



Coventry City Council

Council Meeting

13th September 2011

Booklet 1

Recommendations

INDEX TO MINUTES

**Cabinet Member (Policy, Leadership and Governance),
7th July 2011**

Audit Committee, 20th July 2011

Cabinet, 30th August 2011

CABINET MEMBER (POLICY, LEADERSHIP AND GOVERNANCE)

7th July, 2011

Cabinet Member

Present:- Councillor J Mutton

Shadow Cabinet

Member Present:- Councillor Mrs Dixon

Employees Present:-

H. Abraham (Customer and Workforce Services Directorate)
H. Peacocke (Customer and Workforce Services Directorate)
M. Rose (Customer and Workforce Services Directorate)

Public Business

1. Declarations of Interest

There were no declarations of interest.

2. Minutes

The minutes of the meeting held on 24th February, 2011 were agreed as a true record. There were no matters arising.

3. Coventry City Council Code of Corporate Governance 2011-1014

The Cabinet Member considered a report of the Director of Customer and Workforce Services which sought approval of the revised Coventry City Council's Code of Corporate Governance which was appended to the report. The Code contained the six principles of good corporate governance and details of how Coventry City Council were meeting the principles. The Code provided a broad ethical framework for the Council and was last approved by the Council in March, 2009 (minute 120/08 refers). The revised Code had previously been considered by the Constitution Working Group on 15th June, 2011 and was due to be considered by Council on 13th September, 2011.

The report noted that the Council were responsible for ensuring that business was conducted in accordance with the law and proper standards and that public money was safeguarded and appropriately accounted for; used in an economical, efficient and effective manner. The Council were duty bound under the Local Government Act 1999 to make arrangements to secure continuous improvement in a way which functions were exercised and having regard to a permutation of economy efficiency and effectiveness. In discharging this overall responsibility the Council were responsible for putting in place proper arrangements for the governance of its affairs, including arrangements for the management of risks.

It was good practice for councils to have a Code of Corporate Governance that would lead to quality management, excellent performance and good stewardship of public money. Good governance enabled the authority to pursue its vision effectively as well as underpinning that vision with systems for management control. The Code was a public document which set out the way the Council meets its commitments to

demonstrating that it had the necessary corporate governance arrangements in place to perform successfully. Best practice was set out in the 2007 publication by CIPFA/SOLACE (CIPFA Chartered Institute of Public Finance and Accountancy and SOLACE Society of Local Authority Chief Executives) 'Delivering Good Governance in Local Government'. The Council first approved and adopted its Code of Corporate Governance in March 2009. The adopted Code was consistent with the principles of the CIPFA/SOLACE framework. When the Code was adopted, the intention was to review it in 2011.

The Code had now been reviewed and updated, to reflect changes that had taken place since its publication in 2009. The draft Code of Corporate Governance was considered by relevant officers including officers in Finance, Legal, Performance and Scrutiny and Corporate Policy in order to update the Code as part of the review, as well as members of the Constitution Working Group. The review of the Code did not identify any areas of non compliance. A recommendation from the Cabinet Member would be considered by Council. The recommended option for approval was that the Code be approved.

The Code of Corporate Governance followed the six principles which councils were advised to test their governance structure against. Councils should review their existing arrangements against these, develop and maintain the Code of Corporate Governance and prepare an Annual Governance Statement. These principles were:

- A clear definition of the body's purpose and desired outcomes
- Well defined functions and responsibilities
- An appropriate corporate culture
- Transparent decision making
- A strong governance team
- Real accountability to stakeholders

The Council followed these principles and these were recorded in the Annual Governance Statement, which would be published alongside the Council's accounts for future years. The Annual Governance Statement was approved by the Audit Committee each year.

The Code of Corporate Governance would be kept up to date, and it would be reviewed by the Council's Constitution Working Group. It had been proposed to update this document every three years going forward. Future revised Codes would be submitted to Cabinet Member for approval.

There was a further discussion about publishing the Code. It was reported that this would take place after the Council meeting.

Resolved that, after due consideration of the report and the matters referred to at the meeting the Cabinet Member (Policy, Leadership and Governance) recommends that Council approve the revised three year Code of Corporate Governance 2011-2014 appended to the report.

Cabinet Member (Policy, Leadership and Governance)
Council

7th July 2011
13th September 2011

Name of Cabinet Member:

Cabinet Member (Policy, Leadership and Governance) – Councillor John Mutton

Director Approving Submission of the report:

Director of Customer and Workforce Services

Ward(s) affected:

N/A

Title:

Coventry City Council Code of Corporate Governance 2011-2014

Is this a key decision?

No

Executive Summary:

The Code of Corporate Governance sets a broad ethical framework for the Council and was last approved by the Council in March 2009. The Code has now been updated. The updated Code was considered by the Constitutional Working Group on 15th June 2011.

The purpose of the report is to seek approval from the Cabinet Member of the revised Coventry City Council's Code of Corporate Governance, as set out in Appendix 1.

Recommendations:

The Cabinet Member is recommended to:

- (1) Consider the revised three year Code of Corporate Governance 2011 – 2014 at Appendix 1 and provide any comments to Council together with a recommendation to approve the Code;

Council is recommended to:

- (1) Consider any comments from the Cabinet Member (Policy, Leadership and Governance) and approve the Code of Corporate Governance 2011 – 2014 attached at Appendix 1 of this report.

List of Appendices included:

Code of Corporate Governance 2011-2014.

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?

No

Will this report go to Council?

Yes

13th September 2011

Report title: Coventry City Council's Code of Corporate Governance 2011-2014

1. Context

- 1.1 The Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards and that public money is safeguarded and appropriately accounted for; used in an economical, efficient and effective manner. The Council is duty bound under the Local Government Act 1999 to make arrangements to secure continuous improvement in a way which functions are exercised and having regard to a permutation of economy efficiency and effectiveness. In discharging this overall responsibility the Council is responsible for putting in place proper arrangements for the governance of its affairs, including arrangements for the management of risks.
- 1.2 It is a good practice for councils to have a Code of Corporate Governance that leads to quality management, excellent performance and good stewardship of public money. Good governance enables the authority to pursue its vision effectively as well as underpinning that vision with systems for management control.
- 1.3 The Code is a public document which sets out the way the Council meets its commitments to demonstrating that it has the necessary corporate governance arrangements in place to perform successfully. Best practice is set out in the 2007 publication by CIPFA/SOLACE 'Delivering Good Governance in Local Government'. The Council first approved and adopted its Code of Corporate Governance in March 2009. The adopted Code is consistent with the principles of the CIPFA/SOLACE framework. When the Code was adopted, the intention was to review it in 2011.

2. Options considered and recommended

- 2.1 The existing Code of Corporate Governance was due to be reviewed in 2011. The Code has now been reviewed and updated, to reflect changes that have taken place since its publication in 2009. The updated Code of Corporate Governance is set out in Appendix 1. This was considered by the Constitution Working Group on 15th June 2011 and now needs a recommendation from the Cabinet Member to Council that the Code be approved.
- 2.2 The Code of Corporate Governance follows the six principles which councils are advised to test their governance structure against. Councils should review their existing arrangements against these, develop and maintain the Code of Corporate Governance and prepare an Annual Governance Statement. These principles are:
 - A clear definition of the body's purpose and desired outcomes
 - Well defined functions and responsibilities
 - An appropriate corporate culture
 - Transparent decision making
 - A strong governance team
 - Real accountability to stakeholders
- 2.3 The Council has followed these principles and these are recorded in the Annual Governance Statement, which will be published alongside the Council's accounts for future years. The Annual Governance Statement is approved by the Audit Committee each year.

- 2.4 The Code of Corporate Governance will be kept up to date, and it will be reviewed by the Council's Constitution Working Group. It has been proposed to update this document every three years going forward. Future revised Codes will be submitted to this Cabinet Member for approval.

3. Results of consultation undertaken

- 3.1 The draft Code of Corporate Governance was considered by members of the Constitution Working Group at their meeting of 15 June 2011. Relevant officers including officers in Finance, Legal, Performance and Scrutiny and Corporate Policy were consulted about updating the Code as part of the review.
- 3.2 It should be noted that the review of the Code did not identify any areas of non compliance.

4. Timetable for implementing this decision

- 4.1 Subject to approval, it is expected that the Code of Corporate Governance will be submitted to full Council for adoption. The Code will be published immediately following its approval.

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

There are no additional funding requirements resulting from the recommendations in this report.

5.2 Legal implications

There is no statutory requirement for this Code to be produced. However it follows CIPFA/SOLACE 'Delivering Good Governance in Local Government' guidance.

6. Other implications

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

The adoption of the revised Code will continue to provide the structure for discharging accountability for the proper conduct of public business through the Annual Governance Statement that should make the adopted practice more open and overt.

6.2 How is risk being managed?

This review demonstrates that the Code of Corporate Governance is operating effectively and therefore minimises any risk from a failure of corporate governance.

6.3 What is the impact on the organisation?

The failure to have in a place a sound system of corporate governance would represent a significant risk to the Council.

6.4 Equalities / EIA

The operation of the Code Corporate Governance will support the Council in its achievement of Equalities objectives.

6.5 Implications for (or impact on) the environment

None

6.6 Implications for partner organisations?

None

Report author(s):

Name and job title:

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Enquiries should be directed to either of the above.

Contributor/approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Helen Abraham	Assistant Director (Democratic Services)	Customer and Workforce Services	17/6/11	17/6/11
Other members				
Names of approvers for submission: (officers and members)				
Neil Chamberlain	Finance Manager, Central Services	Finance and Legal Services	22/6/11	22/6/11
Christine Forde	Council Solicitor & Monitoring Officer	Finance and Legal Services	22/6/11	24/6/11
Bev Messinger	Director of Customer and Workforce Services	Customer and Workforce Services	22/6/11	27/6/11
Cllr Mutton	Leader		22/6/11	22/6/11

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Appendix 1



COVENTRY CITY COUNCIL

CODE OF CORPORATE GOVERNANCE

2011-2014

CODE OF CORPORATE GOVERNANCE

Governance is about organisations ensuring that they are doing the right things in the correct manner for the right people in a timely, open, honest, inclusive and accountable manner.

It follows that good governance leads to good management, performance, public engagement, stewardship of public money and, through all this, good outcomes for citizens and service users. Good governance also enables the Council to pursue its vision effectively as well as reinforcing that vision with the mechanisms for control and management of risk.

Coventry City Council has put a lot of effort into ensuring that its arrangements for governance are robust and meet good practice. This Code of Corporate Governance brings all of its practices together in one document, making them open and explicit.

John Mutton

Councillor John Mutton
Leader of the Council

Martin Reeves

Martin Reeves
Chief Executive

Introduction

All of the decisions made by Coventry City Council about what services it delivers and how to deliver them are supported by a whole set of systems and processes which make up the Council's 'governance arrangements'. These include holding meetings where decisions are made, the Council's legal framework, setting out priorities and roles clearly, holding decision makers to account through scrutiny, risk management processes, financial monitoring and ensuring high standards of conduct.

Local authorities are being encouraged to demonstrate how they ensure effective governance arrangements by setting these out in a local code of governance.

Coventry City Council established its 'Code of Corporate Governance' in 2009. The Code is based on the 2007 guidance "Delivering Good Governance in Local Government". From CIPFA (the Chartered Institute of Public Finance and Accountancy) and SOLACE (the Society of Local Authority Chief Executives).

The Council has adopted this Code of Corporate Governance to give citizens and customers a clear understanding of how the Council manages its decision making, service planning, service delivery and accountability processes, how it ensures that the Council sets out its vision and priorities, and how it provides effective and efficient outcomes to its citizens and customers.

This document contains:

1: The six principles of good corporate governance

2: How Coventry City Council meets the principles of good corporate governance

1: The principles of good corporate governance

The national guidance on 'Delivering Good Governance in Local Government' (CIPFA/SOLACE, 2007) suggests that there are six principles of good governance for local authorities. This Code of Corporate Governance for Coventry City Council adopts these principles, which are set out below. Section 2 outlines how the City Council meets the requirements of each principle.

Principle 1:

Focusing on the purpose of the Council and on outcomes for the community and creating and implementing a vision for the local area.

Principle 2:

Members and officers working together to achieve a common purpose with clearly defined functions and roles.

Principle 3:

Promoting values for the Council and demonstrating the values of good governance through upholding high standards of conduct and behaviour.

Principle 4:

Making informed and transparent decisions which are subject to effective scrutiny and managing risk.

Principle 5:

Developing the capacity and capability of members and officers to be effective.

Principle 6:

Engaging with local people and other stakeholders to ensure robust public accountability.

The Code of Corporate Governance was first published in March 2009. It was considered by the Constitution Working Group before being approved by the Council's Standards Committee and by Council. This revised 2011 Code has been considered by the Council's Constitution Working Group and then approved by the Cabinet Member for Policy, Leadership and Governance. Going forward, the Code will be reviewed every three years.

The Council will demonstrate how the policies and procedures identified within the Code of Corporate Governance are operating effectively within its Annual Governance Statement.

2: How Coventry City Council meets the principles of good corporate governance

This section sets out how Coventry City Council works to the six principles of good corporate governance.

Principle 1: Focusing on the purpose of the Council and on the outcomes for the community and creating and implementing a vision for the local area.

Summary:

The long term vision and outcomes for the City are set out in "*Coventry the next twenty years*" the Coventry Sustainable Community Strategy (SCS) which was adopted by the Council in March 2008 and was produced by The Coventry Partnership, the local Strategic Partnership. The SCS was refreshed in March 2010 and the revised SCS was approved by Cabinet in March 2011. The Coventry Partnership is made up of public, private, community and voluntary sector organisations and includes councillors.

Coventry City Council has a three year Council Plan which sets out the Council's vision and objectives and how the organisation will deliver agreed outcomes and priorities.

The Council sets out its financial strategy for 3 years ahead in its Medium Term Financial Strategy.

Coventry City Council:	Examples of evidence
Develops and promotes its purpose and vision for the local area,	<p>"<i>Coventry the next twenty years</i>" Sustainable Community Strategy Council Plan Local Development Framework And this is promoted through various mechanisms including: Ward Forums <i>Citivision</i> free magazine Coventry Partnership website Coventry City Council website Coventry and Warwickshire Local Enterprise Partnership 2011/16</p>
Reviews its vision regularly and the implications for the Council's governance arrangements	Reviews of the Council Plan
Ensures that partnerships are underpinned by a common vision that is understood and agreed by all partners	<p>"<i>Coventry-the next 20 years</i>" - Sustainable Community Strategy (SCS) Terms of reference for all theme groups of the Coventry Partnership Health and Well-being Board (May 2012)</p>

<p>Publishes an annual report on a timely basis to communicate the Council's activities and achievements, its financial position and performance</p>	<p>Statement of Accounts (including the Annual Governance Statement) Annual Performance Report</p>
<p>Decides how it will measure quality of service for users and makes sure that the information needed to review service quality effectively and regularly is available</p>	<p>Council Plan Customer and residents' surveys Data Quality Policy Equality Strategy – 2011-2014 Divisional Plans Coventry City Council Customer Service Standards Facts about Coventry</p>
<p>Puts in place effective arrangements to identify and deal with failure in service delivery</p>	<p>Coventry Partnership Performance management system Council Complaints Procedure Performance Management Framework</p>
<p>Decides how it will measure value for money, making sure that the Council or partnership has the information needed to review value for money and performance effectively, and measures the environmental impact of policies, plans and decisions.</p>	<p>Medium Term Financial Strategy Transformation Programme and regular performance reports to Cabinet/Scrutiny Council Plan Value for money conclusion by external auditors Cabinet report templates – section 6 implications (including for the environment) Annual review of Council Plan</p>

Principle 2: Members and officers working together to achieve a common purpose with clearly defined functions and roles.

Summary:

Coventry City Council's governing body is made up of 54 elected councillors. The Council has a 10 member Cabinet which forms the Executive body of the Council and makes 'key decisions' on all matters relating to more than one ward or which exceed £500,000 of expenditure. The Council's policy framework, budget and certain key strategies are approved by full Council (made up of all 54 elected members).

Statutory functions such as planning and licensing are carried out by separate statutory committees. In addition, the Council has 5 Scrutiny bodies that contribute to long-term policy development, review and challenge the performance of the Council and hold the Cabinet to account. The Constitution is monitored by the Constitution Working Group which puts forwards recommendations to the full Council for approval.

Coventry City Council:	Examples of evidence:
Sets out a clear statement of the roles and responsibilities of the executive, members and senior officers, and the arrangements for putting this into practice	The Constitution, Part 2, Articles 1-12. Job descriptions
Determines, monitors and updates a scheme of delegation	Constitution: Scheme of Delegation (Part 3) Constitution Working Group agendas and minutes
Includes in the Constitution a schedule of those matters specifically reserved for collective decision of the Full Council, taking account of relevant legislation	The Constitution, Part 2, Article 4: The Council Meeting
Makes the Chief Executive responsible and accountable for all aspects of operational management, and has protocols for a shared understanding of the roles of the Leader and Chief Executive	Job Description and person specification of Chief Executive The Constitution, Part 2, Article 1 - 12
Makes a senior officer (the S151 officer) responsible for providing appropriate advice on all financial matters, for keeping proper financial records and accounts, and for maintaining an effective system of internal financial control	Job description and person specification for the Director of Finance and Legal Services (S151 officer). Constitution, Part 2, Article 11: Employees, and Article 13: Finance, contracts and legal matters

<p>Makes a senior officer (the monitoring officer) responsible for ensuring that agreed procedures are followed and that all applicable statutes and regulations are complied with</p>	<p>Constitution, Part 2, Article 11: Employees, and Article 13: Finance, contracts and legal matters</p> <p>Job description and person specification for the Council Solicitor / Assistant Director, Finance and Legal Services (monitoring officer)</p>
<p>Develops protocols for effective communication between members and officers</p>	<p>Protocol for Member/Employee relations</p> <p>Constitution, Part 5: Code of Conduct for Elected and Co-opted Members</p> <p>Constitution, Part 5: Code of Conduct for Employees</p>
<p>Set out the terms and conditions for remuneration of members and officers and maintain an effective structure for managing the process</p>	<p>Constitution, Part 6: Members' Allowances Scheme</p> <p>Officer terms and conditions of service</p> <p>Independent Remuneration Panel terms of reference</p>
<p>Has effective mechanisms in place to monitor service delivery</p>	<p>Council Complaints Procedure</p> <p>Performance Management Framework</p>
<p>Develops, articulates and disseminates the Council's vision, strategic plans, priorities and targets in consultation with the local community and other key stakeholders</p>	<p>Divisional Plans</p> <p>"Coventry the next twenty years" Sustainable Community Strategy</p> <p>Council Plan</p> <p>Local Development Framework</p> <p><i>And this is promoted through various mechanisms including:</i></p> <p>Ward Forums</p> <p><i>Citivision</i> free magazine</p> <p>Coventry Partnership website</p> <p>Coventry City Council website</p>
<p>Clarifies members roles and responsibilities (individually and collectively) when working in partnership with others</p>	<p>Terms of reference, articles of association or constitutions for work with partnership and outside bodies e.g. The Coventry Partnership,</p> <p>Coventry and Warwickshire LEP - LEP Strategy 2011-2016 and LEP 2011/12 Business Plan</p>
<p>Clarifies the legal status of partnerships as well as the extent of each partner's authority to make decisions within the partnership</p>	<p>Terms of reference, articles of association or constitutions for work in partnerships and outside bodies</p> <p>Coventry and Warwickshire LEP - LEP Strategy 2011-2016 and LEP 2011/12 Business Plan</p>

Principle 3: Promoting values for the Council and demonstrating the values of good governance through upholding high standards of conduct and behaviour.

Summary:

High standards of conduct are expected of members and officers throughout the Council. These standards are articulated in the Council's Member Code of Conduct for elected and Co-opted Members and Code of Conduct for Employees. In addition the Council has core values, which are set out in its Corporate Plan. The standards are promoted in induction and training sessions for both officers and members. The Standards Committee monitors member compliance with the Code of Conduct for Elected and Co-opted Members and investigates most local complaints regarding allegations of misconduct, taking reports and advice from the Council's Monitoring Officer.

