reports, regulation 40 notifications, annual Ofsted feedback survey outcomes and complaints can influence the focus of the inspection and the outcome.

"You know you're going to adopt me right. I'm not moving anywhere"

The Social Care Common Inspection Framework (SCIF): children's Homes, identifies the evaluation criteria and further guidance[6].

[6] https://www.gov.uk/government/publications/social-care-common-inspection-framework-sccif-childrens-homes/social-care-common-inspection-framework-sccif-childrens-homes

The implementation of the 'When Ofsted Calls' guidance and proformas, has improved the Council wide response and support to inspections, ensuring social workers/ IRO's and other professionals make themselves available to engage in the inspection process.

"I am just lucky that I have had 3 years here with you guys and I am going to miss you when I leave - seriously. I love this house and the people, but I am ready to leave now and do adult stuff. I've got my LifeLong links and I know I will still see you in my future, so that's ok"

The experience of and outcomes following Ofsted inspections has varied across the homes. When shortfalls in practice and care have been identified, robust actions have been taken to address these. When homes have identified requirements or recommendations following an inspection, an action plan is required to be implemented and then submitted to Ofsted. Failure to meet any of the requirements, can lead to a down grade in judgement or the issuing of a compliance notice at an inspection.

"I like that I get time with staff, I'm allowed my phone, I get to go on activities and have got nice things. Its quite a chilled out alright atmosphere and some of the staff have got humour and bants"

The evidence of practice recording has required a complete new set of recording tools to be designed and implemented. Support from the LCS team has been invaluable, allowing forms and recording tools to be designed and amended as we gather learning in the recording evidence needed to reflect practice. Managers lead with the development of these records, with feedback from staff which allows them to be continuously improved. Evidence of direct work is uploaded to children's records, along with feedback forms and photos.

"The staff talk to me and give me information that reassures me, I feel safe"

Having one space for recording, shared with social workers and other professionals within children's services has significantly improved information sharing, enabling up to date information to be accessed by all. It has streamlined the evidence previously required to held as a 'paper copy' within homes and ensures the most up to date information is available. Historically, each home had their own recording tools which created inconsistencies and challenges when staff worked across the homes.

Each home now has a designated LCS file which will allow all Ofsted inspection reports, regulation 44 & 45 reports and copies of required statutory certificates to be stored in one place.

"My relationship with staff has improved a lot and I have amazing relationships with most of them. When they go on holiday or on days off, I really miss them. I fear they might not come back"

A residential children's dashboard is under development which will strengthen and enhance current QA process relating to children's records, performance and support the completion of the regulation 45 reports.

Managers are expected to also contribute to the wider children services QA audits which include observations of direct work and supervision and practice audits.

"The staff here are amazing they help us kids out and they take us on amazing trips. We went to great Yarmouth and had lots of fun pranking 😊"

The Operational lead for Placements undertakes themed dip sampling, following the outcomes of inspections to identify if developments are needed service wide or specific to an individual home.

The Commissioning Team undertake regular 'QA provider' reviews within the homes, offering feedback on areas for development which is shared with the managers, RI and the Quality Assurance team.

Managers meet monthly to continuously review and improve the practice within our homes, identifying training needs, responses to workforce challenges and as a supportive and reflective space. Actions are identified and reviewed at the next meeting.

Feedback is sought by managers, Ofsted and Regulation 44 visitor. This includes professionals and parents.

Examples of positive feedback include:

Parent
"Very happy with service and staff are really good with C and she is very happy living there."

Parent
"No Nothing to improve you do a fantastic job with L."

Social Worker
"There is strong communication between myself and the home. It's recognised that the home has worked hard to form links with families which has resulted in barriers being removed, this is a benefit to the children."

Social Worker
"Parents who visited recently, were very impressed and excited by the setting."

Social Worker
"The home always takes a proactive approach in supporting the children and making sure they communicate with all professionals. They excel in a child focus way and advocating for the children. Management and staff communicate well with the allocated social worker. The whole staffing team have an amazing understanding of each communication and are really good at working together with all services including health, education and social care to reach the best for the children and family".

Lifelong links worker
"Since CCC changed how their in-house homes are run and used. The home is a fantastic flagship, operational, example for good practice. It is truly young person focused with the right helping of love, boundaries, opportunities, and expectations, and for staff and visitors too!"

Coventry Music Service
"The home is a warm, clean and well-maintained environment that continues to support the young people in addition to working effectively with me as an external professional."

Therapeutic Social Worker
"I have found all the staff at Grayswood very professional and good at communicating with school in terms of supporting the child within school….. they are really good at sharing information and working together and have a good understanding of the child's needs."

Through Care
"The young person is encouraged and empowered to reach her best potential which I have observed during my visits."

LifeLong Links worker
"I have seen constructive, caring, and loving relationships, from staff. It is evident that the young people feel valued and cared for."

Professional
"I feel that staff are doing a great job and thank you for all that you do as you continue to support young people to make positive changes in their lives."

Social Worker
"advocate positively on behalf of the young person and provide a therapeutic approach"

Social Worker
"Thank you to all the staff for your love and care of A."

Ofsted inspector
"Staff contribute towards her achieving independence skills by teaching her how to budget and use public transport. Another child has made significant progress at school. He enjoys a range of weekly activities which boost his confidence and self-esteem. He recently received a reward for passing his exams and commented, 'I'm proud of myself."

Ofsted inspector
"Staff know what to do if they are worried about a child. The manager and staff help to protect the children from harm. Staff have a well-coordinated approach to risk assessments. They work closely with other agencies, including the police, to address any identified risks to the children's welfare."

Ofsted inspector
"Staff carry out focused work with children to help them to understand risk and how to do things differently to make themselves safer."

Challenges:
To maintain service delivery Managers may be required to cover unplanned absences, which can result in the timely completion of quality assurance tasks.
Children's homes are inspected and regulations require evidence of quality assurance processes against a number of the quality standards. Competing demands can lead to challenges in the completion of additional QA tasks required by the Quality Assurance team.