Coventry City Council:	Examples of evidence:
Creates a climate of openness, support and respect across the Council	Code of Conduct for Elected and Co-opted Members, Constitution Part 5.1 Code of Conduct for Employees, Constitution Part 5.2 Whistleblowing Policy, within Code of Conduct for Employees, Constitution Part 5.2 Freedom of information policy Anti-Bullying and Dignity at Work Procedure
Develops expected standards of conduct and personal behaviour and communicates these to members, staff, partners and the community	Code of Conduct for Elected and Co-opted Members, Constitution Part 5.1 Code of Conduct for Employees, Constitution Part 5.2 Employee and Members' Induction Training
Puts in place effective arrangements to ensure that members and employees are not influenced by prejudice, bias or conflicts of interest when dealing with different stakeholders and monitors these arrangements	Induction and training for members on member code of conduct Employee corporate induction and training sessions HR policies and procedures These are monitored by: Standards Committee terms of reference Ad-hoc reviews by both Internal and External Audit
Develops shared organisational values that reflect public expectations, and communicates these to members, staff, the community and partners	Council Plan Annual performance report Code of Conduct for Elected and Co-opted Members, Constitution Part 5.1 Code of Conduct for Employees, Constitution Part 5.2 Employee and Members' Induction Training Members' Handbook Council Vision and Values

Coventry City Council:	Examples of evidence:
<p>Designs systems and processes to conform with appropriate ethical standards, and monitors their continuing effectiveness in practice</p>	<p>Articles of the Constitution, Constitution Part 2 Code of Conduct for Elected and Co-opted Members, Constitution Part 5.1 Code of Conduct for Employees, Constitution Part 5.2 Local assessment process for investigating complaints of member misconduct. Standards Committee terms of reference, agendas and minutes</p>
<p>Maintains an effective Standards Committee</p>	<p>Standards Committee terms of reference, agendas and minutes</p>
<p>Uses shared organisational values to support decision making and as a basis to develop positive and trusting relationships within the authority</p>	<p>Code of Conduct for Elected and Co-opted Members, Constitution Part 5.1 Code of Conduct for Employees, Constitution Part 5.2 Corporate Plan 2011 – 2014</p>
<p>Agrees shared values with our partners, which partners can demonstrate in their decision making and their actions</p>	<p>Terms of reference, articles of association or constitutions for working in partnership and outside bodies. For example the Coventry and Warwickshire LEP, Health and Well-Being Board</p>

Principle 4: Making informed and transparent decisions which are subject to effective scrutiny and managing risk.

Summary:

All Council decisions must be made and recorded in an appropriate manner, being robust enough to withstand any potential scrutiny or legal challenge. Coventry City Council has in place a robust and transparent process for making decisions that is articulated in the Council's Constitution. It is supported by the use of rolling Forward Plan containing all key decisions due to be made by the Cabinet in the forthcoming four months, and use of a formal Cabinet report template to aid decision making and ensure consistency.

Decision makers are provided with reports one week in advance of any meeting, which contain sufficient rationale, financial and legal information, options and clear recommendations to enable them to make a considered decision. Scrutiny committees have a valuable role to play in such decisions, considering cabinet business both in advance and (through the call-in process) after Cabinet meetings.

How Coventry City Council:	Examples of evidence:
<p>Maintains an effective scrutiny function which encourages constructive challenge and enhances the performance of both the Council and any organisation for which it is responsible</p>	<p>Constitution, Part 2, Article 6: Scrutiny Part 3.4 "functions of Scrutiny" and Part 4.5 Scrutiny procedure rules</p> <p>Work programmes, agendas and minutes of Scrutiny Co-ordination Committee and boards</p> <p>Annual Scrutiny report to Council</p>
<p>Maintains open and effective mechanisms for documenting decisions as well as the criteria, rationale and considerations on which decisions are based</p>	<p>Forward Plan and Constitution definition of key decisions</p> <p>Standard report template</p> <p>Publication of agendas, reports and minutes on website</p> <p>Constitution, Part 4 Procedure rules for Cabinet, Council, and Scrutiny meetings</p> <p>Webcast facility for meetings of Council</p>
<p>Puts in place effective arrangements to safeguard members and employees against conflicts of interest and monitors that these arrangements are working in practice</p>	<p>Code of Conduct for Elected and Co-opted Members, Constitution Part 5.1</p> <p>Code of Conduct for Employees, Constitution Part 5.2</p> <p>Constitution Part 5, 5.2 ad-hoc reviews by both Internal and External Audit</p> <p>Standards Committee terms of reference, agendas and minutes</p>
<p>Maintains an effective Audit Committee independent of the executive and scrutiny functions</p>	<p>Audit Committee. This produces an Annual Report</p> <p>Annual Review of the effectiveness of the Internal Audit</p>

How Coventry City Council:	Examples of evidence:
<p>Provides those making decisions (whether for the Council or in partnership) with information that is fit for the purpose - relevant, timely and gives clear explanations of technical issues and their implications</p>	<p>Report template contains background, options and recommendations, timescales, implications for finance, legal and other aspects. Reports go through quality assurance checks</p> <p>Reports published one week before meetings</p> <p>Performance Reports – Strategic needs assessments</p> <p>Officer training courses - 'Reporting to Cabinet and other committees' and 'Working in a political environment'</p>
<p>Makes available proper professional advice on matters that have legal or financial implications well in advance of decision making and monitor that this advice is used appropriately</p>	<p>Forward Plan of key decisions due in next four months published monthly</p> <p>Cabinet, Council and other committee reports include 'financial implications' and 'legal implications', cleared with departments</p> <p>Reports published one week before decision making. Advice available during meeting discussion</p>
<p>Embeds risk management into the culture of the Council, recognising that effective risk management is part of everyone's job, including members and officers</p>	<p>Risk Management Strategy</p> <p>Ad-hoc reviews by both Internal and External Audit</p> <p>Audit Committee Terms of Reference, agenda and minutes</p> <p>A risk implication section is incorporated into the standard report template to ensure these are considered for every decision</p>
<p>Puts in place effective whistle-blowing arrangements that are accessible to members, staff and all those contracting with or appointed by the Council</p>	<p>Constitution Part 5, 5.2</p> <p>Audit Committee Terms of Reference, agenda and minutes</p>
<p>Works within the limits of lawful activity whilst using our powers to the full benefit of the community</p>	<p>Constitution</p> <p>Forward Plan of key decisions due in next four months published monthly</p> <p>Cabinet, Council and other committee reports include 'financial implications' and 'legal implications', cleared with departments</p> <p>Reports published one week before decision making. Advice available during meeting discussion</p>
<p>Observes both the specific requirements of legislation and the general responsibilities placed on the Council</p>	<p>Constitution</p> <p>Forward Plan of key decisions due in next four months published monthly</p> <p>Cabinet, Council and other committee reports include 'financial implications' and 'legal implications', cleared with departments</p> <p>Reports published one week before decision making. Advice available during meeting discussion</p>

How Coventry City Council:	Examples of evidence:
<p>Integrates the key principles of good administrative law - rationality, legality and natural justice – into procedures and decision making processes</p>	<p>Legal Services provide legal advice on the content of reports presented to appropriate committee/council meetings and lawyers attending those meetings.</p> <p>Monitoring Officer provides various legal advice including scope of powers and authority to make decisions.</p> <p>Constitution</p>

Principle 5: Developing the capacity and capability of members and officers to be effective

Summary:

The Council is committed to developing officers and members to enable them to carry out their roles effectively. Officer development is carried out within the Council's People Management Strategy, and supported by the Performance, Development and Review annual process for all employees.

For members, the Council has achieved Member Development Charter status and carries out an annual programme of Member training and development. An induction programme for new members is ran each year and every member is offered the option of drawing up a Personal Development Plan, using the six core political skills to identify potential areas for learning and development. The Personal Development Plans drive the direction of the Member training and development programme. Within the Member Support Framework, the Council has adopted the six core political skills for members to define the types of development needed to carry out all their roles effectively. All members have access to secretarial support and certain members who have special responsibilities have access to additional Personal Assistance support. Recently, in order to improve the support to members, support has been centralised, this is with the aim to provide standardised and consistent support to all elected members.

Political groups also conduct their own one to one support and hold group activities such as facilitated group meetings or away days. Buddying and mentoring support is provided by members inside and outside of the Council, especially those new to the Council or taking on a new role.

Coventry City Council:	Examples of evidence:
<p>Tailors induction programmes to individual needs and provide opportunities for members and officers to update their knowledge on a regular basis</p>	<p>Member induction and training programmes Member Personal Development Plans Briefings and workshops delivered to all members or political groups Employee induction process + Directorate and Corporate Induction Employee Annual Performance, Development and Review process, including the new Competency Based Appraisals Induction and management training Corporate Management Team away days, Directorate Wider Management Team meetings, Monthly <i>Core Brief</i>, <i>Insite</i> staff magazine and Intranet</p>

<p>Provides statutory officers with the skills, resources and support necessary to perform effectively in their roles</p>	<p>Job descriptions and person specifications Performance, Development and Review process. New Competency Based Appraisals</p>
<p>Assesses the skills required by members and officers and develop those skills to enable them to carry out their roles effectively</p>	<p>Job descriptions and person specifications Performance, Development and Review process. New Competency Based Appraisals Induction and management training Member Personal Development Plans.</p>
<p>Continually develops skills to improve performance, including the ability to scrutinise and challenge and use outside expert advice when it is needed</p>	<p>Performance Development Review process. New Competency Based Appraisals Councillor Personal Development Plan process Member training programme. Induction and management training</p>
<p>Puts in place effective arrangements to review the performance of the executive as a whole and of individual members</p>	<p>Constitution, Part 2, Article 6: Scrutiny Scrutiny Committees, scrutiny review groups and call-in process Performance Management Framework Employee Performance Development Review process Member Personal Development Plans</p>
<p>Development improvement action plans to address any training or development needs</p>	<p>Individual Personal Development Plans offered to all councillors</p>
<p>Encourages individuals from all sections of the community to engage with, contribute to and participate in the work of the Council</p>	<p>Ward Forums Coventry Partnership Equalities Strategy 2011 – 2014, Sec 9 Promoting Equality of Opportunity and Improving Equality of Outcomes</p>
<p>Develops career structures for members and officers to encourage participation and development</p>	<p>Training, Learning and Development Strategy. Member Support Framework including development programme. Personal Development Plans for Members Annual Workforce Plan and Profile Employee Annual Performance, Development and Review process.</p>

Principle 6: Engaging with local people and other stakeholders to ensure robust public accountability

Summary:

The Council carries out extensive consultation to seek the views of stakeholders and uses the results to inform service delivery. In 2008/09, the Council developed a formal corporate policy to respond to the new duty to inform, consult and involve which sets out its approach to consultation. In 2010 the Council revised its petition processes to meet legislative requirements, including provision of an epetition facility online in December 2010.

Ward forum meetings are held in each of 18 wards in the City, 4-5 times each year. These are meetings which involve other public sector agencies including the police and health authorities.

Coventry City Council:	Examples of evidence:
<p>Is clear with ourselves, all staff and the community about what the Council is accountable for and to whom</p>	<p>Constitution <i>Coventry the next twenty years</i>" Sustainable Community Strategy Council Plan Local Development Framework And this is promoted through various mechanisms including: Ward Forums <i>Citivision</i> free magazine Coventry Partnership website Coventry City Council website</p>
<p>Develops constructive and effective relationships with our stakeholders and regularly assesses the effectiveness of such arrangements</p>	<p>We regularly review our partnerships including the Coventry Strategic Partnership Constitution working group; officer working group Advisory panels Relationships with West Midlands Local Government Association (WMLGA) and government departments Department of Communities and Local Government / Department of Children, Schools and Families etc. Terms of reference and governance arrangements are available on Coventry Local Strategic Partnership website www.coventrypartnership.com</p>
<p>Produces an annual report on the activity of the scrutiny function</p>	<p>Annual Report of Scrutiny to Council</p>

Coventry City Council:	Examples of evidence:
<p>Maintains clear channels of communication with all sections of the community and other stakeholders, and puts in place monitoring arrangements to confirm that they operate effectively in practice</p>	<p>"Coventry the next twenty years" Sustainable Community Strategy Council Plan Advisory panels Local Public Service Board Budget consultation process Equalities Strategy and Equality Schemes Communications Strategy Local Development Framework Inform, Consult and Involve Strategy And this is promoted through various mechanisms including: Ward Forums Coventry Partnership website Coventry City Council website Website and <i>Citivision</i> magazine Council tax leaflets</p>
<p>Holds meetings in public unless there are good reasons for confidentiality</p>	<p>Council meetings are open to the public except where, for legal reasons, matters are discussed in private as 'Part II' business or are confidential meetings Agendas, reports and minutes published on Council's website</p>
<p>Enables all sections of the community to engage effectively with the Council, recognises that different sections of the community have different priorities and establishes explicit processes for dealing with these competing demands</p>	<p>Local Development Framework Petition Scheme, Constitution, Part 4.9 Customer Services Strategy Equality Strategy 2011 – 2014 ePetition facility on Council's website Equalities Impact Assessments. Community Cohesion Strategy Voluntary sector compact. Scrutiny Review Inform, Consult and Involve Strategy</p>
<p>Develop and publish a clear consultation policy including a feedback mechanism for consultees to demonstrate what has changed as a result</p>	<p>Customer Services Strategy Inform, Consult and Involve Strategy</p>

Coventry City Council:	Examples of evidence:
<p>Publishes annually a performance plan giving information on the Council's vision, strategy, plans and financial statements as well as information about its outcomes, achievements and the satisfaction of service users in the previous period</p>	<p>Annual Performance Report and Statement of Accounts Summary of annual accounts in <i>Citivision</i></p>
<p>Is open and accessible to the community, service users and its staff, operating in a transparent way in all dealings, including partnerships, except in specific circumstances where confidentiality is appropriate</p>	<p>Council Plan 2011 – 2013 Customer Service Strategy Equality Strategy Constitution Meetings held in public. Agendas, reports and minutes published on Council's website Freedom of Information (FOI) policy; FOI training to staff and members</p>
<p>Produces a clear policy on how staff and their representatives are consulted and involved in decision making</p>	<p>Council staff survey Employer - Union forum meetings – quarterly Health and Safety Forum meetings with Union representatives A Trade Union Consultation and Facilities Agreement has been agreed with the Trade Unions, which puts in place a clear hierarchy of consultation meeting processes</p>

AUDIT COMMITTEE

20th July 2011

Audit Committee

Members Present:

Councillor Bains
Councillor Blundell (Deputy Chair)
Councillor Chater (Chair)
Councillor Field
Councillor Sawdon

Employees Present:

P. Baggott (Finance and Legal Services Directorate)
M. Burn (Finance and Legal Services Directorate)
L. Commane (Finance and Legal Services Directorate)
B. Hastie (Finance and Legal Services Directorate)
P. Jennings (Finance and Legal Services Directorate)
L. Knight (Customer and Workforce Services Directorate)
S. Mangan (Finance and Legal Services Directorate)
P. McDermott (Customer and Workforce Services Directorate)
L. Montgomery (Finance and Legal Services Directorate)
C. Steele (Chief Executive's Directorate)

RECOMMENDATIONS

8. Audit Committee Annual Report to Council 2010-11

The Committee considered a report of the Director of Finance and Legal Services which was received in order to comply with the terms of reference for the Audit Committee to report annually to full Council on its work.

During 2010/11, the Audit Committee met formally on seven occasions. Meetings were held in June, July, September, November and December 2010, as well as in February and April 2011. The report gave details of the reports considered by the Audit Committee in 2010/11 which included Accountancy, Internal Audit and Risk Management, and External Audit reports. The Committee had also considered other reports and briefings on Housing Benefit Fraud, Asset Management, Foster Care Payments, Business Continuity, ICT Service, Purchasing Cards, Capital Receipts 2010/11 and Future Forecasting and Data Quality.

The report indicated that the Council had made significant enhancements to its Audit Committee arrangements over the last few years and this was supported through the setting up of a 'stand alone' Audit Committee. However, there were still areas for development for the Audit Committee, which included formalising training arrangements, gaining an independent view as to how well the Committee is performing, and keeping abreast of national development and their potential impact on the operation of the Audit Committee.

In 2011/12, the Audit Committee's initial focus would be on ensuring that effective action is taken in response to areas for improvements highlighted in the Annual Governance Statement 2010/11. From an audit perspective, the following five areas were identified as a result of work carried out by the Council's Internal and External Auditors:-

- (a) Addressing the recommendations highlighted in the Audit Commissions Annual Audit Letter.
- (b) Developing processes to support the implementation across Coventry schools of the proposed new Schools Financial Value Standard.
- (c) Ensuring the effectiveness of arrangements in place to oversee the Council's ICT requirements, post the implementation of the Council's new ICT Service.
- (d) Ensuring that the Council's key financial systems continue to provide adequate safeguards against the risk of fraud, especially in the current economic climate.
- (e) Continue to embed systems covering corporate governance arrangements with the Council, such as declarations of interests and hospitality registers. This will also include gaining assurances that effective arrangements are in place to oversee such activities.

In addition, the Audit Committee would continue to focus on providing challenge and scrutiny of the Council's financial position in 2011/12 and beyond; assessing the quality of work of both Internal and External Audit to ensure that the Council obtains maximum value from its investment in audit work carried out; and ensuring that officers respond promptly to issues highlighted at the Audit Committee meetings. This could range from the implementation of audit recommendations through to responding to budgetary control pressures and, as part of this process, officers will be asked to attend meetings, if appropriate, to justify their actions especially where progress made had failed to match expectations.

RECOMMENDED that the Council consider the Audit Committee Annual Report 2010/11 and note the priorities for 2011/12, as detailed in 1.6 of the report.



Audit Committee Annual Report to Council

2010-11

To be considered at the City Council meeting
on the 13th September, 2011

Audit Committee Annual Report 2010-11

Introduction by Chair of Audit Committee

In May 2010, the Council appointed me as Chair of the Audit Committee. Whilst this role was new to me, I have extensive experience of working on Audit Committees, both within the Council and also within the NHS.

During the past 12 months I've enjoyed the challenge of my role and the wide variety of activity that the Audit Committee considers.

This report provides an overview of Audit Committee activity during the municipal year 2010-11.

I am pleased to report that the Committee has continued to make progress in terms of discharging its responsibilities to provide independent assurance on the adequacy of the Council's risk management framework and the associated control environment, and to provide scrutiny of the Authority's financial performance.

In looking forward to 2011-12 and beyond, the importance of an effective Audit Committee remains critical, given the financial pressures that the Council continue to face.

Over the coming year I will be working closely with both officers and Members to ensure that the Committee both enhances the skills and knowledge available to it, and provides comprehensive scrutiny and challenge in respect of the Council's financial performance.

Furthermore, we will be closely monitoring national developments (for example the Localism Bill, consultation on the future of local public audit) and the potential impact that these may have on the operation of the Council's Audit Committee.



A handwritten signature in black ink that reads "D. Chater". The signature is stylized and written in a cursive-like font.

Councillor Dave Chater
Chair, Audit Committee

1 Activity of the Council's Audit Committee

- 1.1 During 2010-11, the Council's Audit Committee met formally on seven occasions. Meetings were held in June, July, September, November and December 2010, as well as in February and April 2011.

The following sections provide details of the reports considered by the Audit Committee in 2010-11 and the support provided to it.

- 1.2 **Accountancy** – In addition to the Statement of Accounts (including revenue and capital outturn) presented to the Audit Committee in June 2010, progress reports in respect of the Council's performance against its revenue and capital budgets were considered in September and December 2010, as well as in February 2011.

Additionally the following reports / briefings were considered during the year:

- Linked to the Council's financial performance during 2010-11, the Directors of Children, Learning and Young People and City Services and Development were asked to attend the Audit Committee to discuss areas of overspend in their directorates and management actions being taken to mitigate such overspends.
- A briefing note was considered at the December 2010 meeting which outlined the Council's progress against the requirement that the annual accounts for 2010-11, be prepared based on the basis of the International Financial Reporting Standards.

- 1.3 **Internal Audit & Risk Management Service** – As part of the Annual Accounts process, the Service co-ordinated the development of the Council's Annual Governance Statement (AGS) for 2009-10. The Statement was presented to the Audit Committee in June 2010 (with a follow-up report in February 2011). In addition, during the year, the Audit Committee received the following annual reports from the Service at the June and July meetings:

- Internal Audit Annual Report - This report had two main purposes:
 - To summarise the Council's Internal Audit activity for the period April 2009 to March 2010 against the agreed Internal Audit Plan for the same period.
 - To provide the Audit Committee with the Internal Audit and Risk Manager's opinion on the overall adequacy and effectiveness of Coventry City Council's internal control environment. Based on the work of Internal Audit in 2009-10, the Internal Audit and Risk Manager concluded that 'moderate' assurance could be provided that there was generally a sound system of internal control in place during 2009-10 designed to meet the organisation's objectives.

- The annual review of the effectiveness of the system of Internal Audit – This review stemmed from the requirement under the revised Accounts and Audit Regulations that the Council "*at least once a year, conduct a review of the effectiveness of the system of Internal Audit*". The review focused on two areas, namely assessing the performance of the Internal Audit Service during 2009-10 across a variety of internal and external measures, and reviewing progress against the action plan developed to support the assessment of the Council's Audit Committee arrangements made in the light of CIPFA recommended practice.
- Corporate Fraud Annual Report - This report summarised fraud activity for 2009-10 against the agreed Corporate Fraud Plan for the same period.
- Risk Management Annual Report - This report provided a summary of the Council's risk management activity for the financial year 2009-10. Specifically, it documented the outcomes of the reviews of the effectiveness of the Council's risk management arrangements, as well as identifying key priorities for 2010-11.

Other reports considered by the Audit Committee during the year include:

- Quarterly reports on Internal Audit work - Monitoring reports were received in September and December 2010, as well as in February 2011. These reports provided updates on the performance of the Service, along with a summary of the key findings from a sample of high profile audit reviews carried out in the relevant periods.
- Corporate Fraud Update – A half yearly progress report was received in December 2010, summarising fraud activity in 2010-11 and highlighting performance against the Corporate Fraud Plan for the same period.
- Recommendation Tracking Report - In September 2010, a report on action taken by Council Officers in respect of implementing agreed audit recommendations was presented. This highlighted high levels of compliance with the implementation of agreed actions.
- Joint Working Protocol NHS Coventry – Given the expectation that the Council will continue to work closer with other local public sector bodies, including the NHS, a protocol was presented to the Audit Committee in December 2010. The protocol documented the proposed framework to govern the operation of Internal Audit practice at both NHS Coventry and Coventry City Council, as part of joint working arrangements.
- The Internal Audit Plan for 2011-12 - This builds on the Internal Audit Strategy approved in April 2009. The plan continues to focus

resources on a more risk-based approach, with clear links with the Council's Corporate Risk Register and Corporate Plan.

- The Corporate Fraud Plan 2011-12 - This plan is closely linked with the Council's Strategy and Policy in respect of Fraud and Corruption and builds upon the 2010-11 Plan. The focus of the work covers four areas, namely awareness, data matching, proactive fraud and reactive fraud.

1.4 External Audit Reports - The following reports were received from the Audit Commission (the Council's External Auditors) in 2010-11:

- Annual Governance Report - The purpose of this report was to identify amendments in the Statement of Accounts, following the completion of the annual audit by the Audit Commission and to make recommendations for improvements arising from the audit process. The Audit Commission concluded that, pending satisfactory clearance of outstanding matters, an unqualified audit opinion would be provided on the Council's financial statements.
- Value for Money Conclusion – This report stated that the Audit Commission would provide an unqualified value for money conclusion report. This meant that the Council had at least adequate arrangements across the 10 theme areas to secure economy, efficiency and effectiveness in its use of resources.
- Recommendation Tracking Report - This report assessed action taken by the Council in respect of implementing agreed audit recommendations from reviews carried out by the Audit Commission. This highlighted generally high levels of compliance with the implementation of agreed actions, although some slippage in implementing recommendations was identified.
- Annual Audit and Inspection Letter - This was considered at the December 2010 meeting. The main focus being to summarise the findings from the 2009-10 audit carried out by the Audit Commission. It included messages arising from the audit of the financial statements and the results of the work undertaken to assess the Council's arrangements to secure value for money in its use of resources.
- Certification of Claims and Returns Annual Report - This report summarised the findings from the certification of 2009-10 claims and returns that were subject to review by the Audit Commission. The report highlighted that some amendments were required to the grant returns as a result of their work and also provided recommendations to improve arrangements in relevant areas.
- 2010-11 Audit Plan – This report was considered in February 2011 and sets out the audit work that the Audit Commission will undertake for the audit of the financial statements and the value for

money conclusion for 2010-11. It also includes the proposed fee for this work, along with the expected outputs that the Committee can expect to receive.

1.5 **Other** - Other reports / briefings received during 2010-11 included:

- **Housing Benefit Fraud**
 - In July 2010, the annual report covering the work of the Housing Benefit Fraud Team for 2009-10 was presented.
 - In February 2011, a report was considered in respect of making the Audit Committee aware of discrepancies in the number of fraud sanctions reported to it and other stakeholders for the period 2008-09 and 2009-10.
- **Asset Management** – A report was considered in order to get a better understanding the work carried out by both the Audit Committee and the Economy, Regeneration and Transport Scrutiny Board (Scrutiny Board 3) around the area of Asset Management, in order to avoid duplication of coverage.
- **Foster Care Payments** – In response to concerns raised in the Internal Audit quarterly report in September 2010, the Committee considered a briefing note in November 2010 from the Head of Service for Looked after Children, on why progress in implementing audit recommendations was behind schedule. As a result, the Audit Committee requested the Internal Audit and Risk Manager to include a formal follow up review within its 2011-12 plan and report the outcome of the review to the Audit Committee.
- **Business Continuity** – The Committee considered a report providing the Council's current position in relation to the development and testing of Business Continuity Management Plans for the identified "critical services" of the City Council and the related ICT provision to support these. This was as a result of limited progress highlighted by the Audit Commission in their Recommendation Tracking Report. This report highlighted that significant work had taken place in this area, although there was still need for further work especially around ICT arrangements.
- **ICT Service: Progress Report on i-Cov Review and Business Continuity** – This briefing note followed on from the Business Continuity report above. It summarised the position as at February 2011 in relation to the progress of the migration of services from Serco to Coventry City Council in-house ICT provision and the development and testing of Business Continuity to replace provision currently provided by Serco.
- **Purchasing Cards Update** – In response to the ongoing concerns of the Audit Committee, a report was considered in respect of the control environment in place to oversee the use of purchasing cards

within the Council. As a result, it was agreed that a further briefing would be provided in July 2011 to assess the effectiveness of controls from the point of view of compliance.

- **Capital Receipts 2010-11 and Future Forecasting Update** – This report was requested by the Audit Committee as they wished to be kept informed on a six-monthly basis on the progress in obtaining capital receipts from property sales, as well as getting a better understanding of future expected sales.
- **Data Quality** – A report was considered by the Audit Committee in February 2011 in respect of the Council's Data Quality Policy. This report covered two areas - firstly changes in the Council's Policy and secondly an assessment of progress made with implementing the action plan to support the Policy.

1.6 **Audit Committee Priorities** - The Council has made significant enhancements to its Audit Committee arrangements over the last few years and this has been supported through the setting up of a 'stand alone' Audit Committee. Nevertheless, there are still areas for development for the Audit Committee, as follows:

- Formalise training arrangements for the Audit Committee including assessing whether a skills audit would be beneficial in defining training requirements.
- To gain an independent view as to how well the Committee is performing.
- To keep abreast of national developments (e.g. Localism Bill, consultation on the future of local public audit) and the potential impact that these may have on the operation of the Audit Committee.

In 2011-12, the Audit Committee's initial focus will be on ensuring that effective action is taken in response to areas for improvements highlighted in the Annual Governance Statement for 2010-11. From an audit perspective, five areas were identified as a result of work carried out by the Council's Internal and External Auditors. These were:

- Addressing the recommendations highlighted in the Audit Commission's Annual Audit Letter.
- Developing processes to support the implementation across Coventry schools of the proposed new Schools Financial Value Standard.
- Ensuring the effectiveness of arrangements in place to oversee the Council's ICT requirements, post the implementation of the Council's new ICT Service.

- Ensuring that the Council's key financial systems continue to provide adequate safeguards against the risk of fraud, especially in the current economic climate.
- Continue to embed systems covering corporate governance arrangements within the Council, such as declarations of interests and hospitality registers. This will also include gaining assurance that effective arrangements are in place to oversee such activities.

In terms of other priorities, the Audit Committee will continue to focus on:

- Providing challenge and scrutiny of the Council's financial position in 2011-12 and beyond.
- Assessing the quality of the work of both Internal and External Audit to ensure that the Council obtains maximum value from its investment in audit work carried out.
- Ensuring that officers respond promptly to issues highlighted at Audit Committee meetings. This can range from the implementation of audit recommendations through to responding to budgetary control pressures. As part of this process, we will continue to ask officers to attend meetings, if appropriate, to justify their actions especially where progress made has failed to match expectations.

CABINET

30th August, 2011

Cabinet Members Present:	Councillor Mrs Bigham Councillor Clifford Councillor Harvard Councillor J. Mutton (Chair) Councillor O'Boyle Councillor Skipper Councillor Townshend
Non-Voting Opposition Representatives present:	Councillor Blundell Councillor Foster
Other Members Present:	Councillor Gazey Councillor Lakha Councillor Mrs Lucas Councillor Noonan
Employees Present:-	H. Abraham (Customer and Workforce Services Directorate) F. Collingham (Chief Executive's Directorate) T. Darke (City Services and Development Directorate) C. Forde (Finance and Legal Services Directorate) R. Haigh (City Services and Development Directorate) M. Harris (Customer and Workforce Services Directorate) B. Hastie (Finance and Legal Services Directorate) G. Holmes (Chief Executive's Directorate) L. Hughes (City Services and Development Directorate) B. Messinger (Director of Customer and Workforce Services) J. Newton (City Services and Development Directorate) J. Parry (Chief Executive's Directorate) H. Passi (City Services and Development Directorate) J. Pope (City Services and Development Directorate) M. Reeves, (Chief Executive) S. Roach (Community Services Directorate) J. Venn (Chief Executive's Directorate) A. Walmsley (Children, Learning and Young People's Directorate) B. Walsh (Director of Community Services) M. Yardley (Director of City Services and Development)
Apologies	Councillor Duggins Councillor A. Khan Councillor Kelly

RECOMMENDATIONS

39. **Declarations of Interest**

Councillor Foster declared a personal interest in Minute 44 below titled "Government Consultation – Responding to the Open Public Services White Paper" inasmuch as he is a Director of a small ICT firm. Councillor Foster stated that the company had not or would not be involved in tenders for work with the Council. He remained in the meeting for consideration of this matter.

41. **The Coventry Local Development Plan 2013 - 2030**

The Cabinet considered a report of the Director of City Services and Development which set out the Council's draft Local Development Plan, which is proposed to replace the Coventry Development Plan 2001.

The Coventry Local Development Plan (known as the LDF) was the development plan for Coventry, which would replace the Coventry Development Plan 2001. The key document was the Core Strategy, which set out the guiding principles, and to which more detail will be added. This would be through a combination of other development plan documents considering Site Allocations, a new City Centre Area Action Plan, and Community Infrastructure Levy (CIL), as well as Supplementary Planning Documents.

The Council had considered a report on the Core Strategy at their meeting on 6th July 2010 (their minute 36/10 refers). Following consideration of that report, employees had worked together with Members to identify issues facing the City, and options to best manage the future development of Coventry. The Proposed Core Strategy appended to the report was a result of this joint working.

The Core Strategy had to be prepared under the reformed planning system, introduced through the 2004 Planning and Compulsory Purchase Act ("the Act"). The Act, together with the associated regulations, emphasised that community engagement should be 'frontloaded'. It also set out the procedures that were to be followed, including carrying out Sustainability Appraisal and that the Core Strategy must conform generally with the Regional Spatial Strategy. This currently required Coventry to accommodate 14,800 new homes between 2001 and 2021. The Core Strategy had to run for 15 years from the date it would be adopted (2013) so would go beyond the 2021 cut off date for the Regional Spatial Strategy. This meant that the Council would have to agree its own target for new homes, but taking the 14,800 figure into account. It did not mean that the Council would be forced to accept 33,500 new homes between 2006 and 2026, because that version of the Regional Spatial Strategy was never formally adopted.

The Cabinet were advised that the Council could not formally adopt a Core Strategy that was not "sound". To be "sound" a Core Strategy must be justified (founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives); Effective (deliverable; flexible; and able to be monitored); and Consistent with National Policy.

Being able to demonstrate that the Plan was the most appropriate, having gone through an objective process of assessing alternatives, would pay dividends in terms of an easier passage for the Plan through the Examination process. It would also assist in the process of evaluating the claims of those who wished to oppose the strategy.

The Government had indicated that it wished to retain development plans, including Core Strategies, and was considering a presumption in favour of 'sustainable development' in areas that were not covered by an up to date development plan. The Proposed Core Strategy document sought views on what the strategy should be to guide the future development of Coventry.

The revised Statement of Community Involvement (SCI) was also appended to the report and set out how the Council would involve local people, as well as all other stakeholders with an interest in the development of Coventry. It had been revised following the Planning Peer Review, which was completed by an independent panel including both senior officers of other Councils and a Member of a Council's Planning Committee.

The Peer Review identified engagement with the community as a potential improvement, and as a result the SCI was subject to independent scrutiny by a consultancy firm. However, Planning Policy Statement 12 (PPS12) stated that when producing a new or revised Core Strategy, following a major change in circumstances, a rather different level of consultation may be appropriate where some specific aspect of the Core Strategy was being revised.

The Cabinet considered the two realistic options available to the Council at this point. The first was to do nothing and rely on the national planning policies, currently Planning Policy Guidance (PPG), Planning Policy Statements (PPS), and the draft National Planning Policy Framework. However, this option was rejected because it also risked the development of Green Belt and other Greenfield land, in an ad-hoc way.

The alternative option was to proceed towards an up to date LDF. This option offered greater protection for Green Belt and other Greenfield land, as well as numerous other advantages. It offered the opportunity to set local targets to address specific local priorities, and manage the development of Coventry in a cogent rather than ad-hoc way.

It was therefore recommended that each of the documents appended to the report (the Coventry Local Development Plan Proposed Core Strategy 2011; the Revised Local Development Scheme 2011 and the Revised Statement of Community Involvement 2011) be subject to public consultation for six weeks from Monday 19th September 2011.

The Cabinet noted that the Economy, Regeneration and Transport Scrutiny Board (Scrutiny Board (3)) would also be formally consulted as part of this process, as well as Residents' Groups and Ward Forums.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, Cabinet recommend that Council:

- (1) Approve a six week period of consultation, from 19th September - 31st October on the proposed Core Strategy and Statement of Community Involvement**
- (2) Submit the Local Development Scheme to the Secretary of State**

43. A Play Policy for Coventry

The Cabinet considered a joint report of the Director of City Services and Development and the Director of Children, Learning and Young People which sought the approval for a corporate Play Policy.

The Cabinet had approved the development of the Play Policy in October 2009 (their minute 71/09 refers), following the development of the draft policy in conjunction with the Children, Learning and Leisure Scrutiny Board (Scrutiny Board (2)).

Coventry was awarded nearly £2m from the Department for Children, Schools and Families (DCSF) Playbuilder and Big Lottery Play Programme to develop and improve 22 play areas in Coventry by March 2011. The report identified the play areas that had been completed or were at implementation stage.

Through the delivery of this programme, areas of work such as design, community engagement and risk management had developed and progressed to take into account national good practice and guidelines. Over the past three years there had been a lot of work developed nationally in terms of guidance and policy and good practice recommendations.

The work of the Play Strategy had been evaluated and four case studies had been identified, the recommendations of which had been fed into the development of the Play Strategy. Details of the four case studies, located at Canley Brook, Parwood Meadows, Primrose Hill Park and Sovereign Row, were provided at Appendix 3 of the report.

As recommended by Cabinet in October 2009 the development of a corporate Play Policy became part of the work programme for Scrutiny Board 2. The Policy covered the principles of play; practice; community engagement; design; risk management; inspection and maintenance; planning; partners and governance.

Once the Playbuilder and Big Lottery Play Programme came to an end, Children, Learning and Young People's Directorate would cease to play a role in the development or refurbishment of play areas or in the co-ordination of services across the Council. The Play Policy was a means of embedding the good practice which had been developed and the policy decisions which had been taken over the last 3 years. It was important to identify how the policy would be monitored and evaluated. The current Play Champion, Councillor Kelly, had proposed that this be done through regular performance management reports to the Play Champion from the City Services and Development Directorate, where the delivery services responsible for play areas and maintenance sat.

It was therefore recommended that these arrangements be embedded into the portfolio responsibilities for a Cabinet Member, as the Play Champion, currently Cabinet Member (Education).

The draft Play Policy, which was appended to the report, covered the first three recommendations from the report Developing a Corporate Play Policy which was considered by the Children, Young People, Learning and Leisure Scrutiny Board (2) in July 2010 (their minute 6/10 refers).

As part of the work with Scrutiny Board 2, members expressed concern that new housing development plans failed to identify and communicate information about play areas. They stressed that it was important for everyone to know exactly what land was earmarked for as this saved a lot of confusion/frustration later on. This could be done by way of erecting signs on site within new developments which clearly identified that the site was earmarked for a play area to ensure that prospective purchasers of new homes would be clear as to its location.

In addition, Scrutiny Board 2, as part of their task and finish group, recommended that employees draft an agreed form of wording for signs that could be erected on land in housing developments at the start of the construction work, that would be used to mark out space which has been allocated for play. The costs of this would be funded by the contractor.

In considering the report, the Cabinet noted that the Play Policy had a section dedicated to community engagement, based upon the model that had been developed through the Play Strategy. The content of the Play Policy has been developed with the support of Scrutiny Board 2 and play professionals had been consulted and provided an input into the Policy through the North East Play Practitioners group. In addition, children from Broad Heath Urban Explorers after-school club had been consulted on the content of the Play Strategy.

Approval of the Policy would mean that the learning and good practice from the implementation of the Play Strategy 'Something to do' would be mainstreamed into practice and would continue to build upon the successful work developed over the last three years.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, the Cabinet recommend that Council:

- (1) Agree that the role of Play Champion is included in the portfolio of the Cabinet Member (Education), to be nominated on an annual basis at the Council AGM.**
- (2) Agree to delegate authority to the Director of City Services and Development (or whoever the Senior Officer should be) to draft an agreed form of wording for signs that could be erected on land in housing developments at the start of the construction work that will be used to mark out space which has been allocated for play.**

(3) Recommend that the Council approve the adoption of the attached draft Play Policy (Appendix 1) as Council Policy

(4) Recommend that the Council agree that the Play Policy, once adopted, sits under the Core Strategy or equivalent

44. Government Consultation - Implementing Social Housing Reform – Directions to the Social Housing Regulator

The Cabinet considered a report of the Director of Community Services which outlined the Council's proposed response to a government consultation on the draft directions from the Secretary of State to the newly appointed Social Housing Regulator.

On 7th July 2011, the Government published a consultation on the draft directions from the Secretary of State for Communities and Local Government to the Social Housing Regulator. In April 2012 responsibility for social housing regulation will transfer from the Tenants' Services Authority to the Homes and Communities Agency (HCA).

The directions will help inform the set of standards for Registered Social Housing Providers, and included, amongst others, the following proposals:

- Tenure Reform – to allow flexible tenancy agreements
- Rent – to make changes to reflect the introduction of the "affordable rent" model
- Quality of Accommodation – to reinforce the need to maintain housing stock at an appropriate level.

In considering the proposed response, the Cabinet expressed concern at the lack of security for tenants in flexible tenure agreements, and suggested that there should be a number of safeguards for vulnerable households in those circumstances. The Council's full response to the consultation was at Appendix 1 to the report.

The Cabinet also noted that the Economy, Regeneration and Transport Scrutiny Board (Scrutiny Board (3)) would be receiving a report on the impact of proposed changes to housing benefit payments and the affordable rent model.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, Cabinet recommend that Council approve the consultation response.

45. Government Consultation – Responding to the "Open Public Services" White Paper

The Cabinet considered a report of the Assistant Chief Executive, which outlined the proposed response to a Government consultation on the "Open Public Services" White Paper. The White Paper sets out an outline vision of modernised public services where:

- Wherever possible, increase choice
- Public services should be decentralised to the lowest appropriate level
- Public services should be open to a range of providers
- Fair Access is assured

- Public Services should be accountable to users and to taxpayers

The Cabinet noted that, with reference to the principles above, the City Council is ahead of many authorities in that it already commissions its services from a range of providers, and works closely with the voluntary sector in the development of services. The proposed response to the consultation document was detailed in full at Appendix 1 of the report.