The transition to electronic recording has required a high-level of support and training. The embedding of LCS recording into the workforces' daily practice has been challenging and managers continue to support staff to improve this.

The experience of Ofsted inspections and their outcomes have varied over the last 3 years. On occasions Ofsted identified that records do not always reflect the positive practice undertaken with children which has impacted the Ofsted judgement. Failure to record detailed, accurate information has resulted in some homes receiving a number of requirements and recommendations to be actioned by the managers.

7. Long Term Strategy

To address many of the challenges relating to finding the right home at the right time for children in care and reduce the financial burdens on the council, we propose to increase the number of children's homes run by Coventry City Council.

Work is already underway for 2 further homes as described in section 4 of this strategy, with a strong business case and evidence that currently identifies and supports further homes are needed.

Summary of evidence to support strategy:

Although there remain some challenges in providing 'outstanding care' in Coventry City Council's run children's homes, significant improvements and progress has been evidenced. Children are achieving good

outcomes, enabled to remain living close to their families, communities and maintain their education. Some children have been enabled to return home and others have moved successfully towards independence.

Despite the increase in homes following the residential redesign, there is evidence to support that there is a continued demand for children needing residential care and further homes could meet the needs of more children within the city, if they were available. The number of children, living within a children's home has risen over the last 5 years, peaking at 88 in the spring of 2021 with 74 children living in a children's home at March 2023. Although our overall aim is to enable children to remain living with their families wherever possible, there will be a continued need for children to live within a children's home, who have complex and diverse needs, having experienced childhood trauma.

Sufficiency in the placements market is falling short of meeting the demand and high-cost external residential spot placements are responsible for a significant proportion of the annual expenditure in children's services..

There were 74 children in residential Childrens homes at the end of 2022/23, this is 10.1% of the total number of our children looked after.

The current established homes are well regarded by professionals, with evidence of a multi-agency wrap around response to meet individual's needs. Our relationships with partners have been strengthened, with additional support being specifically offered from CAMHS, community police and restorative police officers, partners across health including RISE and the crisis support team. Enabling children to remain living in their city, creates the development of a network of ongoing support as they transition towards adulthood, which is further enhanced by our Staying Close offer.

There is strong political support from the Lead Member for Children in relation to the children's homes and by the wider Council in relation to its corporate parenting responsibilities and investing in the One Coventry approach. The opening of new homes has already increased job opportunities for the residents of Coventry and taken action to support vulnerable children from within the city to remain living in the city.

A child being placed within one of Coventry's homes is a preferred choice of social workers and partners and for many of the children living in them. Having more homes will improve the effective matching of children alongside each other and thereby is likely to increase the occupancy and support placement stability.

Despite there being central government support to improve the quality of residential childcare and to invest in the workforce to achieve this, few additional funding opportunities have been provided. When opportunities have been offered to enhance the residential services, Coventry City Council have seized them and bid for additional funding, successfully securing the £1.6m of grant funding discussed in section 4 of this document.

A national residential workforce census will be undertaken in 2023 & 2024 and the Strategic Lead for Looked after children (corporate parenting) is working with the DfE on this, representing both Coventry & the ADCS. It is hoped that the outcomes of the census will identify the need to create new opportunities for training, development, and investments by central government across the children's residential workforce. All staff have been on and continue to be on a journey of improvement.

The Council is under ever-increasing budgetary pressure for the delivery of services. This extends to the provision of homes for children looked after, meeting a range of needs including children who have mental health and emotional wellbeing needs, learning and physical disabilities, and emotional and behavioral difficulties.

The development of a residential strategy that will expand our internal homes, regaining some control over market mix and the homes on offer to our children, directed towards the emerging needs of the children within our care, will deliver cost avoidance and financial saving to the Council as well as improving outcomes.

8. Proposal

In addition to the two homes underway, as described in section 4 of this strategy, the consideration is to open an additional further 3 homes with up to 4 children living in each:

- 1 further home for children with a disability (home 2) and
- 2 further homes, defined by Ofsted as being for children with emotional and behavioural difficulties

The detail surrounding these additional homes is set out below.

These following proposals would enable up to 36 looked after children to be cared for in a Council run children's homes, alongside the 28 children and families that receive support through the short breaks residential home at Broad Park House. Not only is this of a financial benefit to the Council in reference to market mix and unit costs, but it also ensures improved outcomes for more children.

8.1 Children with Disabilities (CWD) Home Project 2

As of the 31st of March 2023, there are 14 children looked after with a disability, currently living outside of Coventry in external residential children's homes. This figure has remained relatively consistent over the last 3 years with 13 children having been identified as needing this type of home in March 2020.

As well as the enormous benefit to being able to rehome these children in Council owned facilities within the City, there is also an enormous financial efficiency to be gained from bringing this provision back 'in-house'.

External placements for children with a disability are extremely costly. At quarter 3 of 2022-23 the average cost per child, per week was £7,605

The home currently underway will provide 4 places. This strategy is proposing the design and build of a second home that will provide an additional 4 beds taking our internal provision for children looked after with a disability to 8 within the city.

The project team are currently looking for opportunities for a second site that would be suitable. The intention at this stage would be to use the existing design for CWD Home 1.

CWD Home 2 currently has no funding available, however, the project team will endeavour to continue to source funding for this project. The financial assumptions at this moment in time are that CWD Home 2 will cost a similar cost to current the build project, with a small reduction based upon our ability to use the current architects plans to build a new property.

If grant funding does not become available, the whole cost will need to be met from capital borrowing and the financial model within this strategy paper assumes the entire project cost will be funded from borrowing.

Capital Assumptions

- The current business case estimates a total project cost for a 4-bed facility.
- This estimate is based on the following assumptions:
    - The build uses the detailed designs from CWD Home Project 1, therefore enabling a saving in professional fees
    - In the absence of Council land, external land is purchased
    - Build cost inflation assumed at 6.8%

Revenue Assumptions

Current assumptions are the full value of the project will be financed from capital borrowing over a 30-year period, with repayments and all operational costs funded by existing revenue budgets within the service, replacing current external placements expenditure.