In recommending the report to Council, the Chair congratulated officers on the exemplary work done on this report.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, Cabinet recommend that Council approve the consultation response.

46. **Government Consultation – The National Planning Policy Framework**

The Cabinet considered a report of the Director of City Services and Development which outlined the proposed response to a Government Consultation paper on the National Planning Policy Framework.

The Government was consulting on the development of a National Framework to replace various documents issued which provided supplementary guidance on planning matters, in order to consolidate these into a single volume.

In responding to the Consultation document, the Cabinet expressed concern over the proposal to remove offices from the "town centres first" policy, in that it represented a significant risk to the regeneration of the city centre. The Cabinet noted that recent re-developments such as the relocation of the Severn Trent building had made a significant impact on the retail economy in the city centre.

The Cabinet also noted that the framework included the "presumption in favour of sustainable development", in the event that a local plan is out of date, silent, absent, or indeterminate. The implication of this in the short term at least is significant, as existing plans (in Coventry's case the 2001 Coventry Development Plan) would effectively be superseded by the Framework. There will inevitably be a period of policy vacuum between the Framework coming into force and the new Coventry Core Strategy being formally adopted. During this time, the focus would be shifted from determining Planning Applications in accordance with the Development Plan (unless there are material reasons for not doing so) to a presumption of sustainable development unless it could be proven that the harm caused clearly outweighed the benefits of the development.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, Cabinet recommend that Council approve the consultation response.

Cabinet
Council

30th August 2011
13 September 2011

Name of Cabinet Member:

Cabinet Member (City Development) – Councillor Mrs. Bigham

Director Approving Submission of the report:

Director of City Services & Development

Ward(s) affected:

All

Title:

The Coventry Local Development Plan 2013 – 2030

Is this a key decision?

Yes

To approve documents comprising the Coventry Local Development Plan to be published for a 6 week period of public consultation.

Executive Summary:

The Coventry Local Development Plan (LDF) will guide development of Coventry throughout the medium-long term. It will set targets for the amount of development, and manage when, where and how that development takes place. Government has put legal procedures in place that the LDF must follow. The Core Strategy will contain the targets and planning policies to guide development of the city.

Recommendations:

The Cabinet is requested to:

- 1) Recommend that the Council approve for a six week period of public consultation beginning on Monday 19th September 2011 and ending on Monday 31st October 2011 the:
 - i. Proposed Core Strategy (CS); and
 - ii. Statement of Community Involvement 2011; and
- 2) Submit the Local Development Scheme (LDS) to the Secretary of State

The Council is requested to:

- 1) Consider the recommendations of the Cabinet; and
- 2) Approve for a six week period of public consultation beginning on Monday 19th September 2011 and ending on Monday 31st October 2011 the:
 - i. Proposed Core Strategy (CS); and
 - ii. Statement of Community Involvement 2011.

List of Appendices included:

1. Coventry Local Development Plan Proposed Core Strategy 2011
2. Revised Local Development Scheme 2011
3. Revised Statement of Community Involvement 2011

Other useful background papers:

None

Has it been or will it be considered by Scrutiny?

Yes

Scrutiny Board 3 will be formally consulted during the consultation process. It is intended that the Proposed Core Strategy document will be considered during the meeting of September 2011.

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

Yes

The Local Development Framework Cabinet Advisory Panel has informed preparation of the Coventry Local Development Plan Proposed Core Strategy 2011

Will this report go to Council?

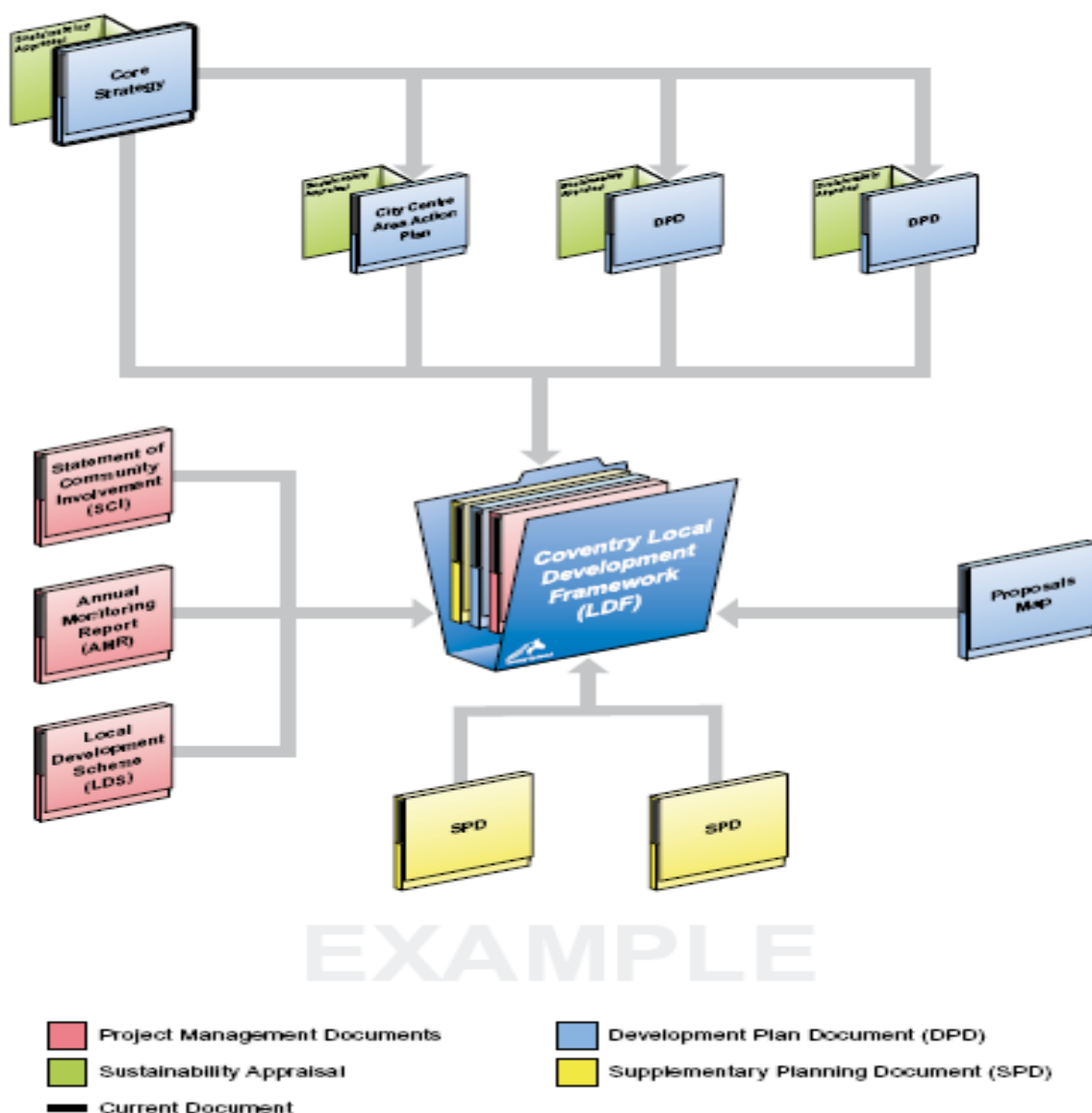
Yes

13th September 2011

1. Context

1.1 The revised Local Development Scheme appears at **Appendix 2**. This is the timetable for the entire Local Development Plan, and will be submitted to the Secretary of State at the appropriate time for approval.

Coventry Local Development Framework Diagram



1.2 The Coventry Local Development Plan is the development plan for Coventry, which will replace the Coventry Development Plan 2001. The key document is the Core Strategy, which sets out the guiding principles, and to which more detail will be added. This will be through a combination of other development plan documents considering Site Allocations, a new City Centre Area Action Plan, and Community Infrastructure Levy (CIL), as well as Supplementary Planning Documents.

- 1.3 Following the Council resolution of 6th July 2010, officers have worked together with Members to identify issues facing the city, and options to best manage the future development of Coventry. The Proposed Core Strategy (**Appendix 1**) is a result of this joint working.
- 1.4 The Core Strategy (CS) has to be prepared under the reformed planning system, introduced through the 2004 Planning & Compulsory Purchase Act ("the Act"). This, together with the associated regulations, emphasises that community engagement should be 'frontloaded'. It also sets out the procedures that are to be followed, including carrying out Sustainability Appraisal. It also sets out that the Core Strategy must conform generally with the Regional Spatial Strategy. This currently requires Coventry to accommodate 14,800 new homes between 2001 and 2021. The Core Strategy has to run for 15 years from the date it will be adopted (2013) so will go beyond the 2021 cut off date for the Regional Spatial Strategy. This means that we will have to agree our own target for new homes, but taking the 14,800 figure into account. It does not mean that we will be forced to accept 33,500 new homes between 2006 and 2026, because that version of the Regional Spatial Strategy was never formally adopted.
- 1.5 The Council cannot formally adopt a Core Strategy that is not "sound". To be "sound" a Core Strategy must be:
- (i) Justified (founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives);
 - (ii) Effective (deliverable; flexible; and able to be monitored); and
 - (iii) Consistent with National Policy.
- Being able to demonstrate that the Plan is the most appropriate, having gone through an objective process of assessing alternatives, will pay dividends in terms of an easier passage for the Plan through the Examination process. It will also assist in the process of evaluating the claims of those who wish to oppose the strategy.
- 1.6 The Government has indicated that it wishes to retain development plans, including Core Strategies, and is considering a presumption in favour of 'sustainable development' in areas that are not covered by an up to date development plan. The Proposed Core Strategy document seeks views on what the strategy should be to guide the future development of Coventry.
- 1.7 The revised Statement of Community Involvement (SCI) appears at **Appendix 3**. This sets out how the Council will involve local people, as well as all other stakeholders with an interest in the development of Coventry. It has been revised following the Planning Peer Review, which was completed by an independent panel including both senior officers of other Councils and a Member of a Council's Planning Committee.
- 1.8 The Peer Review identified engagement with the community as a potential improvement, and as a result the SCI was subject to independent scrutiny by a consultancy firm (free of charge to the Council). However, PPS12 states that when producing a new or revised Core Strategy, following a major change in circumstances, a rather different level of consultation may be appropriate where some specific aspect of the Core Strategy is being revised.

2. Options considered and recommended proposal

- 2.1 There are two realistic options available at this point. The first is to do nothing, and rely on the national planning policies, currently Planning Policy Guidance (PPG), Planning Policy Statements (PPS), and the draft National Planning Policy Framework. This option is rejected because it also risks the development of Green Belt and other Greenfield land, in an ad-hoc way.

- 2.2 The alternative option is to proceed towards an up to date LDF. This option offers greater protection for Green Belt and other Greenfield land, as well as numerous other advantages. It offers the opportunity to set local targets to address specific local priorities, and manage the development of Coventry in a cogent rather than ad-hoc way.
- 2.3 The associated documentation is all required either to ensure legal compliance, or to inform the proposals.
- 2.4 It is therefore recommended that each of the documents appended to this report be subject to public consultation for six weeks from Monday 19th September 2011.

3. Results of consultation undertaken

- 3.1 The consultation undertaken to date has been with the Leader, Cabinet Member for City Development, Cabinet Member for Housing, Sustainability & Local Infrastructure, and the chair of Planning Committee. It is recommended that the documents appearing at Appendices 1 and 3 be subject to extensive formal public consultation.

4. Timetable for implementing this decision

- 4.1 It is recommended that the period of formal public consultation commences on Monday 19th September 2011, running until Monday 31st October 2011.

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

There are no direct financial implications of the recommendations in this report. Staff resources required to inform the consultation documentation and process and update thereafter are provided for within the existing planning service revenue budget.

It should be noted however, that any public examination of the LDF will incur potentially significant costs. These are not specifically budgeted for, however the directorate will endeavour to fund such costs from within the overall cost of the service.

5.2 Legal implications

In accordance with current legislation under the Planning and Compulsory Purchase Act 2004, the Council is required to have the Local Development Framework in place .

6. Other implications

None

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

The LDF, including the CS and SCI will manage development, and allocate land to contribute to the Council's objectives:

- A prosperous Coventry with a good choice of jobs and business opportunities for all the city's residents;
- People of Coventry living longer, healthier, independent lives;

- A safer more confident Coventry;
- Making Coventry's streets, neighbourhoods, parks and open spaces attractive and enjoyable places to be;
- Ensuring that children and young people are safe and enjoy, achieve and make a positive contribution to Coventry;
- A good choice of housing to meet the needs and aspirations of the people of Coventry;
- Making places and services easily accessible for Coventry people;
- A more equal Coventry with cohesive communities and neighbourhoods; and
- Improving Coventry's environment and tackling climate change.

6.2 How is risk being managed?

A risk assessment has been prepared, and identified risks will be managed by the Project Manager.

6.3 What is the impact on the organisation?

Progressing a Local Development Framework to completion requires staff resource, as well as financial commitment. The previous CS was prepared by a team of (up to) 9FTE staff, at a cost in excess of £ ½ m, funded from existing revenue budget and grant monies. The majority of this cost was associated with procurement of independent evidence base documents, which either remain relevant or can be updated/replaced in house. The costs involved this time are publishing documents, sending letters, placing statutory notices in newspapers etc. A team of 4FTE staff is in place to deliver the LDF.

When the LDF is subject to Examination in Public, carried out by an independent Inspector, the Council is required to meet the costs of that. In the case of the previous draft CS this cost was in the region of £115,000.

6.4 Equalities / EIA

An Equality Impact Assessment of the Core Strategy will be completed prior to its Submission to the Secretary of State.

6.5 Implications for (or impact on) the environment

It is intended that the city's carbon footprint will be managed down by the policies within the LDF. The overall strategy will ensure that the pattern of land use across Coventry minimises the need to travel, by focussing services and other facilities near to where people live and work. The subsequent Site Allocations DPD will identify specific land for specific uses, to manage this at a local level.

6.6 Implications for partner organisations?

All individuals, businesses, voluntary organisations, public service providers will be impacted by the LDF, but it is intended that the process we go through will result in stakeholders working together to deliver the strategy, rather than working in silos wholly independently of each other.

Report author(s):

Name and job title:

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Directorate:

City Services & Development

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Enquiries should be directed to the above person.

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Director: Martin Yardley	Director of City Services & Development	City Services & Development	24/05/11	26/05/11
Members: Councillor Mrs Linda Bigham	Cabinet Member for City Development		24/05/11	24/05/11

This report is published on the council's website:

www.coventry.gov.uk/meetings

Appendices

1. Coventry Core Strategy Issues & Options 2011
2. Revised Local Development Scheme 2011
3. Revised Statement of Community Involvement 2011

COVENTRY PROPOSED CORE STRATEGY 2011



Making Coventry a better place to live and work



Coventry City Council

www.coventry.gov.uk

Making Coventry a better place to live and work

Coventry's Core Strategy will set out our plans for the city's future development and will guide the future growth of our city up to 2028. Every Council should have a Core Strategy and the proposed Core Strategy will provide a foundation for developing important new planning policies for the city.

Coventry's final Core Strategy will guide development in the city for the next 15 years or more. It's important that you have your say now so that your views are reflected in the final plan.

Please take the time to read this document, answer the questions on page 10 and add any comments that you think we might find useful.

You can also do this online at www.coventry.gov.uk/ldf or read the documents at:

- any city library
- Civic Centre 4, Much Park Street
- The Council House, Earl Street

We will also be visiting different parts of the city throughout the consultation period so that local people and community groups can talk to us about our proposals. Look out for more information about dates and venues in the local press and on our website.

You can also make comments by e-mail to: localdevelopmentframework@coventry.gov.uk

or by writing to us at:
 Planning Policy
 Floor 6, Civic Centre 4,
 Much Park St,
 Coventry,
 CV1 2PY

If you'd like to know more, or want to discuss any of the issues raised within the document please contact us on:
024 7683 1187

Foreword

Despite the tough economic climate, Coventry has entered an exciting new phase of development.

The regeneration of key parts of our city centre ahead of the Olympic Games, planning approval for a £50 million development on the site of the former sorting office in Bishop Street, progress on plans for the Friargate development around the railway station and Coventry University's new Student Enterprise building are just a few of the exciting schemes underway or planned for the heart of Coventry.

New homes are now being built in the New Deal for Communities area in the North East of the city, many of Far Gosford Street's historic and listed buildings are being saved and more than 1,000 extra people now work in the city centre than did a year ago at the prestigious new Severn Trent Centre.

These are just some of our recent achievements, although there have also been challenges, like protecting our Green

Belt from housing estates while promoting growth in opportunity for everyone and supporting plans for economic prosperity alongside responding to climate change issues and ensuring we can encourage jobs led regeneration and improving public health and well being.

All of this affects the communities we live in, the shops we use, our transport connections, the areas that we work in and the parks and leisure facilities we all use to wind down and enjoy time with our families. It's these issues, which are at the heart of the way we all live, that will be the subject of the Core Strategy.

The first stage in the development of our strategy is called the Proposed Core Strategy. It provides a foundation for developing planning policies and it asks questions about where new investment and jobs should be encouraged, how many new homes should be planned for, how travel connections can be improved, making it easier to travel by bus or bike and how we can make sure that the city centre is a place everyone can be proud of.

Foreword

This document really sets the scene for the detail that will come later. And I hope you will want to take part in the debate and tell us if you think we have got it right, or if we have missed anything.

As you begin to read it you will see that we have kept to our pledge to protect the Green Belt from housing development. This plan for our city's future does not include building homes on the Green Belt. What it does is provide a sensible way forward that supports jobs-led growth. It also recognises that if we are to be a successful and healthy city we need people to live and work here. That means we need to provide employment land in the right place for employment uses and make sure it is connected into communities; this kind of growth also provides advantages for existing residents.

Your response will be used to help us shape the next stage - which is to produce the final Core Strategy. This will of course also be open for debate and discussion.

I look forward to receiving your thoughts.

Cllr Linda Bigham
Cabinet Member for City Development



Coventry - proud to be a city that works

We've developed a vision for the city that focuses firmly on the future and finding ways of delivering the priorities that Coventry people say are most important to them.

This vision lies at the heart of our proposed Core Strategy, and this document aims to explain the context, background and thinking behind the development of the strategy.

Coventry - proud to be a city that works

- for jobs and growth
- for better pavements, streets and roads
- to support and celebrate our young people
- to protect our most vulnerable residents

We're proud to do this by....

- being honest, fair and transparent when we make decisions
- working with residents, communities and partners to get things done
- celebrating all that's good about our city and its future

What we want Coventry to be like

We have a city to be proud of and need to build on our strengths. We also want to support the city's continued growth and development. This does not come at any cost - we have been clear we will protect Green Belt land and green spaces from development. But we still have options about how the city develops in the future, particularly where we will allow new homes to be built and which land we earmark for new jobs.

Coventry - proud to be a city that works

In looking at the issues and options we have for our city, we have been clear that the top priority for us is to make sure any growth is jobs led. That means we identify land for new employment - and with that comes the need for new homes. This is the right way round for a city like ours, it is the sustainable way, providing homes for local people who work and spend their money locally. Coventry has historically grown this way, with people moving here to work and then making their home and settling here. This kind of jobs led growth has helped to shape the city and means Coventry has grown naturally - with people at its heart.

In deciding on the best way forward we looked at a range of options for the ways we can guide the growth of the city. After eliminating any proposal to build in the Green Belt, one option has emerged as the best way forward. This involves focusing development in the city centre, the heart of the city, and on key areas across the city including Willenhall/Whitley, Bell Green/Wood End/Henley Green, Canley, Foleshill and Arena Park, and Holbrook.

This plan, which we have called the hub and spokes plan (with the city centre as the hub and the other areas as the spokes) will help us to:

- stop the Green Belt being used for housing estates
- encourage regeneration
- support sustainable development
- bring brown field land back in to use
- support local shopping centres, health provision and other services
- improve roads and public transport on key routes in to the city
- reduce the city's carbon footprint
- use the land required for new homes efficiently
- provide easy access to the jobs already available
- focus on the city centre as a showcase for the whole city
- improve the health and well being of Coventry citizens

Coventry - proud to be a city that works

We particularly welcome your comments on the hub and spokes option, and also anything else you think is relevant to the development of our city.

Previous draft Core Strategy documents were subject to a number of public consultations, and peoples' views on these documents were:

- Green Belt and other green land should be protected from development of housing estates
- support for jobs-led development strategy
- the quality of the city centre shops and overall environment should be improved
- more family homes are needed

We will also be preparing a plan to allocate specific land for new development across the urban area of Coventry. This will make sure that there is enough land available to meet our needs for the next 15 years at least. However, we need our Core Strategy in place first.