Despite the increase in projected costs to complete the build and the requirement to include higher financing repayments within the revenue operating costs, this new home is projecting a saving .

These commercial returns are subject to a range of factors, including occupancy (assumed at 92%), staffing and OFSTED requirements, as well as reflective analysis and learning from preceding projects such as CWD Home 1.

These saving will not be realised until the home has been open and occupied for a full year. Year 1 will incur additional costs during the implementation period where the home is staffed, and OFSTED registered before children can be placed here as an alternate to external homes.

8.2 Homes for children with Emotional and Behavioural Difficulties (EBD)

External placements for children with emotional and behavioural difficulties are extremely costly.

As discussed above, the current lack of sufficiency in the external market and the rapidly increasing costs for placement with external providers support the need to increase our internal portfolio for children's homes that can support young people needing these placements.

The proposal is to introduce two additional EBD homes to our internal homes portfolio over the next 3 years.

At this moment in time, it is not determined whether these will be existing properties that are purchased and made suitable through refurbishment, or whether these will be 'new build' opportunities. This decision will be driven by the availability and cost of suitable premises on the market. The project team would like the flexibility to make this decision based on best value and business case outcomes at the appropriate time.

Capital Assumptions

- The business case assumes the total capital cost of each additional EBD home added to the portfolio includes the purchase price of any land, property, professional fees and where appropriate, refurbishment costs.
- The business case assumes each home to be a 6-bed facility (4 bedroom for young people, and 2 for care home staff).
- No grant funding has been secured at the time of writing this strategy, so for the purposes of this paper it is assumed all project costs will be funded by capital borrowing.

Revenue Assumptions

Current assumptions are the full value of the project will be financed from capital borrowing over a 30-year period, with repayments and all operational costs funded by existing revenue budgets within the service, replacing current external placements expenditure.

The introduction of this provision is projecting a saving based upon the current average cost of an external placement. In addition to the improved outcomes for looked after children highlighted above, this also supports the One Coventry Plan, in terms of tackling inequalities, and increasing the economic prosperity of the city and region, by creating additional job and career opportunities.

These commercial returns are subject to a range of factors, including occupancy (assumed at 87.5%), staffing and OFSTED requirements, as well as reflective analysis and learning from preceding projects.

These saving will not be realised until the home has been open and occupied for a full year. Year 1 will incur additional costs during the implementation period where the home is staffed, and OFSTED registered before children can be placed here as an alternate to external homes. Therefore, it is projected that the first full year of savings will be recognised in year 2 of the project following implementation.

8.3 Improvement of Short Breaks Home with Children with Disability

Further consent is also sought within this proposal in relation to the re-location of Broad Park House (BPH) to a new, purpose built, carbon neutral home. Broad Park House offers critical support to children with a learning disability and complex needs and their families. Without this support, families would struggle which could result in the need for some children to become looked after or enter hospital and children would miss out on invaluable opportunities, that are available to their peers.

The exterior of Broad Park House reflects the era in which it was built. The empty building next to the home was previously offices and there is a metal spiked fence around the property. There are challenges as to how this empty building could be used, given its co-location to the children's home and therefore currently remains empty at a cost to the council. Consideration was given to refurbishing the empty half of the building in 2021 to become a children's home, however the estimated cost at the time deemed it not financially viable, given a new build at that time was approximately the same. Due to the layout of the building, there would also have been challenges in creating a homely environment and the external view of the home would remain looking institutional.

There is a need to continue to support children to gain increasing self-care and independence skills as they age towards adulthood. Although staff work effectively with children around this, the capacity to expand this opportunity is limited due to the design and layout of the building. Building upon the need to provide children with positive transitions to adulthood and to enhance the Continuing Care offer[7], the opportunity for a young person to experience a level of independence, is currently not available

Utilising the design model for the new homes for looked after children with a disability, creates the flexibility for young people to experience a level of independence based upon their individual ability and need.
The offer of care to children would not be disrupted, as Broad Park House would not relocate to the new home until it had been registered with Ofsted.

Consultation will need to be undertaken with families regarding a proposed move. As the home is an established part of the community with strong links to local resources, we would aspire to relocate close to the existing home. A full detailed project initiation document will be completed if agreement is received to ensure a positive and smooth transition for the children and staff to new premises.

There are no direct cost savings linked to this project, although the vacating of the home on Logan Road, will enable the Council to sell the full plot of land. However, the opportunity to enhance the support we offer to children and their families, will improve outcomes, and may decrease costs in the long-term to Adult Services & the NHS.

DfE (2022) *'Where children need specialist residential or therapeutic care, this should be provided as close to where they come from as possible'.*

There is no direct financial saving to be made from these improvements. Running costs would remain the same as they are now, albeit we would expect a new build to be in line with the Councils Green Agenda and

[7] Coventry Childcare procedures online: Preparing for Adulthood – supporting children to transition, People Directorate Protocol https://coventrychildcare.proceduresonline.com/files/pre_adulthood_supp_ch_transit.pdf

be superior to the current property regarding energy efficiency, and there would be the added expenditure of repayment of any capital financing.

A high-level business case has been provided below to understand the additional cost of financial borrowing for these improvements.

The preference of the leadership team at this moment in time is to build a purpose-built facility for these disabled children, and the business case is based on the costs estimated to achieve that goal.

If this facility was relocated to another building, there is the potential that sale proceeds of BPH could provide the project with a capital receipt to reduce the reliance on borrowing. However, this is unknown, and for the purpose of the business case the value of this capital receipt is estimated at £200,000.

Capital Assumption

The current business case estimates a total project cost for a 5-bed facility.

- This estimate is based on the following assumptions:
    - All staff and running costs remain constant
    - Based on relocating the service to a newly built property (the most expensive option)
    - Build uses the detailed designs from CWD Home Project 1, therefore enabling a in professional fees
    - Council land not available, land being purchased set at agreed threshold.
    - Inflation in build costs @ 6.8%
    - Capital receipt received for the sale of BPH

Revenue Assumptions

Current assumptions are the full value of the project (less assumed capital receipts) will be financed from capital borrowing over a 30-year period. All operational costs will be funded by existing revenue budgets within the service, replacing current operating costs, however the additional cost to repay capital financing will need to be met from the overarching savings of this wider strategy, attributed to the other homes within this proposal.

8.4 Additional resource implications

The challenges already identified in section 5 of this document will continue to be addressed and the expansion of the Council's residential portfolio will require additional investment to provide care for up to 20 additional children and support to an additional 75+ staff.

Neighbouring local authorities are beginning to invest in opening new homes, as many rely completely on the private market and commissioning residential placements. This is likely to impact the workforce, with increased opportunities in the region for experienced residential staff, therefore becoming the preferred employer of staff, offering high support and high challenge must be achieved.

The opening of new homes requires a high level of resources, not only from Children's Services, but also across the wider council. During the residential redesign additional support was received from the Transformation Team, with oversight by the Transformation Board. There were challenges for the Operational Lead to oversee the opening of new homes, alongside the modernisation of the residential services, while also managing the Placement Team.

In January 2021, additional support was put in place, allowing the Operational Lead to focus on the residential services, alongside an additional senior professional support officer to support with service wide improvements. To deliver this new strategy effectively and given the expansion of regulatory services, this arrangement will need to be made permanent with ongoing funding for the Operational Lead and the Senior Professional Officer included in the infrastructure costs of this strategy.

The financial benefits from opening a new home take several months to achieve as staff must be in post prior to registration being received by Ofsted. Children move in over a period of months, to allow each child to settle within the home and establish attachments with the staff caring for them. In addition, the creation of a new team to care for children in each home requires high levels of training and support, along with team building opportunities. With the proposed plan to open an additional 5 homes over the next 3 years, there will be a high level of demand on resources, with limited current capacity to successfully achieve this.

Therefore, in addition to the capital financial investment to open new homes identified above, there is an additional need to strengthen the infrastructure of support to successfully achieve this and ensure continuous improvements.

Increase in additional service wide resources :

a) Formal agreement for the Operational Lead for Residential and senior professional support officer to be made permanent, to reflect the significant increase in service delivery and staff support needed to open the new homes.

b) Immediate creation of a Service manager post, who will:
   - Lead on the ongoing recruitment of all posts and those needed for the two approved new homes, based upon their phased opening dates.
   - Support the Operational Lead in the project management and co-ordination of opening the new homes.
   - Oversee and implement the workforce and training strategy: directly offering training and engaging in 'train the trainer' opportunities to broaden the scope of training that is available for all staff to enhance restorative practice and trauma informed/ 'therapeutic' care. E.g., DDP, PACE, Pillars of Parenting, pending the recruitment and appointment of the Development Officer.
   - Identify costs associated with commissioned training to inform a service wide training budget, where specialist training cannot be sourced/ provided through other means. Submit a business case for an ongoing training budget.
   - Undertake additional quality assurance tasks to inform improvements in practice.
   - Induct new registered managers into the residential services and support them in applying to Ofsted for their registration.
   - Provide additional management support across the homes for unplanned absences of a manager.
   - Supervise, coach and mentor the new managers on an ongoing basis and ensure the embedding of good practice, polices, procedures, Signs of Safety and relationship-based practice in the 'Coventry way'.

c) An additional service manager be appointed in approximately 12 months, to support the opening of the additional 3 additional homes in this proposal.
   - The supervision and day to day support to managers within all the homes, will be transferred to the service managers, with the Operational Lead remaining in the statutory role of Responsible Individual (RI) and undertaking supervision of both. Each service manager will have a lead area, being Quality assurance & workforce development and lead for practice improvements.
   - The service managers will split the responsibility of the oversight of the homes 6:4. The 6:4 split is based upon the additional complexity and support that is needed in relation to the oversight and management of the short stay/ same day provision. In the absence of the manager, the service

manager will support the deputy to ensure a robust response to children and their families, who may be in crisis remains effective.

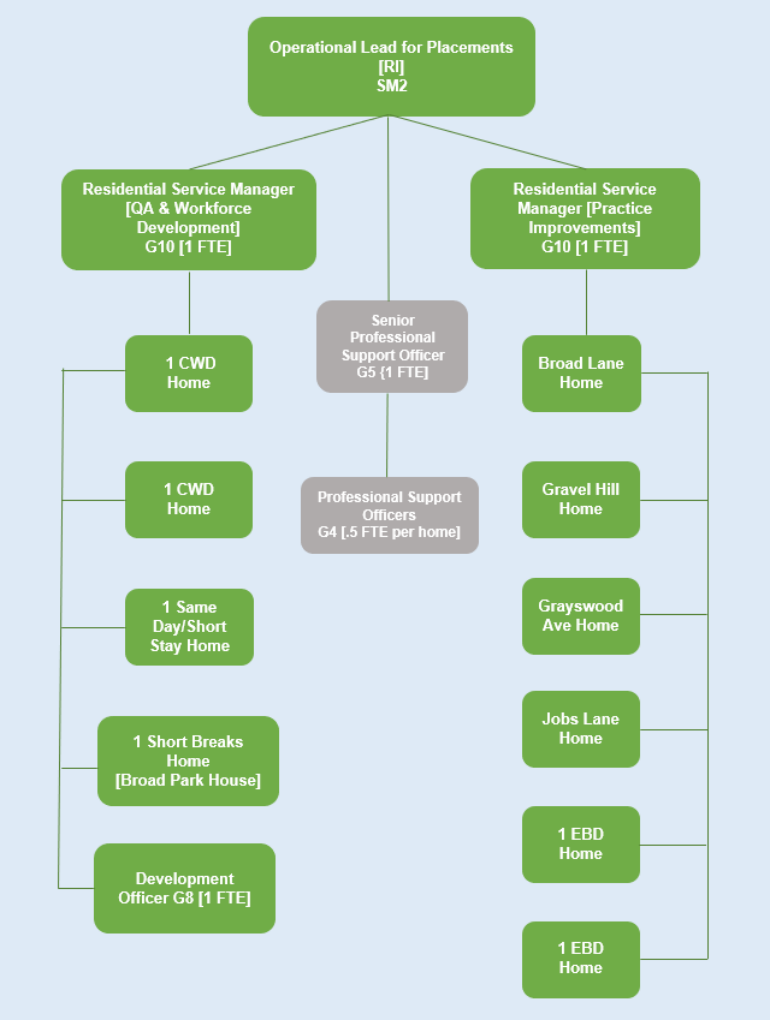
- Contingency planning to cover unplanned absences of managers is critical, to ensure practice and performance remains robust and that the Childrens Homes Regulations (2015) can be adhered to and therefore the additional service manager roles can effectively support this, if needed.