How the plans work together

Core Strategy: The most important document for the city, which will set out strategic policies to say how, where and when the city will grow.

City Centre Area Action Plan: Will provide detailed policies and allocate land for regenerating the city centre

The Site Allocations Plan: Will identify specific sites throughout the city for new homes, jobs and shopping developments.

The Community Infrastructure Levy: Will require developers to make a financial contribution towards delivering key infrastructure in Coventry. This could include new roads, schools, health facilities and green space.

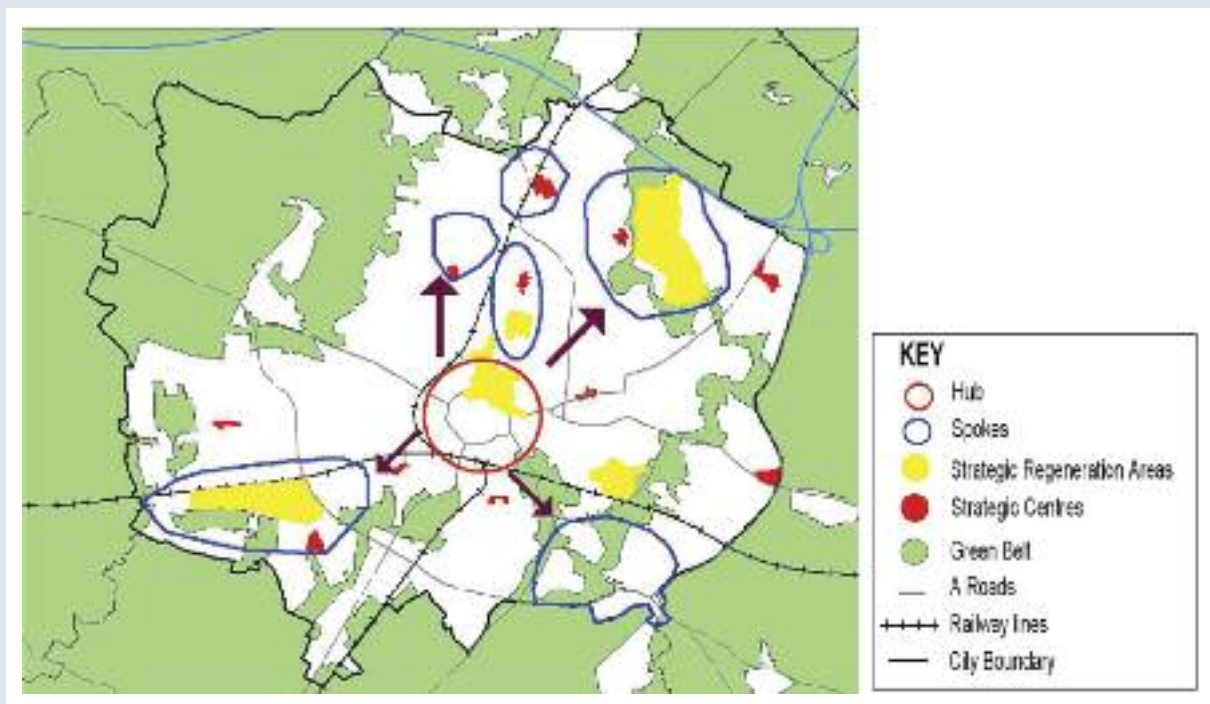
As well as the four main documents the overall plan will also contain supplementary policy on specific areas of detail such as climate change and car parking. The plan will also be monitored annually to ensure it is achieving its aim and objectives.

A Proposals Map will provide a visual impression of key policies, and a **Statement of Community Involvement** will inform the people and businesses of Coventry how the Council will communicate with them when drawing up these policies. All this will then become the **Coventry Local Development Plan**.

A new way forward for our city

Coventry people have been very clear with us about the importance of protecting our Green Belt and greenfield sites from residential development, so part of our proposed strategy, informed by the Sustainability Appraisal (SA/SEA), protects the Green Belt and other greenfield land from development of housing estates.

Overall we want to protect Coventry's Green Belt from development of housing estates and focus on encouraging urban regeneration which supports existing centres, advocating sustainable development principles.



A new way forward for our city

The strategy shows major development within Coventry city centre and development in the "spoke" areas of the city; Canley (including the railway stations at Tile Hill and Canley), Foleshill, Wood End, Whitmore Park, Arena Park and Willenhall.

The types of location for development within our hub and spokes model would generally justify a high density of development and a need for innovative urban design to enhance the environment. Green spaces in urban areas will be protected and homes could be provided in conjunction with greater public access to provide additional green space. Focusing development in accessible parts of the urban area as well as being more sustainable could provide greater access to, and improve the viability of, health facilities and schools. Focused investment in transport routes will be needed to make sure people have safe access and can travel easily around the city.

Why we think the hub and spokes model works

- It implements a jobs-led strategy in an integrated way
- It supports regeneration by focusing jobs and investment where they are most needed
- It prevents the need for housing estates on Green Belt and greenfield sites
- Homes will be built near where people work
- Focusing on the city centre will help stimulate ongoing investment from the private sector and will see the city centre becoming a showcase for the rest of Coventry
- Higher density development in clusters is a more efficient use of land
- Local facilities across the city will be improved
- We will be able to adapt to changes more easily if we need to grow more quickly
- It helps to improve the health and well being of the citizens of Coventry

A new way forward for our city

- Having facilities grouped together in spokes across the city will encourage healthier lifestyles, with easier access to health and recreational facilities locally
- It will encourage us to walk and cycle more and there will be better public transport links, improved air quality and our carbon footprint will be reduced
- Development is focused in the most accessible locations to make it as easy as possible for people to get to work, shop and use leisure facilities

Possible issues

Developing the city centre successfully will rely on private sector investment, and so we'll make sure that the benefits of developing in the city centre are clearly explained in detailed development documents. We also know that the public sector will need to take an active role in focusing private sector investment towards our new priority hub and spoke areas.

We also know that we need to continue to invest in public transport and good roads across the city so that spoke areas will not have major traffic congestion issues and that it's easy for people to get in and out of the city centre.

What do you think?

- Do you like this strategy?
- If not, what alternative strategy would you suggest?

What happens next?

We are asking for your views until 31 October 2011. We will then consider every response we receive and report them to a meeting of the full Council, and we will take all responses into account when we write the submission draft, or final version of our strategy (this will take place at the end of the year and early 2012). Councillors will then discuss this version at a meeting of Full Council before it is finalised and published. Next Spring we will send all the representations we've received about the draft document with our evidence and the Core Strategy itself, to the Secretary of State who will appoint an independent Inspector to hold a series of public hearings – these are likely to happen in Summer 2012.

When the hearings are finished, the Inspector will write a report, which is likely to be completed and sent to us towards the end of 2012. We will carefully consider this report before adopting the plan. At that point it will become the legal development plan for Coventry, and we expect that to happen in 2013.

You can answer the questions on page 10 online at www.coventry.gov.uk or read the documents at:

- any city library
- Civic Centre 4, Much Park Street
- The Council House, Earl Street

We will also be visiting different parts of the city throughout the consultation period so local people and community groups can talk to us about our proposals. Look out for more information about dates and venues in the local press and on our website.

You can also make comments by e-mail to: localdevelopmentframework@coventry.gov.uk

or by writing to us at:
 Planning Policy
 Floor 6, Civic Centre 4,
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 Coventry, CV1 2PY

If you'd like to know more, or want to discuss any of the issues raised within the document please contact us on:

024 7683 1187

COVENTRY LOCAL DEVELOPMENT SCHEME 2011



COVENTRY LOCAL DEVELOPMENT SCHEME
 SEPTEMBER 2011
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GLOSSARY OF TERMS UNDER THE PLANNING AND COMPULSORY PURCHASE ACT 2004

Coventry Development Plan	CDP	The adopted Unitary Development Plan for the City of Coventry
Local Development Scheme	LDS	A programme of what is to be produced, the timescales and arrangements for production.
Local Development Framework	LDF	The portfolio of Local Development Documents which constitute the planning policies for the City.
Local Development Document	LDD	One of a number of documents which make up the LDF, including Development Plan Documents and Supplementary Planning Documents.
Development Plan Document	DPD	One of a number of documents which are part of the development plan for the City and which are subject to independent testing.
Core Strategy	CS	The document which will set out the vision, objectives and spatial strategy for the City.
Supplementary Planning Document	SPD	A document which elaborates on policies in DPDs and does not have development plan status. It requires community involvement in line with the SCI or minimum regulations.
Statement of Community Involvement	SCI	A document which sets out how stakeholders and communities will be involved in the process of producing LDDs. The SCI will be subject to independent testing.
Annual Monitoring Report	AMR	A report which assesses the implementation of the LDS and the extent to which the policies are being achieved.

1. INTRODUCTION

The Planning System

- 1.1 The basis of the planning system is the Local Development Framework (LDF). This comprises a collection of documents which include: Development Plan Documents (DPDs); Supplementary Planning Documents (SPDs); a Statement of Community Involvement (SCI); and this document, a Local Development Scheme (LDS).
- 1.2 Thus, the Local Development Framework for Coventry will comprise a set of connected individual documents, progressively replacing the current Coventry Development Plan 2001. A significant difference from the latter is that it will not be subject to complete review and revision every five or ten years: different individual documents will be revised, added or removed, as necessary.

Role of Local Development Scheme

- 1.3 The purpose of the Local Development Scheme is to set out the documents that Coventry City Council intends to prepare and programme as part of the new planning policy framework. It also provides a starting point for the community and interested parties to become involved and help to continue to shape the City's planning policies.
- 1.4 The LDS is a mandatory requirement of the Act and is a public statement of the Council's programme of work. It is published on the City Council's website, which can be viewed at www.coventry.gov.uk.
- 1.5 The LDS can be reviewed, as necessary, either because monitoring has shown a need for revision or because there is a need to prepare a new DPD. Any review will involve public consultation and will be submitted to the Secretary of State.

Planning in Coventry

- 1.6 The current development plan for Coventry is the City of Coventry Unitary Development Plan – the Coventry Development Plan (CDP), which was adopted in December 2001. This plan is based on three central themes: Economic Regeneration; Social Equity; and Environmental Quality. In 2007, and again in 2009, policies were formally "saved", recognising that they were consistent with national policy and up to date. In addition to the statutory CDP, the City Council has prepared area and topic based Supplementary Planning Guidance (SPGs) which assist in the planning decision-making framework.

2. LOCAL DEVELOPMENT FRAMEWORK – SUMMARY

Structure and Timing

- 2.1 The Statement of Community Involvement was adopted by the City Council in November 2006. It outlines how the City Council involves local communities and stakeholders in the preparation of the constituent parts of the LDF and also major planning applications. It has regard to the consultation strategies of both the City Council and the Coventry Partnership, particularly aiming to reduce potential duplication.
- 2.2 Key overall strategy policies will be developed in the Core Strategy that deliver the Sustainable Communities strategy. Clearly the programming of the documents is very important and work will be required to be undertaken simultaneously in order to achieve a cogent LDF. Each LDD being proposed by the City Council is set out in Section 5. The timetable and programming of each document is also set out, including the pre-submission and post-submission timelines.
- 2.3 The diagram below illustrates the proposed LDF structure for Coventry.

LOCAL DEVELOPMENT SCHEME
STATEMENT OF COMMUNITY INVOLVEMENT
CORE STRATEGY Vision, Strategic Objectives and Policies, Deliverability
SITE ALLOCATIONS DPD
PROPOSALS MAP
COMMUNITY INFRASTRUCTURE LEVY DPD
CITY CENTRE AREA ACTION PLAN DPD
SUPPLEMENTARY PLANNING DOCUMENTS

Saved Policies

- 2.4 In September 2007 the vast majority of policies in the CDP were saved. It is intended that the Core Strategy will supersede the saved policies.

Supplementary Planning Guidance and Supplementary Planning Documents

- 2.6 SPG prepared under the former planning system can retain its status as a material consideration, provided that it is linked to saved policies. SPD elaborates on specific DPD policies and it is possible for SPG to be transferred into SPD.

3. RESOURCES, INPUTS AND MANAGEMENT

General Arrangements

- 3.1 The broad resources and management arrangements for each LDD are set out in Section 5. In general, the principal resources for overall lead of the process, LDF preparation and the monitoring of progress on the LDF will come from the Policy Team in the City Services & Development Directorate. Other officers and resources from within the Directorate, other Directorates of the City Council, the Coventry Partnership, other networks and constituent agencies and organisations will also be involved in the process to a significant extent. Consultants may also be used to assist with specific aspects of preparation.

Political Management

- 3.2 DPDs will be approved by the City Council, although their preparation will be overseen by the Cabinet Member (City Development). A Local Development Framework Members' Advisory Panel will provide a steer.
- 3.3 As a non-Development Plan Document, the Statement of Community Involvement has been approved by the Cabinet. Supplementary Planning Documents will be approved by Planning Committee.

Evidence Base

- 3.4 Development plans need to be underpinned by sound evidence to support planning policies and the Government has reiterated this in regard to LDFs. The documents will continue to be produced either by, or for, the City Council and will be made publicly available. In addition, there are two further major sources of information. Firstly, there will be documents published to support strategic plans of Council services (such as Housing) and major partners (such as Transport and Health providers). Secondly, the Policy Team maintains a Land Availability System, which records land use across the City and monitors planning applications. Monitoring will identify any need for further reviews of the LDS.

Monitoring

- 3.5 The City Council regards monitoring as an integral part of the planning process and, in particular, it sees an objectives-led monitoring system as essential so that policy and implementation measures can be evaluated and reviewed as an ongoing process. The findings of the AMR will inform the need to review the LDS and consider the need for further DPD's, The AMR will be publicly available, sent to key stakeholders and published online.

3.6 Annual Monitoring Reports will:

- assess progress against targets and milestones within LDDs;
- provide information in relation to targets;
- assess the need for review in circumstances where policies are not working effectively or objectives are not being met.

4. CONTACTS AND AVAILABILITY

4.1 For more information about any of the issues raised in this Local Development Scheme, please contact Jim Newton:

Planning Policy
City Development Directorate,
Coventry City Council,
Floor 6, Civic Centre 4,
Much Park Street,
Coventry,
CV1 2PY

Telephone: 024 7683 1187
Email: ldf@coventry.gov.uk

5 LOCAL DEVELOPMENT FRAMEWORK - DETAILS

LOCAL DEVELOPMENT SCHEME SUMMARY

The table below summarises the programme for the preparation of individual Local Development Documents

		Core Strategy	Site Allocations	City Centre Area Action Plan	Community Infrastructure Levy
2011	Jan – Mar				
	Apr – Jun	I			
	Jul – Sep				
	Oct – Dec				
2012	Jan – Mar	S		I	
	Apr – Jun				
	Jul – Sep				
	Oct – Dec	R		S	
2013	Jan – Mar	A	I		I
	Apr – Jun				
	Jul – Sep				
	Oct – Dec		S	R	S
2014	Jan – Mar			A	
	Apr – Jun				
	Jul – Sep				
	Oct – Dec				
2015	Jan – Mar		R		R
	Apr – Jun				
	Jul – Sep		A		A
	Oct – Dec				

Key

I = Publication of Issues and Options Paper

S = Submission of DPD to the Secretary of State

R = Inspectors report

A = Adoption of DPD

LOCAL DEVELOPMENT SCHEME : SCHEDULE OF PROPOSED LOCAL DEVELOPMENT DOCUMENTS

Document Title	Status	Role and Content	Chain of Conformity	Dates for pre-submission consultation	Date for public participation on emerging options	Date of submission to Secretary of State	Proposed date of adoption
Statement of Community Involvement	n/a	Sets out standards and approach to community involvement	n/a				Adopted November 2006. Amended July 2011
Core Strategy	DPD	Sets out spatial vision, objectives and overall strategy	Consistent with national planning policy	December 2011	July 2011	April 2012	March 2013
Site Allocations	DPD	Identifies specific sites to accommodate new development	Consistent with Core Strategy and national policy	December 2013	March 2013	December 2013 / January 2014	March 2015
City Centre Area Action Plan	DPD	Sets out specific strategy and identifies specific development sites within city centre	Consistent with Core Strategy and national policy	December 2012	March 2012	December 2012 / January 2013	July 2014
Community Infrastructure Levy	DPD	Sets out infrastructure requirements, costs, and enabling mechanism for regular review through SPD	Consistent with Core Strategy, City Centre Area Action Plan, and national policy and regulations	December 2013	March 2013	December 2013 / January 2014	July 2015

LOCAL DEVELOPMENT DOCUMENTS

CORE STRATEGY

Role	To set out the vision, objectives and spatial strategy for the future development of the City, linking with the themes of the Coventry Sustainable Community Strategy and demonstrating its deliverability
Coverage	City-wide
Status	Development Plan Document

Conformity

The Coventry Development Plan Proposals Map will be revised through the Core Strategy.

Thus, the Proposals Map is likely to be formally amended in March 2013, with the adoption of the Core Strategy.

Timetable

Stage	Estimated Dates
Start	Jan 2011
Issues & Options Consultation	September 2011
Publication of Submission Document	February 2012
Submission (incl Sustainability Report) to Secretary of State	April 2012
Pre-Hearing Meeting	August 2012
Hearing commences	September 2012
Receipt of Inspector's Report	December 2012

Arrangements for Production

Political DPDs will be approved by the City Council. Political responsibility for the producing the Core Strategy will rest with Cabinet Member (City Development)

Internal Led by Planning & Policy Manager and prepared by Planning Policy Team, supported by colleagues from other departments and agencies

External Resources

Community and Stakeholder Involvement In accordance with the SCI

SITE ALLOCATIONS

Role To allocate sufficient specific land to deliver the Core Strategy

Coverage City-wide

Status Development Plan Document

Conformity

The Coventry Development Plan Proposals Map will be revised through the Site Allocations.

Thus, the Proposals Map is likely to be formally amended in March 2014, with the adoption of the Site Allocations.

Timetable

Stage	Estimated Dates
Start	Jan 2013
Issues & Options Consultation	March 2013
Publication of Submission Document	December 2013
Submission (incl Sustainability Report) to Secretary of State	January 2014
Pre-Hearing Meeting	August 2014
Hearing commences	September 2014
Receipt of Inspector's Report	December 2014

Arrangements for Production

Political DPDs will be approved by the City Council. Political responsibility for the producing the Core Strategy will rest with Cabinet Member (City Development)

Internal Led by Planning & Policy Manager and prepared by Planning Policy Team, supported by colleagues from other departments and agencies

External Resources

Community and Stakeholder Involvement In accordance with the SCI

CITY CENTRE AREA ACTION PLAN

Role To set out the vision, objectives and spatial strategy for the future development of the City centre, linking with the themes of the Core Strategy and allocating specific land to ensure its deliverability

Coverage City centre

Status Development Plan Document

Conformity

The Coventry Development Plan City Centre Proposals Map will be revised through the Area Action Plan.

Thus, the City Centre Proposals Map is likely to be formally amended in July 2015, with the adoption of the City Centre Area Action Plan.

Timetable

Stage	Estimated Dates
Start	Jan 2012
Issues & Options Consultation	July 2012
Publication of Submission Document	December 2012
Submission (incl Sustainability Report) to Secretary of State	January 2013
Pre-Hearing Meeting	August 2013
Hearing commences	September 2013
Receipt of Inspector's Report	January 2014

Arrangements for Production

Political DPDs will be approved by the City Council. Political responsibility for the producing the Core Strategy will rest with Cabinet Member (City Development)

Internal Led by Planning & Policy Manager and prepared by Planning Policy Team, supported by colleagues from other departments and agencies

External Resources

Community and Stakeholder Involvement In accordance with the SCI

COMMUNITY INFRASTRUCTURE LEVY

Role To set out the vision, objectives and spatial strategy for the future development of the City, linking with the themes of the Coventry Sustainable Community Strategy and demonstrating its deliverability

Coverage City-wide

Status Development Plan Document

Conformity

The Infrastructure Delivery Plan, enshrined within the Core Strategy, will be updated regularly. The Community Infrastructure Levy DPD will contain provision to regularly review the costs of delivering infrastructure, and hence the amount of the Levy itself.

It will be prepared in accordance with relevant regulations issued by Government.