The Costs of all the infrastructure posts have been calculated into the budget for the overarching proposal for the new homes:

It will take a minimum of 3 months to recruit to new posts from point of approval, with the aspiration for the first service manager to be in post in the summer of 2023.

With the additional capacity for quality assurance and improvements, training and development, alongside a strong career pathway, our homes will provide the best care possible, with evidence provided to Ofsted to judge them as 'outstanding' children's homes.

The diagram below shows the intended management structure of the roles within the Internal Residential service



9. Financial implications

In summary, if all projects reach completion and achieve the expected savings, the full year impact on the service will be savings compared to the cost of current provision.

In addition to the potential savings identified above, there is also a commercial benefit to the Council of adding additional properties to its portfolio of assets.

9.2 Preferred timeline assumed in 5-year cost projections:

The preferred timeline for these proposals is set out below, which impact on the annual budget requirements of this strategy. However, it must be noted that the actual plan for bringing new homes into the programme with be influenced by continued assessment of service priorities and needs analysis as well as grant funding opportunities to support capital borrowing pressures, the impact of the property market availability and prices within the city.

Home	Planned Start Date	Planned Project Duration	Planned Completion Date
Children with disabilities (CWD) Home 2	August 2023	22 months	June 2025
Emotional and Behavioural Difficulties (EBD) 1	April 2024	8 months	December 2024
Emotional and Behavioural Difficulties (EBD) 2	August 2025	8 months	April 2026
Short Breaks Home with CWD	October 2024	24 months	October 2026

9.3 Impact on Medium term financial strategy (MTFS)

Within the budget setting process for 2023/24, Children's Services identified the development of an Internal Residential Strategy to commit savings towards the Corporate MTFS in future years.

The prioritisation of these projects has shifted from this 2023/24 budget setting estimate due to DfE grant opportunities and exploration of the external property market. It is also possible to include more detail regarding investment costs and short-term budget pressures attributed to implementation periods when opening a new home.

There is an updated 5-year financial plan surrounding this strategy and compares this to the figures included within the MTFS.

This will be kept under continuous review by the Project Board and will be subject to change if any of the projects change their prioritisation in the timeline or incur any slippage.

By the end of 2027/2028 financial year, this strategy proposes an overall annual saving which increases the existing commitment to the MTFS, assuming all timelines and business case financials remain as proposed within this paper.

However, 2023/24 sees an additional revenue investment requirement due to implementation costs incurred by the homes during the first year of opening, plus initial infrastructure costs.

2024/25 sees savings realised by the Short Stay home, however these are offset by the implementation costs of both the CWD 1 home and the EBD 1 Home.

2025/26 realises savings across all three of these homes (Short Stay, CWD1 & EBD1) and recognises the initial costs of CWD 2.

9.4 Financial Risks, Assumptions and Sensitivities

Summary of financial assumptions and sensitivities.

- **Interest rates on capital borrowing.** The financial model assumes that capital borrowing will remain at an interest rate of 4.5% for the entire project. If the interest rate increases by 1%, then the finance costs will increase by £1,000 per year for each £100k of borrowing.

- **Capital spend.** The cost of purchasing or building properties is based on recent data on property prices and build cost. Where properties will be built or purchased in the future, there has been some allowance made for future price increases. However, the true cost will depend on the rate of price inflation over the project length.

- **Occupancy levels.** The future occupancy level of the internal homes is estimated at between 75% and 92.0%, the actual figure depends on the type of internal home. This is in line with occupancy levels achieved across CCC's existing internal residential homes. The occupancy rates can have a significant impact on savings,
- **Internal residential mix.** Once all internal homes are open, the maximum internal occupancy for looked after children will be 36. However, the true occupancy will always be lower than this due to voids and the nature of the short-term residential home, which is included within the assumptions set out in the business case for each home.

  Based on residential numbers as at the end of March 2023, this would give a mix of residential provision as follows:

  This is from a total number of children looked after (excluding UASC) at the end of March 2023 of 659.

Residential type	Beds
Internal homes	36
Block beds	11
Framework/spot	24
	71

  Acknowledging the aspirational target of, no more than 10% of total looked after population within residential care, consideration needs to be given at each stage of the strategy to the level of market risk being absorbed internally held against market sufficiency pressure.

  As it stands our aspiration would be to reduce numbers in residential care down to 65 (10% of total). The provision of 36 beds internally as well as 11 beds within the external block provider contract, means we are committing to 47 beds (72% of projected residential requirement) These places are at risk of delivering a financial impact if we hold vacancies and voids.

  There is also the consideration that internally we will be providing 55% of our aspirational residential cohort. (50% of the current residential usage). This provides other risk factors to consider, such as the staffing risks expanded in the following point.

- **Staffing risk and resilience.** The residential workforce is a fundamental part of the strategy and is necessary to deliver a high-quality internal home provision. As staffing costs are the largest revenue expense of the project, the cost of delivery can be impacted significantly by high levels of absences. In these circumstances other internal home staff need to cover the rota and earn overtime. To account for this, an element of rota cover has been built into the model in line with CCC's other internal homes. In addition, training and development budgets have been provided to each home to help support their staff.

- **Opening dates.** In section 9.2 of the residential strategy there are timelines and estimated opening dates for the internal homes. This informs the project cashflow and the impact on the medium-term financial strategy (section 9.3). There are many external factors that can impact the delivery of the residential strategy including time taken to identify appropriate properties or land, the conveyancing

process, legal and planning issues, Ofsted registration and recruitment of residential workers. Any changes to the timelines will impact the project cashflow and savings timings. The impacts may be positive if home openings are accelerated or negative if there are delays.

- **Grant opportunities.** CCC has already been successful in securing grants of £1.6m that will help support the residential strategy as outlined in section 4.3. There is still a possibility that further grant opportunities will arise over the course of the residential strategy. If CCC successful bids and is awarded further grants that supports this, they may positively impact on the cost of delivering the strategy and increase savings.

10. Strategy Governance

A project of this scale and complexity requires clear project governance that aligns to the Councils corporate policies and processes.

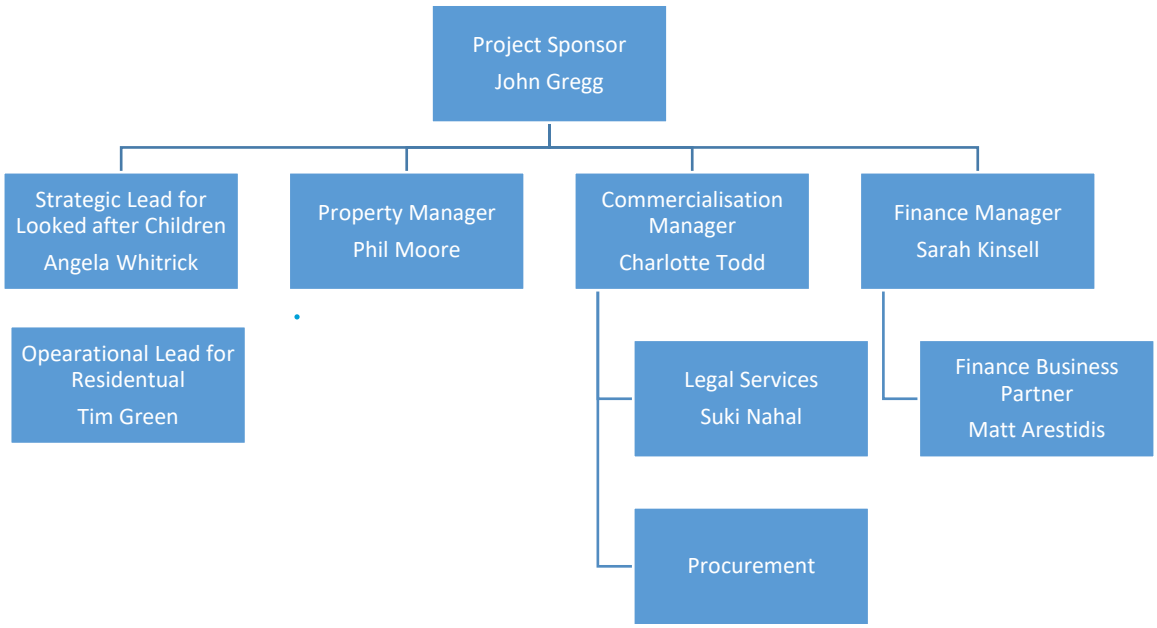
10.1 Project Sponsor & Leadership

The Project shall be owned and sponsored by the Children's Services directorate, with the Director of Children's Services as Project Sponsor.

The Project Sponsors shall be responsible for ensuring appropriate engagement with the political stakeholders, and to promote the Project through the political governance processes. There will be regular reports on progress to the Lead member for Children's Services and Corporate Parenting Board.

The Project will require input from colleagues in the property, commercial, procurement, finance and legal departments.

10.2 Project Structure



10.3 Project Board

A Project Board shall be formed, with membership as shown in the Project Structure or otherwise agreed by the Project Sponsor. The Board shall meet at least monthly and report to the Project Sponsor when appropriate.

Additional resources may be required as the project progresses, for instance external expertise in legal, financing and project management. The need for additional resources will be agreed by the project board.

10.4 Decision Delegation

This paper sets out the maximum financial liability in respect of the strategy proposed that will deliver outcomes as described in this paper. The project team acknowledge the need to be agile in terms of decisions that will need to be made during the progression of the strategy and its project and the manner in which funds are spent to achieve objects. For example, decisions will need to be made relating to the best use of money when considering the cost of a new build property versus purchasing a property on the open market and refurbishing to ensure the home provides the children with fit for purpose, nurturing environment.

Therefore, this paper requests that the allocated funds pursuant to the proposals set out in this paper are delegated to suitable officers.

Delegated authority is to be given to the Chief Operating Officer (S151 Officer) and the Director of Children's Services, following consultation with the Cabinet Member for Children and Young People, to finalise and agree the detailed business case and project outcomes. The authority under this delegation shall also include the power to enter into the necessary legal agreements and subsequently the power to negotiate and agree any such variations as is deemed necessary to the terms of the loan facility and ancillary documents.

EQUALITY IMPACT ASSESSMENT (EIA)

Coventry City Council

Title of EIA		Residential Childrens Homes Strategy
EIA Author	Name	Tim Green
	Position	Operational lead for Residential.
	Date of completion	9.6.23
Head of Service	Name	Angela Whitrick
	Position	Strategic Lead for Looked after Children (Corporate Parenting)
Cabinet Member	Name	Cllr Seaman
	Portfolio	Lead Cabinet Member for Children and Young people

EIA
- Having identified an EIA is required, ensure that the EIA form is completed as early as possible.
- Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities), Lisa Young (Health Inequalities).