Timetable

Stage	Estimated Dates
Start	Jan 2013
Issues & Options Consultation	July 2013
Publication of Submission Document	December 2013
Submission (incl Sustainability Report) to Secretary of State	January 2014
Pre-Hearing Meeting	August 2014
Hearing commences	September 2014
Receipt of Inspector's Report	January 2015

Arrangements for Production

Political DPDs will be approved by the City Council. Political responsibility for the producing the Core Strategy will rest with Cabinet Member (City Development)

Internal Led by Planning & Policy Manager and prepared by Planning Policy Team, supported by colleagues from other departments and agencies

External Resources

Community and Stakeholder Involvement In accordance with the SCI

APPENDIX 1 - SUPPLEMENTARY PLANNING DOCUMENTS

Supplementary Planning Guidance (SPG)

Following the adoption of the Core Strategy, a review will place to prioritise preparation of SPD's to supersede existing SPG. In the interim, they will remain a material consideration

The City Council has adopted the "Delivering a More Sustainable City" SPD in January 2009 and is consulting on an SPD titled "Urban Design Framework for the City Centre"



Statement of Community Involvement

September 2011

This is a revision of the Council's Statement of Community Involvement (SCI) adopted in November 2006. A revision is necessary to reflect the changes to the Planning Regulations since the original SCI was introduced and sets out the different stages of Local Development Framework (LDF) production and new methods of consultation for community involvement.

It is now in draft form and is published for public consultation. The draft is presented with 'tracked changes' so that deleted and revised text can be seen more easily.

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1.0 Introduction

1.1 Coventry City Council wants local people and organisations to be more involved in plans for their community whether in long term visions for their area or in specific planning proposals.

Purpose

1.2 The purpose of this Statement of Community Involvement is to set out the Council's policy for involving the community in the preparation and revision of all Local Development Documents and in consultations on planning applications. The Statement of Community Involvement:

- is a clear public statement enabling the community to know when and how they can get involved in the preparation of local development documents, and how they will be consulted on planning applications.
- sets out the standards to be achieved and how the minimum legal requirements for consultation will be met or exceeded.

1.3 Effective community involvement in the planning system brings several benefits. Involvement can:

- help to promote planning as a strategic, proactive force for delivering sustainable development.
- lead to outcomes that better reflect the views, aspirations and needs of the wider community in all its diversity.
- improve the quality and efficiency of planning decisions, by drawing on local knowledge and possibly reducing potential conflict.
- promote social cohesion by making connections with communities and offering them a tangible stake in decision making.

Scope

1.4 The Statement of Community Involvement covers:

- consultation arrangements for the preparation and review of all Local Development Documents in the Local Development Framework, whether they are development plan documents or supplementary planning documents.
- arrangements for consulting on all new developments before and after planning applications have been submitted.

1.5 The Statement of Community Involvement also informs consultations on changes to the public realm (streets, squares, paths, parks) carried out by the Council, whether or not planning permission is required and the development of new public buildings.

1.6 The Statement of Community Involvement does not directly cover consultation on matters not to do with spatial planning. However, it does cover the co-ordination of consultation on spatial planning with consultation on other matters.

Vision – why we need a Statement of Community Involvement

1.7 In endorsing this Statement of Community Involvement, Coventry City Council expects to fulfil a vision:

Our vision is a city where:

- people and organisations from all backgrounds and communities are able to engage in planning for sustainable development.
- the knowledge and foresight of residents and planners is combined to prioritise and detail planning policy to meet current and future needs.
- all stakeholders, elected members and officers have a high level of awareness of planning policy and processes and built environment quality issues.
- highly skilled staff with a commitment to community engagement facilitate an open, transparent and accessible process.
- shared values, protected in agreed policy, underlines a spirit of partnership between stakeholders.

1.8 Achieving this vision will lead to a user-friendly, attractive and sustainable city.

1.9 An inclusive approach to community involvement means understanding the makeup, needs, interests and capacity of different groups in the community. Identifying and understanding the needs of groups will enable consultation programmes to be designed in a way that makes it easier for people to engage with the planning system.

1.10 Our vision for engaging ‘organisations of Coventry’ embraces public, private, voluntary and community sectors, including businesses, associations, groups and agencies of all kinds either based in, or having an impact on the city.

1.11 Sustainable development is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. A key requirement of sustainable development is the effective involvement of local people, groups and businesses in the planning of their community.

Objectives – what we are aiming to achieve

1.12 Coventry’s Statement of Community Involvement has five objectives. These objectives say what we aim to do to fulfil our vision of engaging people and organisations in planning Coventry’s future. We aim:

- to help make the planning system transparent, by making plans, policies, development proposals and planning decisions available in a form which is easily understood and accessible to all.
- to make the planning system proactive by combining the knowledge of residents and planners to provide greater foresight in anticipating and satisfying future needs for planning policy.
- to promote participation and involvement by presenting clear opportunities for people to make their views known and to take part in the planning process, and by demonstrating that people’s views have been considered by decision-makers.

- to make the planning system accessible and inclusive, by removing barriers to involvement and by reaching out to groups that have been less engaged in the past.
- to be accountable, by clearly identifying decision-makers and processes and ensuring that people get feedback about progress and outcomes.

1.13 The schedule of previous consultation activity and partnership meetings that have been undertaken in respect of Coventry's developing SCI include:

- SCI informal consultation (21.04.05 – 16.05.05) – 'Have Your Say' questionnaire.
- The Council and the Equalities & Communities Local Strategic Partnership Theme Group meeting (24.05.05) – Draft SCI presentation and discussion.
- Draft SCI Pre-submission public participation (04.07.05 -15.08.05).
- The Council and Community Empowerment Network (CEN) meeting (25.07.05) – Draft SCI presentation and discussion.
- The Council and Community Empowerment Network (CEN) sub group meetings (14.09.05, 21.11.05 and 20.12.05) – Towards a revised draft of the SCI.
- Submission Draft SCI public consultation (10.04.06 – 22.05.06).

Why review the SCI now?

1.14 Central government guidance in the form of Planning Policy Statement 12, means that Coventry City Council has to use this document to prepare its plans. This was updated and published in September 2008. The government guidance made reference to the SCI to better help engage with the public, developers and any other interested party in the development of their local area.

1.15 The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 introduced important new changes to the system on how to consult with the community and other stakeholders. Coventry's existing SCI which was adopted in November 2006 requires reviewing and updating so that it takes into account the new guidelines from central government.

1.16 The key principles of the SCI remain the same but the major areas of change in light of the updated PPS12 reflect:

- Changes to the process for preparing LDF documents (Chapter seven);
- Changes to the planning application stage now incorporated information on public involvement in planning obligations (Chapter eight), and
- The tests of soundness have changed from nine tests to three.

2.0 Background

The new planning system

2.1 The Government introduced a new planning system through the Planning & Compulsory Purchase Act 2004. Under this new system Coventry's Development Plan will be replaced by a Local Development Framework. This will consist of a family or a portfolio of Local Development Documents, which together provide the framework for delivering the spatial planning strategy for the area. These include:

- Local Development Scheme
- Core Strategy
- Development Plan Documents
- Area Action Plans
- Supplementary Planning Documents
- Annual Monitoring Report
- Statement of Community Involvement

(Please refer to Appendix E, which explains the meaning of these terms).

2.2 As part of the Local Development Framework, each local planning authority is required to prepare a Statement of Community Involvement. The Statement of Community Involvement is essentially a document setting out the processes for involving Coventry's stakeholders, residents and community groups in influencing new plans, policies and decisions in respect of specific development proposals.

2.3 The Statement of Community Involvement seeks a 'step change' towards creating a more proactive and inclusive planning system. The Coventry Statement of Community Involvement has gone through a number of stages to ensure that the community has been involved throughout the process to adoption. Like all development plan documents, the Statement of Community Involvement has to be tested for its 'soundness' before it can be adopted. An independent Inspector was appointed to hear any issues relating to 'soundness'. The Statement of Community Involvement forms part of the Coventry Local Development Framework. Figure 1 illustrates the main stages in the preparation of the Statement of Community Involvement.

The tests of soundness

2.4 When considering the submitted Statement of Community Involvement, the Planning Inspectorate considered whether the Statement of Community Involvement was 'sound' against the following criteria:

- Shows how the authority meets its legal requirements
- Links with other community initiatives
- Identifies groups/bodies to be consulted
- Shows how local people, community and voluntary groups and others will be involved in the Local Development Document process

- Sets out appropriate involvement techniques
- Identifies resources for community involvement
- Demonstrates how involvement will feed into Local Development Document preparation
- Sets out mechanisms for reviewing the Statement of Community Involvement procedures.

2.5 The Inspector began with the presumption that the Statement of Community Involvement was 'sound' unless shown to be otherwise in evidence. Please visit the Planning Inspectorate website for more information in assessing the soundness of Statement of Community Involvements: www.planning-inspectorate.gov.uk

2.6 All representations relating to the submitted Statement of Community Involvement were reported to the Planning Inspectorate. An independent Inspector was appointed and an Examination took place to consider the views of partners before reaching a view. This view is binding, and, subject to several recommendations, the Council's Statement of Community Involvement is sound.

Sustainability Appraisal and Strategic Environmental Assessment

2.7 The Sustainability Appraisal of all Development Plan Documents and Supplementary Planning Documents will incorporate the requirements of the EU Strategic Environmental Assessment Directive, which aims to assess the likely significant environmental effects of plans and programmes.

2.8 The purpose of undertaking a Sustainability Appraisal is to promote sustainable development through better integration of the social, economic and environmental considerations into plans. A Sustainability Appraisal is integral to plan making and the Coventry Partnership's Environment Theme Group will be actively engaged in this process and other groups will be welcome to contribute.

How the Statement of Community Involvement affects the planning process

2.9 The Council, as local planning authority, must comply with the standards of consultation contained in the adopted Statement of Community Involvement when preparing and reviewing relevant documents in the Local Development Framework and in considering planning applications. The Council will therefore meet not only the minimum standards set by Regulations but also undertake a wider range of community involvement as described in later sections.

2.10 The Regulations state that all Development Plan Documents and Supplementary Planning Documents must be accompanied in their final stages by a statement of compliance. The statement must set out who has been involved, how they were consulted, a summary of the issues raised and how those issues have been addressed.

2.11 Failure to meet the standards as set out in the adopted Statement of Community Involvement could result in Development Plan Documents being unable to progress through to adoption and leave Supplementary Planning Documents open to challenge. The primary test for Development Plan Documents when subject to Examination is that they are 'sound', as defined in Government guidance. One test of soundness is that the document has been prepared in accordance with the adopted Statement of Community Involvement.

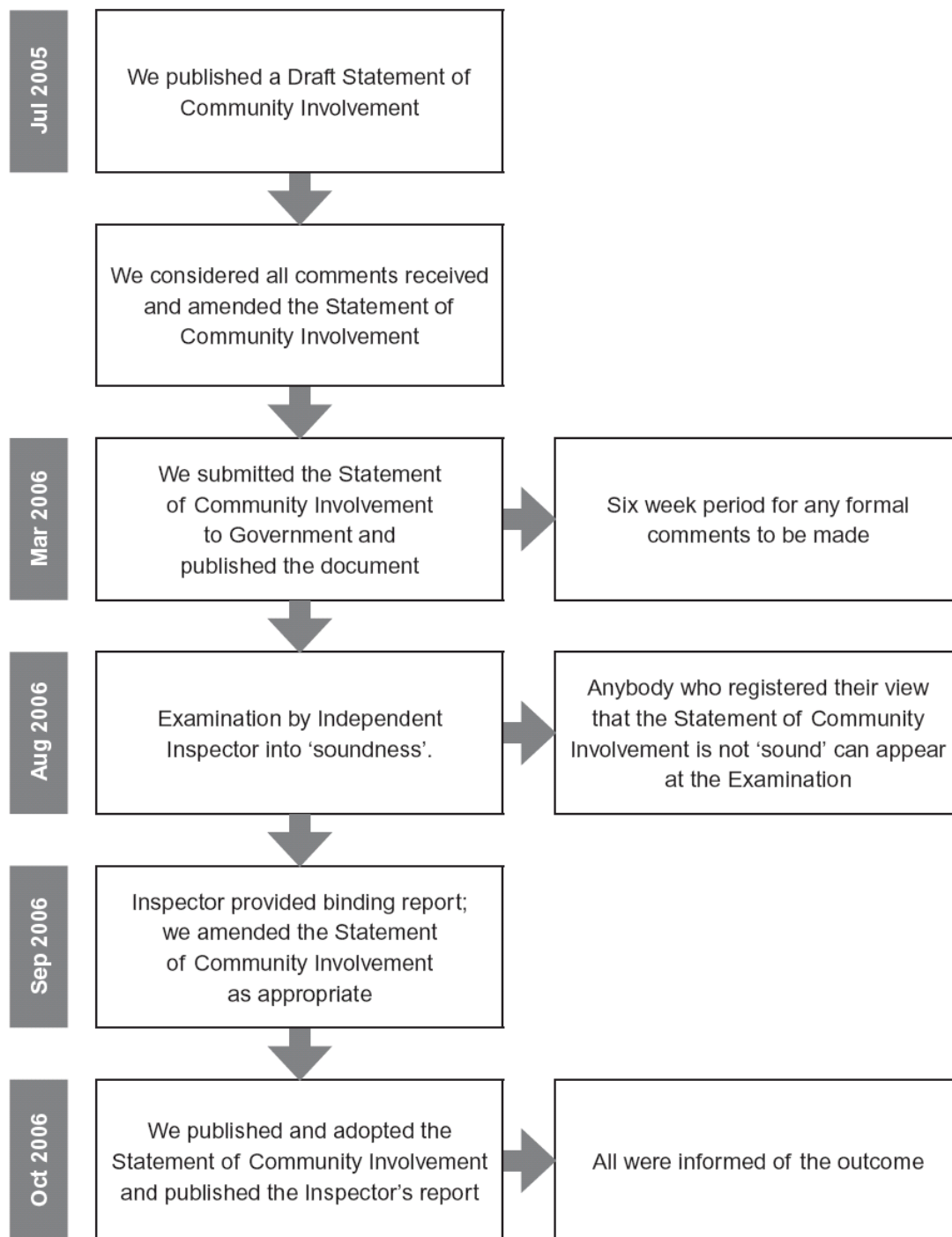
2.12 In respect of planning applications the Regulations set minimum requirements for notification of applications through site notices and in some instances press notices.

2.13 This Statement of Community Involvement provides information on the key principles that would underpin involvement. It is not intended that the Statement of Community Involvement should prescribe consultation and participation approaches for every situation. It does aim to set a 'menu' of possible approaches that may be used over time and explains the arrangements for choosing from that 'menu'. Feedback from consultations will help partners to evaluate which approaches are most effective in different circumstances.

2.14 The Statement of Community Involvement reinforces the importance of the Council's active approach to involvement in planning, including the value the Council places on the contributions from a wide range of people within the community.

2.15 Greater and more satisfactory involvement in the planning process will be achieved if more of Coventry's citizens, particularly those in positions of leadership in their communities, are conversant with the planning system, consultation principles and techniques and built environment quality issues. The Council is committed to working with all its partners to develop proposals and identify resources for community capacity building.

Figure 1: Main Preparation Stages of the Statement of Community Involvement



3.0 Coventry's Community Profile

Area and Population

3.1 The most recent data from the ONS estimated the total population of Coventry in 2009 to be 312,800 people. Significant growth in the population size of Coventry is forecast by the ONS; it is projected to reach 324,400 in 2014. This growth rate of 3.7% over 5 years is broadly in line with the national population growth rate, but the population of Coventry is expected to grow faster than comparable urban areas in the 5 years up to 2014. Coventry is a city with data from the 2001 census indicating a population of 300,800 covering an area of 9,980 hectares or 38 square miles.

3.2 The age structure indicates the City has a smaller percentage of people in the 45-59 age range and a higher percentage of people in the 30-44 age ranges compared to the UK average. The City attracts 35,000 university students each year, with a transient population in the 20-24 age group.

Ethnicity and Religion

3.3 Just over a quarter of the population in Coventry are from Black and Minority Ethnic (BME) Groups (26% in 2007). In the same year about a third of children in Coventry's schools were from a BME background; by 2009-10 Coventry's school population had become more diverse still. The younger age structure of the BME communities in Coventry means that ethnic diversity is set to increase and it is estimated that by 2031 just over a third (35%) of the city's population will be people with a BME background. The 2001 Census headline findings indicate that 84% of the population is White British, though 4% of these declare themselves as White Irish. Of all Coventry residents, 2% declare themselves as being of mixed ethnicity. Some 12% of the population is Asian or Asian British, with Indians (8%) and Pakistanis (2%) forming the largest groups and with Bangladeshis representing 0.6% of Coventry's population. The other significant ethnic minority group is Chinese people at 0.7%.

3.4 People identifying themselves as Christian stand at 65%. The next largest group is people with no religion at 15%, followed by Sikhs at 5%, Muslims at 4% and Hindus at 3%. There is a small Buddhist community at 0.3% and a Jewish community at 0.1%.

Communications and Travel

3.5 Coventry is at the centre of the UK with direct access to five motorway links serving the whole of the UK road network. Of the total number of people who have jobs in Coventry, 66% live in the City. Of those commuting in, 25% come from Nuneaton and Bedworth, with only 1% using the train service.

3.6 Coventry Airport offers commercial flights to UK and European destinations and also operates a service for businesses together with a cargo facility. London is one hour away by train with Coventry situated on the busiest Intercity line in the country.

Jobs and Employment

3.7 In 2004, Coventry had 29% of its labour force in the top three Managerial Professional categories compared to 36% for the West Midlands and 41% for the UK. There are 145,000 jobs in the City, compared with 146,000 in 1981. During the last 25 years jobs in manufacturing have decreased from 38,500 to 18,400, whilst jobs in distribution, hotels and business services have increased from 24,000 to 39,900.

3.8 The number of jobs created in Coventry over the last three years is 5,800 (at Prologis Business Park, Tesco, Ricoh Arena, TUI at Coventry Airport, Westwood Business Park and the NHS Institute for Learning, Skills and Innovation). The latest figures reveal 131,000 (74%) economically active residents of the City are in employment compared to 123,000 (66%) in 1995. The average household income is £27,700 compared to a national average of £31,000.

Housing

3.9 There are 122,400 households living in a range of accommodation from executive properties to starter homes and City Centre apartments. In 2005, there were 4,970 vacant dwellings in Coventry.

3.10 The 2001 Census figures show there were marked trends in household composition with households with married or cohabiting couples with dependent children forming a minority of around 20% of households. The number of one-person households stood at 31%, which was higher than in Warwickshire or the West Midlands. More than half of these were non-pensioner households. Lone parents headed 8% of households.

3.11 There were marked contrasts between prosperous and less prosperous wards in Coventry. Bablake had the highest number of pensioner single households at 19%, but were significantly below the city average for non-pensioner single households at 12%. By contrast, St Michaels had one of the lowest rates of pensioner households at 12% but the highest rate of non-pensioner households at 25%.

4.0 Principles

4.1 The principles of good community engagement in planning are widely recognised and documented. The principles set out below aim to underpin the involvement strategy of the Local Development Framework and in determining planning applications. The principles have been developed through the Coventry Community Plan, Coventry Corporate Plan, National Policy Statements and examples of good practice across the City and beyond in planning and regeneration activities.

Early engagement

4.2 'Front-loading', beginning consultation at the earliest opportunity, will ensure that people recognise they have the opportunity to make a difference to plans and proposals, and that they experience a sense of ownership throughout the planning process. It is not sufficient to invite people to comment once proposals have been worked up. Involvement at the formative stage of policy development and review or a particular development proposal, is essential to achieve a sense of community ownership over the policies that will shape the future development of the City and improve the quality of development.

Community engagement fit for purpose

4.3 Arrangements should be built on a clear understanding of the communities' needs and aspirations depending on the nature of the planning purpose. It is essential that all main interest groups and key stakeholders are aware and respect a common understanding of the approach adopted. This is particularly relevant in communities where they may be sceptical of others trying to gain territorial advantage. People will want to be involved for a variety of reasons including: curiosity, fear of change, financial gain, neighbourliness, professional duty, protection of interests or socialising. The need to recognise different agendas is important so that the consultation technique(s) employed can aim to embrace all sections of the community.

Transparency and openness

4.4 The process of consultation and people's roles should be clear and transparent at all levels of engagement so people know when they will be able to participate. Being open and straightforward about the nature of the activity will generally mean communities will participate more freely as they may have a greater understanding and trust of the process. This also means being clear about what is 'on offer'. Clear explanations as to what can and cannot be influenced and how the results will be used and what feedback will be given are essential.