Sign Off
- Brief the relevant Head of Service/Director/Elected Member for sign off
- Have the EIA Form ready for consultation if it is required
- Amend according to consultation feedback and brief decision makers of any changes

Action
- Implement project / changes or finalise policy/strategy/contract
- Monitor equalities impact and mitigations as evidence of duty of care

PLEASE REFER TO EIA GUIDANCE FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

☒New policy / strategy
☒New service
☐Review of policy / strategy
☐Review of service
☐Commissioning

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☐Other project *(please give details)*

1.2 In summary, what is the background to this EIA?

In line with our sufficiency duty, it has been identified that Coventry is in need of additional residential provision for both disabled, looked after children and those looked after children who have been identified as having emotional behavioural difficulties. It is hoped that this will reduce the number of children and young people that are placed out of city due to a lack of available provision within the city. This will mean less disruption to the child/young person in terms of access to Education, health and other services and enable them to be close to family, friends and their local community. There are also significant financial benefits to be made by using internal placements as opposed to external ones.

1.3 Who are the main stakeholders involved? Who will be affected?

These services will benefit disabled looked after children aged 10 to 18, and looked after children who have been identified as having emotional and behavioural, difficulties, aged between 10 and 18.
The opening of new homes will also create additional jobs within the city.

1.4 Who will be responsible for implementing the findings of this EIA?

Angela Whitrick - strategic lead for looked after children and Tim Green – operational lead for childrens residential services.

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

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Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to https://www.coventry.gov.uk/factsaboutcoventry

The additional home for looked after children with disabilities will be purpose built and therefore will allow the four residents to experience living in a fully accessible environment. The environment will enable them rather than disable them, giving them maximum independence. Because the home will be accessible, it will give the children living there more opportunities to have similar experiences to their non-disabled peers.
Establishing a home for disabled children in a community environment will allow the children to become part of that community and will allow the community to have positive interactions with disabled children and young people which will enable them to make a positive contribution. This will help to dispel any myths or prejudices about disabled people.

The two homes for looked after children who have been identified as having emotional, behavioural difficulties, will provide four children, in each home, the opportunity to live as a 'family' within a community location as their non- looked after peers do. This can again give them the opportunity to make a positive contribution to their community and help to integrate them with their peers.

Children who are looked after by their very nature are disadvantaged. Being able to stay within the city they and their family come from eliminates a further disadvantage. Being placed out of Coventry city, would mean living in potentially an unfamiliar environment away from important family members and friends. Evidence tells us that being placed at distance from family, can cause not only emotional distress for both the child and their family but can also become a barrier to family time.

The Governments Children's Social Care Market Study report, 22/3/22 says;

First, and most importantly, it is clear that the placements market, particularly in England and Wales, is failing to provide sufficient supply of the right type so that looked-after children can consistently access placements that properly meet their needs, when and where they require them. This means that some children are being placed in settings that are not appropriate for their own circumstances, for instance where they are:

- *far from where they would call 'home' without a clear child protection reason for this, thereby separated from positive friend and family networks: 37% of children in England in residential placements are placed at least 20 miles from their home base*

The Independent Review of Children's Social Care, May 2022, quoted care experienced young people as follows;

"It is scary going to new places and moving away. Its new schools and new faces so kids often run away to something familiar."

"*I think people assume that children are getting their basic needs, it's enough. Like you know they've got food and shelter... OK, they're better off than where they used to be, and you as a child you do have that mindset you're like, oh, I'm better than where I used to be, so it's OK, but those basic needs aren't necessarily enough."*

Coventry City Council

All three of the proposed new homes will help to address these issues.

The majority of looked after children have additional needs which require interventions from support services such as education, health and social care. This can be particularly prevalent amongst disabled children who often need a large amount of additional support services. Moving children out of city can often mean that there is a hiatus in them receiving crucial support whilst new services are found.
Aa significant number of looked after children have autism spectrum disorder and nearly all have attachment issues. Both of these conditions mean that any change in those caring for them will have a significant impact on those looked after children. Having continuity of care and support is of the upmost importance and this would be possible if children are placed within the city.

Coventry is a very ethnically and culturally diverse city which has well established community groups, places of worship and services which meet ethic and cultural needs within the city. Placing children with ethnic and cultural needs in placements which are not as well served as Coventry with provisions that address these needs, put them at a disadvantage.

In addition, for those children that remain in our care until they transition to adulthood, will have established support networks and meaningful relationships with carers who live close by, providing them with 'Staying Close' opportunties.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

Protected Characteristic	**Impact type** P, N, PN, NI	**Nature of impact and any mitigations required**
Age 0-18	**P**	Looked after children aged 10 –18, who have been identified as having emotional, behavioural difficulties, will be able to live in Coventry near to their families, friends and communities and received continuity of care and services.

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Age 19-64	**P**	Through the work of the Staying Close Project, care leavers will receive continuity of care and support from the same carers who looked after them until the age of 18. This supports a better transition into adult services. Additional jobs will be created within the city, recruiting carers that reflect the diversity of the children we care for and in the communities they live in.
Age 65+	**NI**	
Disability	**P**	Looked after disabled children will have the opportunity to reside in coventry close to family, friends, communities and support services. This ensures a continuity of care and support.
Gender reassignment	**P**	Thise who wish to go through, or are going through gender reassignment, will be fully supported to do so. Remaining in Coventry city may reduce any disruption to services that can support with gender reassignment.
Marriage and Civil Partnership	**NI**	
Pregnancy and maternity	**NI**	
Race (Including: colour, nationality, citizenship ethnic or national origins)	**P**	Children from ethically, racially and culturally diverse backgrounds will be able to stay connected to their families, friends and communities and will be able to continue to access places of worship, groups and support services.
Religion and belief	**P**	Children are supported to practice the religion of their choice if they wish to do so. Carers support children to explore belief systems and understand the advantages and disadvantages to these.
Sex	**P**	Homes are of mixed gender and children will be supported in relation to gender identity.
Sexual orientation	**P**	Carers support children to explore their sexual orientation if they wish to do so and they are supported in whatever choices they make in this respect.

HEALTH INEQUALITIES

2.3	Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.