4.5 The Coventry Compact Code of Practice on Consultation says:

- Be clear on the quantity and quality of consultation required and design the process accordingly.
- Be clear on how much consultation you can resource and prioritise. Check what consultation has already been done and whether it can be used.
- If a decision has already been taken, make it clear that consultation is on the impact of that decision. Concentrate on supporting those affected in managing that impact, and communicate the decision as soon as possible.
- Be clear on what options are being consulted upon and why, setting out pros and cons fairly and explaining constraints.

Building local capacity and trust

4.6 Genuine long-term community sustainability depends on developing local links and partnerships. The continuing opportunities to develop local skills and involve local people in surveying their own situation, running their own programmes and managing local assets cannot, and should not be underestimated.

Involve all those affected across all sections of the community

4.7 Planning tends to work best if all parties are committed to the process. Activities in which key players (such as landowners or planners) sit on the sidelines are all too common and rarely achieve their objectives completely. Investment in time spent winning over cynics before formal consultation can be worthwhile. If there are people or groups, who cannot be convinced at the outset, keep them informed and give them the option of joining in later on.

4.8 Planning documents need to be in plain language, satisfying clear print standards and available in different formats to encourage wide readership; paper and electronic versions will be necessary, and languages other than English, large print, audio and Braille versions should be provided on request wherever practicable. Techniques and practical arrangements need to be tailored to engage the relevant parts of the community. Locations and venues for document inspection, exhibitions and meetings must be accessible for disabled people and convenient for the target communities and neighbourhoods. Meetings must be inclusive in the way that they are organised.

4.9 The Coventry Compact Code of Practice on Consultation says:

- Recognise and be creative about the barriers that keep people out of consultations, such as the timing of the consultation meetings or language barriers. Use local people as peer researchers to access voices which are often missed, don't just rely on meetings with the usual consultees.
- Identify and involve a broad cross section of those who will be affected.

Employ a mixture of methods

4.10 The choice of involvement methods will be crucial, as different people will want to take part in different ways. For instance, some will be happy to write letters, others will prefer to make comments at an exhibition or take part in workshop sessions. A flexible approach needs to be adopted in selecting different techniques and methods of engagement. There is also a need to consider which people may be affected and how people will get involved, what facilities are available and how to work with agencies such as Planning Aid to help communities let their voice be heard.

4.11 Use independent agencies to organise consultation where a statutory agency has a vested interest in one particular outcome.

Building consensus and accepting disagreement

4.12 The process of engagement aims to build as wide as possible consensus around plans for the future of the City and individual development proposals. It is recognised, however, that the nature of planning involves choices and implies decisions as to the weight attached to conflicting economic, social and environmental objectives. All partners enter the process understanding that consensus may not be achieved and that final plans or decisions may disappoint them. Disagreement with particular plans or decisions should not undermine the spirit of partnership or imply disloyalty to the City. It must be recognised by all that the role of Councillors is to represent the community and they are accountable through the ballot box. They have the statutory responsibility for decision making.

Provide feedback

4.13 It is essential for building trust and ensuring future engagement, as well as being a courtesy to those who have been involved, that the contribution of participants in consultation is acknowledged and that they are able to track the influence that their views had on the final outcomes.

The Coventry Compact Code of Practice on Consultation says:

"Outline the real reasons why a decision has gone a particular way, and what balance of views came across in the consultation".

4.14 The Council will produce schedules, which show its response to comments during consultations.

Monitor and evaluate consultations

4.15 It is essential that mechanisms be put in place to feedback from communities on the process of engagement, and to monitor its effectiveness and its effect on built environment quality and the efficiency of the planning system. Methods used need to be evaluated by partners to inform future practice and the possible review of this Statement of Community Involvement.

5.0 Links with Other Community Involvement Initiatives

5.1 The Council aims for a co-ordinated approach to achieving priorities through integrated strategies and initiatives. A wide range of other strategies have a bearing on the Statement of Community Involvement. At the most strategic level, are the Coventry [Sustainable Community Plan Strategy](#) and the Council's Corporate Plan. Others range from strategies on housing to the economy. It is recognised that we need to aim to avoid communities being overloaded with consultation. Therefore, [any the lessons learnt under feedback on other community engagement strategies will behave](#) fed into [a possible this](#) review of the Statement of Community Involvement [through monitoring](#). Further details on the Council's other published strategies can be obtained from its website by accessing the following web address:

www.coventry.gov.uk/info/100004/your_council_and_democracy

[Coventry Sustainable Community Plan Strategy \(2003-20102008\)](#)

~~5.2 The Coventry Community Plan sets out priorities and direction of the City and has been developed taking into account all agencies that deliver and influence change. The Local Development Framework will sit alongside the Community Plan to deliver local priorities for development.~~

~~5.3 The Core Strategy of the Local Development Framework aims to give spatial expression to the Community Plan by reflecting the eight key themes. The Local Development Framework is therefore the delivery mechanism for the Community Plan's strategic objectives as they effect the built environment. The themes cover a number of topics and have a direct input into the work on the Local Development Framework. The themes are:~~

- ~~•Jobs and Our Local Economy~~
- ~~•Health and Well-being~~
- ~~•Environment~~
- ~~•Community Safety~~
- ~~•Equalities and Communities~~
- ~~•Learning and Training~~
- ~~•Housing~~
- ~~•Transport~~

~~5.4 The Cultural Partnership is a citywide partnership, which is supporting the delivery of the Community Plan through a themed approach, rather than a community of interest. It is a cross-cutting partnership in that it will be working within its own sector and across all of the eight theme groups of the Coventry Partnership. The links are between the chair of the Cultural Partnership attending the leaders and advisors meetings and a support officer to the Coventry Partnership. They have been included in the revised Community Plan.~~

~~5.5 Links to the Coventry Community Plan will be achieved by:~~

- ~~•consultation with the eight theme groups of the Coventry Strategic Partnership on~~

~~the Local Development Framework.~~

- ~~• ensuring that the results of consultation with the wider community on the Local Development Framework are fed back to the theme groups and inform the implementation and review of the Coventry Community Plan.~~
- ~~• seeking opportunities to combine consultation on local development documents with consultation on the revision of the Community Plan.~~

5.2 In order to develop a locally tailored approach to engagement it is necessary to understand the key planning issues facing Coventry. Accompanying the Local Development Framework is the Coventry Sustainable Community Strategy (Coventry: The Next Twenty Years) (2008). This indicates a number of challenges with regard to community engagement based upon the demographics of the local population. They include:

- The young profile of the City. The City is young in comparison to the national profile, most probably due to the number of students living in the area. Children and young people, tend to be more difficult to engage in consultation;
- The existing ethnic diversity of the City. The City is diverse with almost one quarter (22%) of Coventry's inhabitants coming from minority ethnic communities compared to 13% for England as a whole. The largest groups are Asian and Asian British communities, which together make up 11% of the city's population, these groups are followed by White Irish (4%) and Black or Black British (2%). The larger ethnic groups are well established and networks have been created by which these communities can be engaged;
- The increasing diversity of the City. A large number of new communities are settling in Coventry, including Somalian, Polish, Kurdish, Afghani and Iraqi groups. There are over 100 languages spoken in Coventry and this can be a challenge, particularly regarding the costs of producing materials for consultation and ensuring that all groups are included; and
- Deprivation in the City is starting to decrease but is high relative to national standards. The Coventry Partnership has identified 31 priority neighbourhoods in the City that are the most disadvantaged and will require specific engagement.

Coventry Corporate Plan (20052008/096 - 20072010/0811)

5.6 The Plan sets out the city's vision for Coventry, which is for Coventry to be: "... proud to be a city that works:

- for jobs and growth
- for better pavements, streets and roads
- to support and celebrate our young people
- to protect our most vulnerable residents

We're proud to do this by...

- being honest, fair and transparent when we make decisions
- working with residents, communities and partners to get things done
- celebrating all that's good about our city and its future".

- 5.7 The Corporate Plan sets out the strategic direction and improvement priorities for Coventry City Council for the three years from 2008/09 - 2010/11. It shows how the council plans to work to deliver the city's vision for Coventry by providing leadership; delivering services and through working closely with our partners and local people. It builds on and updates the council's previous Corporate Plan,

[reflecting the progress we have made over the last twelve months.](#)
[To find out more about the council's vision, objectives and values, download the Corporate Plan 2008/09 - 2010/11.](#)

www.coventry.gov.uk/info/10020/policies_and_plans/405/corporate_plan

~~The Council's current Corporate Vision is as follows:~~

~~"The Council wants Coventry to be a growing accessible city where people choose to live, work and be educated and businesses choose to invest."~~

~~5.7 To successfully implement the Council's Corporate Vision we need to understand and review the main issues which concern our local communities. Links with the Coventry Corporate Plan will be made by:~~

- ~~• Adopting an integrated and linked approach to consultation in addressing local community issues.~~
- ~~• Identifying opportunities to combine the public involvement processes required for Local Development Framework preparation, major sites, and planning applications with those required for other Council initiatives and strategies.~~

Coventry City Council - A Strategy and Guidance for Consultation and Participation (2003)

5.8 This document was published in April 2003 and sets out the way in which the Council aims to engage with individuals, groups, businesses and the community through consultation and participation.

5.9 Although designed specifically as a guide for staff to support the Council's overall framework for Best Value, the Statement of Community Involvement interprets its provisions, as they would apply to the Local Development Framework. Links with this document will be made by:

- Ensuring that due regard has been given to the documents key principles.
- Adopting an integrated and linked approach to consultation in addressing local community issues.
- Drawing upon extensive community consultation methods.

~~West Midlands Regional Spatial Strategy (RSS) – (2004)~~

~~5.10 This is a statutory planning document prepared by the West Midlands Regional Assembly and approved by the Government. It sets out what should happen, where and when across the West Midlands Region up to 2021. Key issues that are covered include; the amount of housing, cities and towns targeted for growth, where major new employment sites are needed, how and where to improve the environment and the priorities for transport investment. Links with the RSS will be made by:~~

- ~~• Ensuring that due regard has been given to the Statement of Public Participation. This can be accessed by using the following web address:
www.wmra.gov.uk~~

Coventry Development Plan (CDP) – (2001)

5.11 Adopted in 2001, the CDP remains the principal land use planning document to guide the extent, form and nature of development up to 2011. Links with the Coventry Development Plan will be made by:

- Drawing upon the extensive community consultation carried out in the CDP process.

Neighbourhood Plans

5.12 The Council, led by the Neighbourhood Management service, is working with local communities to produce Neighbourhood Plans. These plans will form one of the foundation stones of Coventry's Strategy for Neighbourhood Renewal and can, where appropriate, inform the need for Area Action Plans.

5.13 We will ensure that the Local Development Framework links with neighbourhood plans by:

- Neighbourhood Management Service meeting with the Planning Service at an early stage in the development or revision of Neighbourhood Plans to ensure that existing Local Development Framework policies and plans are taken into account.
- The Planning Service having an early involvement in consultation around Neighbourhood Plans to ensure that spatial planning issues are not neglected.
- A process being developed to decide on priorities for Area Action Plans in the City and where possible combining consultation on Area Action Plans and Neighbourhood Plans.

Coventry Compact

5.14 The Coventry Compact is an agreement on the relationship between the voluntary and community sector and the statutory sector in the City. It includes three codes of conduct covering attitudes, consultation and funding. The Code of Conduct on Attitude and the Code of Conduct on Consultation are particularly relevant to this Statement of Community Involvement.

5.15 Links with the Coventry Compact will be made by:

- Ensuring that this Statement of Community Involvement reflects the Codes of Conduct.
- Ensuring that lessons learnt from the implementation of the Statement of Community Involvement are fed back into any future revisions of the Compact.

5.16 The Council and its partners in the community recognise that achieving the 'step change' in community involvement required by the new planning legislation represents a challenge. There have been instances of good practice in Coventry over recent years, as well as a number of recent improvements and innovations. Nevertheless, it is acknowledged that there is a perception by some groups that the principles of good community engagement have been applied inconsistently. This section describes the key measures needed to rise to the challenge.

6.0 Meeting the Challenge

6.1 The Council and its partners in the community recognise that achieving the 'step change' in community involvement required by the new planning legislation represents a challenge. There have been instances of good practice in Coventry over recent years, as well as a number of recent improvements and innovations. Nevertheless, it is acknowledged that there is a perception by some groups that the principles of good community engagement have been applied inconsistently. This section describes the key measures needed to rise to the challenge.

Who will be involved?

6.2 The various agents identified below will play an important role in supporting the successful implementation of the Statement of Community Involvement. The groups and organisations listed in Appendix A, some of which are members of the networks identified below, will also play a key role at various stages during the preparation of all policies, plans and planning applications.

Councillors

6.3 It is important that Councillors, as the democratically elected representatives of their Wards, have a clear role in the planning process. This is distinct from the role, which some Councillors will exercise as members of committees of the Council. Therefore, all Ward Councillors will be provided with regular updates to enable them to be kept informed, participate and engaged with their Wards at each stage of the planning process.

The Coventry Partnership

6.4 The Coventry Partnership is the local name for Coventry's Local Strategic Partnership (LSP). The Partnership is made up of representatives from Coventry's key public, private, community and voluntary organisations. They are all working together to deliver Coventry's Community Plan.

6.5 The Coventry Partnership is the main network the Council uses to interact with partner organisations and interested parties. Direct partnership working has already been established, with a planning officer sitting on each of the eight theme groups.

6.6 The Coventry Partnership prepares the Community Plan, which provides a context for the Local Development Framework. The Partnership has worked on planning issues at its theme group meetings and will continue to do so, as appropriate. The findings and priorities will be represented within the Local Development Framework documents.

6.7 It is anticipated that the Coventry Partnership Board and theme groups will provide input into decisions on the Core Strategy and other strategic issues, particularly how and when the Local Development Framework can deliver some of the objectives of the Community Plan.

6.8 This Statement of Community Involvement proposes to set up, with the agreement of the LSP, a sub-group of the LSP, following the model of its theme

groups. This will be a balanced representation of the Coventry community. The proposed sub-group will monitor the implementation of the Statement of Community Involvement and will feedback at least once every six months to identify possible improvements, innovations and initiatives to the Statement of Community Involvement process and techniques based upon local experience. Such a report will be submitted to the Council for consideration and disseminated to the responsible Cabinet Member.

Coventry Community Empowerment Network (C.E.N)

6.10 Coventry Community Empowerment Network (CEN) is a network of over 200 community groups. CEN enables groups to network, share information and skills, and provides opportunities for groups to come together throughout the year to engage with key decision-makers and take action on issues. Since it was set up in 2002, CEN has become the largest network of community groups in Coventry and its regular workshops are a key contact point for groups across the City. Coventry CEN plays a key role in the Coventry Partnership, facilitating community representation on the full Partnership Board and at Theme Group level, as well as wider engagement of the community sector through workshops and other mechanisms. CEN's success in bringing community voices into the Partnership has gained national recognition.

6.11 A Steering Group of community activists, elected by and accountable to its membership, manages the Coventry Community Empowerment Network. As a network of community and user-led groups, CEN does not have a legal entity but is supported by Coventry Voluntary Services Council, its Responsible Body. CEN does not always aim to speak as a single voice, but to bring a genuine community perspective to partnership working and decision-making. Its values are set down in its Terms of Reference:

“to be inclusive, to value the diversity of Coventry’s communities, and aim to reach consensus in its decisions.” Membership is open to any Coventry community or user-led group or local network. A high proportion of its member groups represent priority neighbourhoods and marginalised communities, particularly black and minority ethnic, faith, disability and older people’s groups.

6.12 As there are 2 Community Empowerment Network representatives and 1 City Council representative from the Planning Service on each of the 8 Theme Groups of The Coventry Partnership, there is already a strong foundation for meaningful and integrated joint working. A dedicated sub group within the Community Empowerment Network has been set up to assist in the successful delivery of the Statement of Community Involvement. A further group is assisting with the development of the Core Strategy.

6.13 As a recognised representative of communities of place and interest in the city, the CEN is a key reference point for discussion on the Statement of Community Involvement and will be strongly represented on the proposed Statement of Community Involvement Review Group.

Forum for Constructing Excellence (FORCE)

6.14 Coventry FORCE is a body representing the construction sector in the Coventry area. It was formed following a period of consultation, in 2000. It is a networking forum for new business and a mechanism for sharing good practice. The forum can also be used to share concerns and can be aired and communicated to other parties. Above all, it is a 'one-stop-shop' for matters relating to the construction industry in Coventry and Warwickshire.

Statutory consultees

6.15 The Government requires the Council to consult certain organisations. These are listed in Table 1 of Appendix A. They are sent copies of Local Development Framework documents as a matter of course and are consulted at all stages. They are often involved in early discussions on particular issues and development sites where their work and provision of services and facilities may be affected.

General and other consultees

6.16 Table 2 of Appendix A lists other types of consultees who the City Council will consult on Local Development Framework documents where appropriate. Table 2 lists bodies, which represent the interests of voluntary, racial, ethnic, religious and disabled groups in the city and beyond.

Hard to engage groups

6.17 There is some disadvantage experienced by communities in Coventry, which has already been identified in the Coventry Community Plan. This Plan lists the following city-wide communities of interest:

- Students
- Disabled people
- Disaffected young people
- Ex-offenders
- Homeless people
- Looked after children (children and young people in the care of social services)
- Older people experiencing isolation and poverty
- People from the most disadvantaged black and minority ethnic groups
- People experiencing mental ill-health
- Refugees and asylum seekers
- Children and young people
- Women and children experiencing domestic violence

6.18 In addition there may be groups which are not disadvantaged but which are still hard to engage with, such as small businesses.

6.19 In order for the Statement of Community Involvement to realise its vision, it is vitally important for us to identify and understand the needs of the 'hard to engage' groups specifically related to planning matters in the city. The Council will have regard to the requirements of the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act, 2005 in preparing Local Development Framework

documents and consulting on planning applications. LDF documents and any related literature can be made available in a variety of formats e.g. Braille, large print, audio cassette, languages other than English. Documents in other formats can be obtained from:

Planning and Building Control

Civic Centre 4

Much Park Street

Coventry CV1 2PY.

Tel: (024) 7683 1219 Fax: (024) 7683 1259 Email: ldf@coventry.gov.uk

6.20 The Council has undertaken research to help further identify the 'hard to engage' groups in the Coventry context specific to planning matters. This important piece of work aims to evidence the types of groups who may find it difficult to actively engage and get involved in the planning process. The research is available to view on the Council's website: www.coventry.gov.uk/ldf. The findings are helping to further develop the techniques and methods for furthering the involvement of the identified 'hard to engage' groups. The approach to engage, consult and involve the 'hard to reach' groups in Coventry is set out in table 2.

Planning Aid Service

~~6.21 WMPAS can enable communities and help prepare them for their involvement in the development plan process and planning applications. The more people know about and understand the planning system the easier it is for them to make a contribution to it. With additional funding from central government the focus for the new expanded Planning Aid service will be as an outreach service working with communities.~~

~~6.22 The Council grant, along with other grants, aids the operation of WMPAS and we will continue to engage with the service at key stages in the preparation of Development Plan Documents in order to maximise local community involvement. WMPAS can achieve this through providing advice and training on the new development plan process and assisting groups and individuals in planning appeals.~~

Existing forums for involvement

Ward Forums

6.23 The Council had a network of Area Forums intended to facilitate effective involvement in local decision making. These have been reviewed following the reform and re-launch of the Council's Neighbourhood Management Action Service in order to make them more effective and open. Ward Forums may be a mechanism for front loading community engagement on policy development and major proposals.

Coventry by Design Forum

6.24 This was first set it up in 1998 to feed into the Urban Design Study, which was published in 1999. It is a means of ongoing engagement with all who may have an interest in the design, development and physical regeneration of the city. It is also an opportunity to contribute to and influence the content and quality of urban design projects.

6.25 In order to accord with the principles of the Statement of Community Involvement the Coventry by Design Forum will adopt the following good practice:

- As far as possible papers will be circulated in advance of any meeting.
- The list of invitees to the Coventry by Design Forum will be integrated with the Single Consultee Database (see para 6.31).
- All attendees will be provided with feedback, which will enable them to track how their contribution has influenced decision making.

Development Forum

6.26 ~~A 6 month experiment presently underway is the Development Forum.~~ This is intended to enable the engagement of Councillors and members of the public in pre-application discussions in a structured manner, with a view to promoting quality development and facilitating engagement with communities at the earliest opportunity.