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	Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities **Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.** **If you need assistance in completing this section please contact: Alicia Philips or Lisa Young in Public Health for more information. More details and worked examples can be found at** https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx

Question	Issues to consider
2.3a What HIs exist in relation to your work / plan / strategy	• Explore existing data sources on the distribution of health across different population groups *(examples of where to find data to be included in support materials)* • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	Response: Many looked after children have suffered poverty, neglect, physical abuse, emotional abuse, sexual abuse, domestic violence and substance misuse. Nearly all looked after children have attachment issues. Due to these issues, looked after children often have developmental delay, ADHD, ASD, ODD, poor mental and emotional wellbeing, low self -esteem and can be prone to self-harm. Many looked after children self- medicate through the use of alcohol and drugs and a large number of them smoke and vape. Children who live in poverty can suffer malnutrition and poor dental hygiene. Thise who suffer neglect can miss crucial childhood immunisations, malnutrition, poor dental hygiene, poor personal hygiene, recurrent headlice, recurrent infections, missed developmental and physical health checks. Children who suffer physical abuse can have unhealed or badly healed bone fractures and breaks, and psychological problems such as PTSD. Children who suffer sexual abuse can suffer enuresis and encopresis as well as psychological issues. Children who have suffered emotional abuse and have witnessed domestic violence and parental substance misuse will often have psychological issues and behavioural problems. All exposure

	to toxic stress in babies and children causes brain development to be affected negatively. Disabled looked after children can experience all of the above in addition to underlying medical and neurological developmental conditions.
2.3b How might your work affect HI (positively or negatively). How might your work address the needs of different groups that share protected characteristics	**Consider and answer below:** • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income • Consider what the unintended consequences of your work might be
	Response: a. Potential outcomes including impact based on socio-economic status or geographical deprivation The children our provisions are intended for will most likely come from areas of deprivation within the city and poor socio-economic households, as we know from research that the numbers of looked after children is disproportionately high from deprived areas and poor backgrounds and that these factors do contribute towards family breakdowns. Equally, the numbers of disabled children from these areas and backgrounds are also disproportionately high. Our proposed services will impact these children and their families positively. They will be able to live safely in near proximity to their families, friends and communities. This will enable continuity of services, regular family time, no disruption to education, CAMHS, health, voluntary and short breaks interventions. Being placed locally may also allow for additional interventions, such as, family therapy, to take place. It would also support the work of the reunification team, Lif long Links team and the Staying Close project.

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b. Potential outcomes impact on specific socially excluded or vulnerable groups e.g. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

Looked after children are a very vulnerable group. They are often at a significant disadvantage to their peers in all areas of life. Due to their life experiences, they can often present very challenging and anti-social behaviours. Part of the work we do with them is to help them to recognise and explore their behaviour and to understand the negative impact it has on others. We aim to give them strategies that they can use to modify their behaviour, making it less challenging and anti-social, thus making them less marginalised and more accepted.
We can also offer care leavers support from the Staying Close project. There will be a staying close project worker in each of the homes, who will ensure that when our children transition into independent living and adult services, that they have the right support and enough support.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

A thorough needs assessment of each child is completed on admission to a home. Areas of need are separated into consultation needs, enjoyment and achievement needs, positive relationships needs, safety needs, education needs and health needs. We use Signs of Safety as our analysis and ensure that any goals and next steps are actioned in a timely manner. these assessments are live documents that are reviewed as a minimum each month and reflect the current needs of the child.
We work closely with health services including, GP's, Paediatricians, LAC nurses, and CAMHS, and additional specialist services such as the smoking cessation team and Positive Choices.

DIGITAL INCLUSION

2.5	The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English (NHS Digital.)

Coventry City Council

Some of the barriers to digital inclusion can include lack of:

- **Access** to a device and/or data
- **Digital skills**
- **Motivation** to get online
- **Trust** of online safety

Digital exclusion is not a fixed entity and may look different to different people at different times.

Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.

Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.

Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.

It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.

Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.

If you need assistance in completing this section please contact: Laura Waller (*Digital Services & Inclusion Lead, CCC*). More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx

Question	Issues to consider
2.5 What digital inequalities exist in relation to your work / plan / strategy?	• Does your work assume service users have digital access and skills? • Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? • Consider what the unintended consequences of your work might be.
	Response: There is no assumption made about children's access to digital skills and devices. Where appropriate children are given a phone and a monthly top up allowance. We will tutor them in IT skills if needed and we will also complete online safety

	work with them. All the homes have Wi-Fi access and we will ensure that all children have access to a laptop.
2.5b How will you mitigate against digital inequalities?	• If any digital inequalities are identified, how can you reduce these? For e.g., if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.
	Response: N/A

2.6 How will you monitor and evaluate the effect of this work?

Our work is extensively scrutinised and monitored in the following ways;
Regulation 44 visits once a month by an independent person who produces a Regulation 44 report which is then sent to Ofsted.
Ofsted inspections, at least once a year that are unannounced. We are inspected and judged against the SCIFF and the Children's Homes Quality Standards.
Internal QA by Children's commissioning
Internal QA by Managers – Monthly
Oversight of practice and performance by the Operational Lead for Residential, Strategic Lead for looked after children (corporate parenting) who is also the Responsible Individual to the childrens homes.
Via Corporate Parenting Board and as appropriate Scrutiny Board 2.

2.7 Will there be any potential impacts on Council staff from protected groups?

Although, the home for disabled children may be fully accessibile, the other two homes may not be suitable for wheelchair users.
Addtional posts/jobs will be created, reflecting a key priorities of the Council in relation to:

1. Increasing the economic prosperity of the city and region
2. Improving outcomes and tackling inequalities within our communities

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex: **Age:**

Female	

Coventry City Council

Male	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups ☐

Positive impact has been identified for one or more protected groups ☒

Negative impact has been identified for one or more protected groups ☐

Both positive and negative impact has been identified for one or more protected groups ☐

4.0 Approval

Signed: Head of Service:	**Date: 8 June 2023**

Name of Director: **John Gregg**	**Date sent to Director: 12 June 2023**
Name of Lead Elected Member: **Cllr Seaman.**	**Date sent to Councillor: 12 June 2023**

Email completed EIA to equality@coventry.gov.uk

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of the Local Government Act 1972.

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