6.27 Developers are encouraged to undertake targeted consultation in the local area when formulating their proposals. They are then given the opportunity to make a presentation to all Members of the Council and any other interested parties. They should describe their proposal and explain how they believe the proposal relates to the Coventry Development Plan (CDP) 2001, how it fits in with local needs and preferences and any other matters that they consider support their proposal. A question and answer session on factual matters follows.

6.28 In order to accord with the principles of the Statement of Community Involvement the Development Forum will adopt the following good practice:

- Developers will include in their presentation how they have undertaken early engagement and to show the outcomes.
- Plans to be presented at the Forum will be available to be viewed at least seven days in advance and after the meeting.
- The list of invitees to the Development Forum will be integrated with the Single Consultee Database (see para 6.31).
- It will be made clear, after each presentation, to whom comments should be made (this will be the developer or his/her professional advisor).
- Developers will be encouraged to include in their submission a clear and detailed account of how comments received influenced their final proposal.

Residents Liaison Forum

6.29 The Residents Liaison Forum was set up in 2002 in order to continue to improve customer service and help groups to understand how the planning system works and to encourage engagement in it.

6.30 Meetings are held at least every three months. The purpose is to discuss general planning issues rather than site-specific matters and starts from the viewpoint that the more people know about and understand the planning system the easier it is for them to make a contribution to it. Discussions involve working practices, changes in legislation and discussion on specific planning issues (telecommunications, advertisement regulations). Specific actions that have arisen to date include the introduction of a late night opening of the planning reception with duty planning officers, changes to site notices to make them more visible and the introduction of special envelopes to highlight the importance of neighbour notification letters. This forum can also be used to explain the new Local Development

Framework approach to policy review and ensure greater involvement.

6.31 In order to accord with the principles of the Statement of Community Involvement the Residents Liaison Forum and the list of invitees to the Development Forum will be integrated with the single consultee database.

Consultee and Access Point Databases

6.32 A single database will be maintained by all sections of the Council concerned with consultation on spatial planning. This will provide contact details for the organisations described in Appendix A. It will specify:

- what matters the organisation wishes to be consulted on.
- what forums they are invited to.
- whether they receive weekly planning lists.
- their preferred method of communication (to reduce costs electronic communication will be encouraged).

6.33 Any organisation will be able to check whether they are on the list, the accuracy of the details and what meetings (Coventry By Design, Development Forum, Residents Liaison Forum) they are invited to. They will be able to ask to be added to the list, amend their details, or request to be invited to a particular forum.

6.34 A single database of community access points will also be maintained. These include libraries, community centres, social clubs and places of worship and their associated facilities. As well as location, contact details, and access information, the database will specify whether each access point is suitable as:

- a venue for exhibitions, workshops and meetings.
- a place where plans could be kept for viewing by local residents.
- a place where support could be given to access planning information online.

Staff Awareness and Training

6.35 Throughout the preparation of the Statement of Community Involvement a programme of awareness raising has been undertaken amongst all relevant Council staff. This included staff in City [Services and](#) Development Directorate and staff of other relevant sections, which include Neighbourhood [Management Action](#) and Corporate Policy Unit. This programme of awareness raising will continue.

6.36 All Council employees are entitled to a minimum of three days training per year. The City Council is committed to enabling staff training on community involvement techniques.

Community Capacity Building

6.37 Greater and more satisfactory involvement in the planning process will be achieved if more of Coventry's citizens', particularly those in positions of leadership in their communities, are conversant with the planning system, consultation principles and techniques and built environment quality issues. The Council is committed to working with our community partners, particularly the Community Empowerment Network, to develop proposals and identify resources for community capacity building on planning, engagement and design.

Resources

6.38 The Planning Section in City Development Directorate will undertake a significant proportion of the engagement. Finances have been allocated ~~using the Planning Delivery Grant (PDG)~~ to recognise this commitment.

~~6.39 The Council is, as a matter of urgent priority, committed to adding to the present Planning Service through the introduction of a new post. The new post holder will be expected to oversee the performance of the Statement of Community Involvement, undertake monitoring and possible reviews, help people understand the new planning system and therefore be able to contribute to plan development rather than just responding to specific planning applications. In addition, the post holder will also be available to assist groups in understanding proposals and how they sit when considered against policy. It will also provide a clear link with our interface with neighbourhoods and the Coventry Partnership.~~

6.40 Considerable resources are allocated to engagement through the Planning Advisory Desk and commitments towards officer attendance at evening meetings, ranging from informal gatherings in residents' front rooms to formal presentations at Area Forums.

6.41 Where landowners, developers or external organisations choose to carry out pre-application consultation exercises (as encouraged by this SCI) they will be responsible for the cost. The Council will assist and possibly take part itself in these exercises. There may be opportunities for using skills and experience in the community itself, though this may require some financial or in-kind support.

6.42 Planning resources are already used in a variety of ways for engaging with the broad Coventry community, including the Coventry By Design Forum, Residents' Liaison Forum, Development Forum and specific arrangements in key regeneration areas. Informal meetings and presentations to discuss specific schemes are held ~~and the Planning Section provides annual grant funding to Planning Aid West Midlands~~ to provide ~~independent~~ assistance to individuals and groups on planning issues.

6.43 Joint working with other Council departments such as Coventry Direct, ~~and Neighbourhood Action~~ enable additional resources to be levered in to community engagement activities. In addition, our partnership arrangements with community and voluntary sector organisations can unlock their volunteer resources to enable community engagement with ~~spatial~~ planning matters and development proposals to be further enhanced in the City.

~~6.44 As previously indicated, Planning Delivery Grant is being used to supplement existing budgets. The funding from any further Planning Delivery Grant monies could cover the following work:~~

- ~~• Develop the evidence base by using, where appropriate, consultants to carry out technical studies.~~
- ~~• Manage and facilitate consultations and community involvement events including the costs associated with the Examination process.~~
- ~~• Staff development in community engagement.~~
 - ~~• Community capacity building.~~

7.0 Consultation and Involvement in the Local Development Framework

7.1 This section details and develops further the specific consultation methods, techniques and delivery mechanisms in relation to Coventry's developing Local Development Framework, which can be viewed on the Council's website: www.coventry.gov.uk/ldf. The documents, which will be subject to the standards in this Statement of Community Involvement, are listed below:

- Core Strategy
- Topic Based Plans
- Area Action Plans
- Proposals Map
- Supplementary Planning Documents

7.2 The Council recognises that there is always scope to improve how it listens to and communicate with stakeholders and the wider community. The Statement of Community Involvement applies to all engagement, consultation and involvement for plans and planning applications are required to be prepared in accordance with it.

Our Pledge:

"We will continue to evaluate the methods that work and those that do not, in order to improve representation and the balance of involvement in the continued preparation of development plans for the City".

Who will be involved?

7.3 Government Regulations require the Council to meet a minimum level of public consultation and specify a number of organisations, which must be consulted if the Council considers that they will be affected (please refer to Table 1 in Appendix A).

7.4 Consistent with long established practice, the Council wishes to go further in proactively involving local communities. The Council recognises there are various ways in which views can be sought and whereby people can participate in the planning process.

Who will we engage with?

7.5 For all Local Development Framework documents we will be consulting and working with the following networks and forums:

- The Coventry Partnership
- The Community Empowerment Network
- Coventry By Design Forum
- Development Forum
- Forum for Constructing Excellence (FORCE)
- Residents Liaison Forum

7.6 It should be clearly recognised that in addition to the groups and organisations listed in Appendix A, all other partners that are included on our database will also be initially consulted as a matter of course for each Local Development Framework document. At present, this consists of over 350 groups, organisations and private individuals. This will be in addition to legal requirements to consult certain organisations such as government agencies and other organisations (see Table 1 in Appendix A).

How will the community and stakeholders be involved?

7.7 Many communities and stakeholders are already working with the Council on a wide range of issues and projects. These networks also have considerable expertise and experience of working on an extensive range of planning issues. Therefore, a strong basis of working in partnership already exists which can be used as a foundation for greater involvement in planning over time.

7.8 It is vital to make the best use of both the Council's, the communities' and stakeholders' time and resources by developing integrated and agreed approaches to working together. Figure 2 sets out our basic commitments for involvement throughout the plan preparation process.

7.9 The Council does not want to be prescriptive about the type of consultation tools and techniques that can be used in respect of each Development Plan Document. It would be wrong to promise something that could not be delivered as circumstances, needs and priorities can change over the course of the next 3 years during plan preparation. We will learn through further experience and no doubt develop new consultation tools and techniques. Any consultation or participation event will be tailored to the type of Local Development Framework document by drawing upon the list in Table 1.

7.10 We will work collectively and constructively with all partners and by using evidence from experience, to decide the most suitable approach. Table 1 sets a 'menu' of possible approaches that may be used to help achieve meaningful and continuous community involvement. It should be recognised that different methods of community involvement will be more or less appropriate depending on:

- The type of Local Development Document being prepared.
- The particular stage in the preparation process.

Our pledge:

"We will tailor our approach to community involvement on all Local Development Framework documents by agreeing appropriate methods during each stage of preparation"

How will plans be prepared?

7.11 Figure 2 shows the main stages involved when preparing a plan, which is informed through an evidenced based consideration known as a Sustainability Appraisal, which will also incorporate the requirements of the EU Strategic Environmental Assessment Directive.

7.12 Now that Statement of Community Involvement has been adopted, we will need to ensure that all documents and plans are prepared in accordance with its requirements. When we prepare each Development Plan Document for submission to the Secretary of State, the Regulations require that we also submit a Statement of Compliance. This will set out in detail how we have sought to meet our community involvement obligations outlined in the adopted Statement of Community Involvement.

7.13 The Inspector, when testing the soundness of the Development Plan Document at Examination, will use the Statement of Compliance to determine whether the Statement of Community Involvement has been correctly followed. If there has been a failure to comply with the Statement of Community Involvement or the Regulations, in a way that undermines the Development Plan Document, the Inspector can recommend that the plan be withdrawn. [For a detailed breakdown of the role of each plan, please refer to the Council's LDF work programme using the following website:](#)

www.coventry.gov.uk/info/1004/planning_policy/292/local_development_scheme

Supplementary Planning Documents (SPD)

7.14 The proactive engagement of communities through policy development can also be achieved through the preparation of Supplementary Planning Documents. These are produced to expand on policy and provide additional information and guidance in support of policies and proposals in Plans. They can be site specific or topic based. The process for preparing a Supplementary Planning Document is similar to that for a Plan, but simplified. Supplementary Planning Documents are not subject to independent examination. Figure 3 sets out the preparation process, which is informed by community involvement and a full Sustainability Appraisal. Details of the Supplementary Planning Documents the Council intends to prepare are set out in the approved Local Development Scheme (LDS).

7.15 The Council is committed to making communities aware of the potential of Supplementary Planning Documents (SPD) as proactive planning tools. SPD cannot be used to introduce new development proposals or allocations, but they can show how the proposals contained in Development Plan Documents will be articulated and related on the ground.

How will the Council publicise the plans and documents?

7.16 Methods will include the following: (further details of some of these are referred to in Appendix B).

- Area Forums
- The Council's website and electronic means of communication
- Local libraries and other community facilities
- Local newspapers and other media
- Parish Council meetings
- Statutory notices
- The City Council offices
- The Council's Magazine 'Citivision'

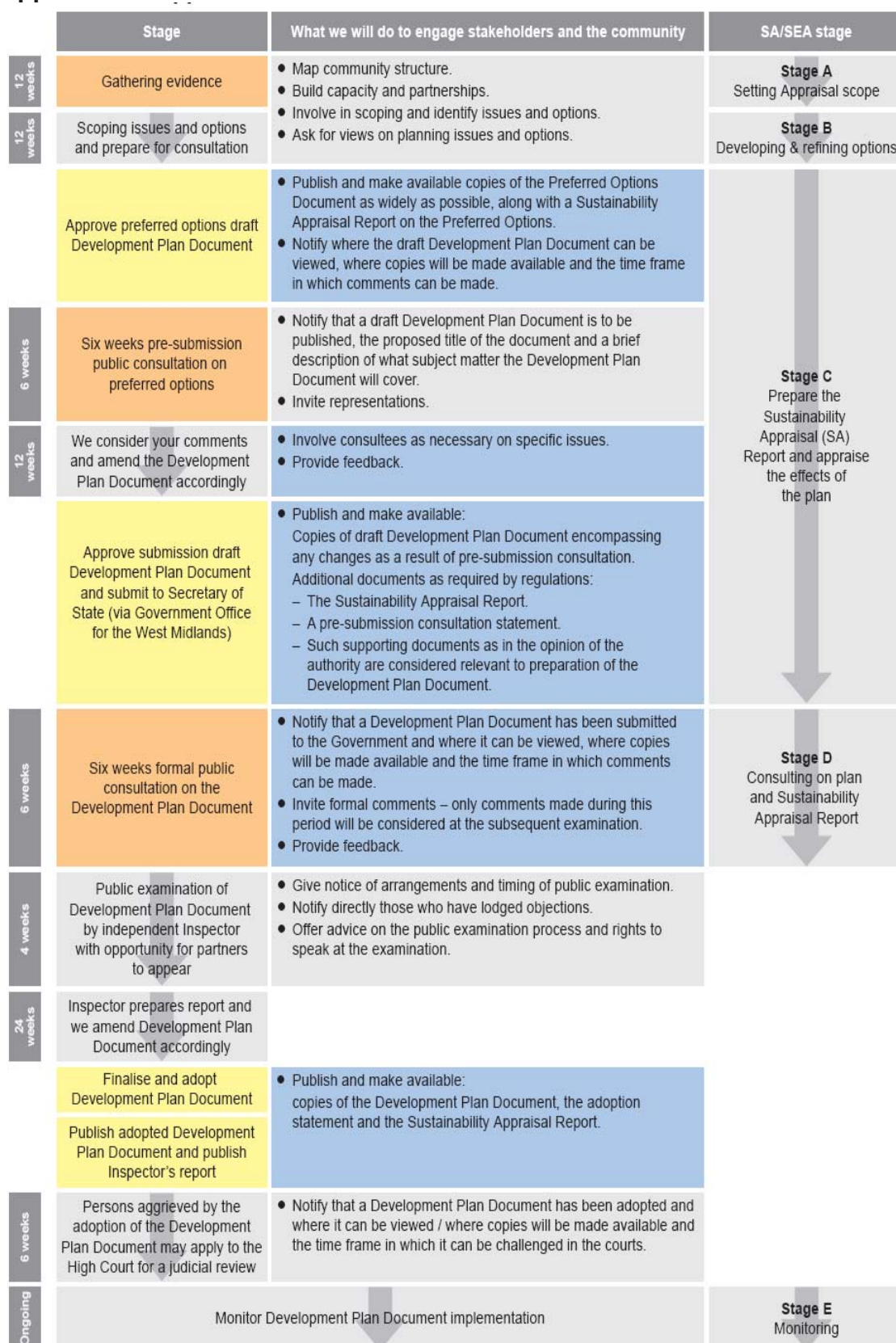
How will feedback work?

7.17 It is essential at each stage that there is a clear statement as to what has been done, what issues have arisen and how these have been considered and influenced the decision making process up to that point. This must then be communicated to those who have been involved. It will not usually be possible for everybody's views to be taken on board fully, but all participants must be sure that their voices have been heard and opinions actively considered.

7.18 Feedback will take place after any consultation exercise and within an agreed timescale. During each public consultation exercise, a schedule of representations will be prepared, which will record written comments and the impact they had on the final document. This will be available for inspection on the website and at the Planning Advisory Desk.

7.19 Committee reports will identify issues arising and those persons who have made representations will be advised of the date of any formal consideration will, subject to a protocol, be permitted to speak at any formal decision making forum. Once a decision has been made, any person who made representations will be advised in writing of the outcome. The Council's magazine "Citivision" will continue to be used to give feedback and communicate information, including the results/outcomes of consultation and participation events and news to the wider community.

Figure 2: Development Plan Document Preparation Process and our Approach to Involvement



An additional period of six weeks consultation is allowed after submission but before the examination in the event of site allocation representations being made.



Figure 3: Supplementary Planning Document Preparation Process and Our Approach to Involvement

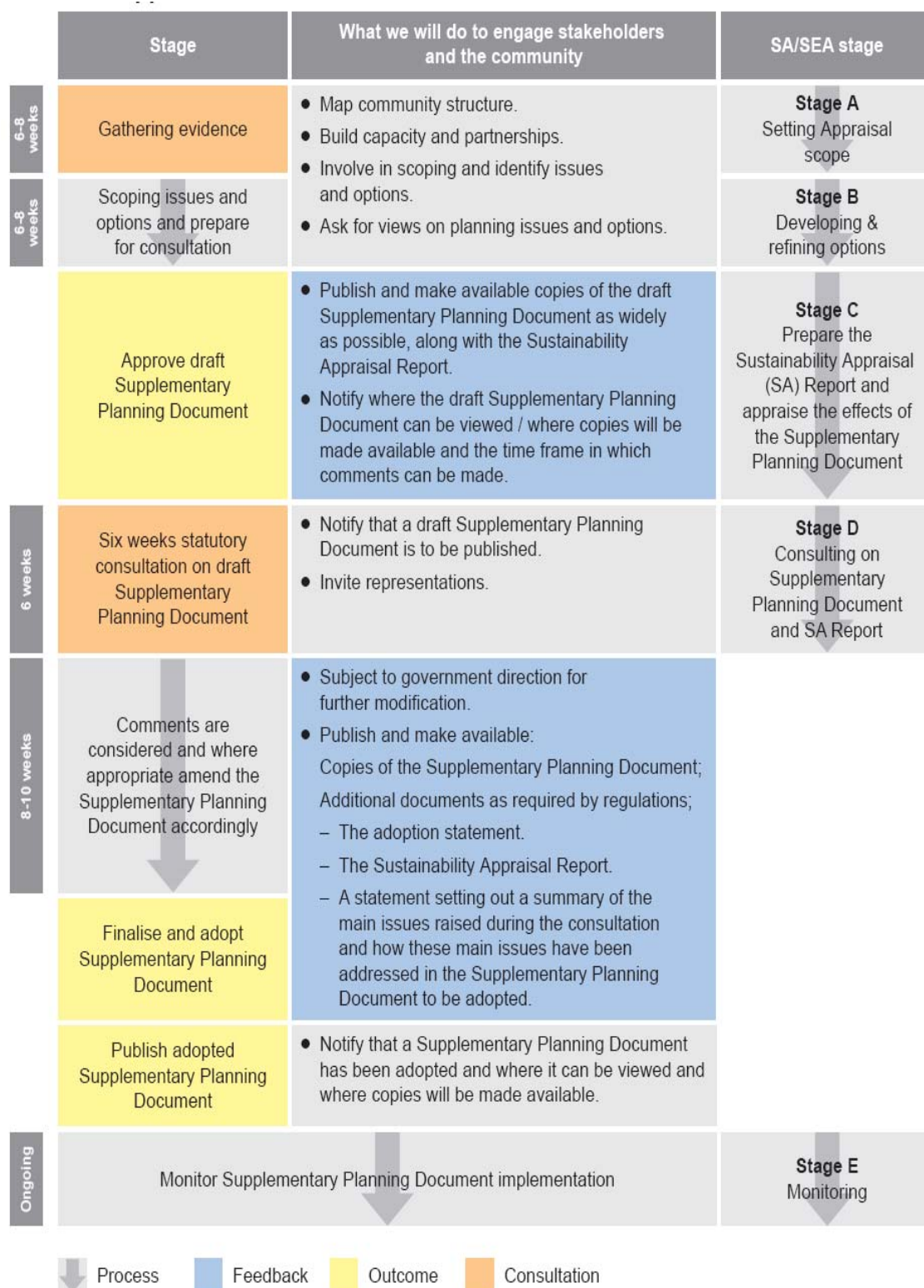


Table 1: Community Involvement Methods and Techniques

Method/Technique	Stage Appropriate			Description	Evidence Base
	Issues & Options	Preferred Options	Submission		
Exhibitions/roadshows/ open days	✓	✓		Effective means of providing information to the wider community and inviting views in an informal way.	6% of SCI questionnaire respondents considered this to be a useful means of involvement.
Questionnaires/surveys	✓	✓		Can enable detailed and focused consultation around a series of worded questions.	
Letter, email and website	✓	✓	✓	All consultation documents will be published on the Council's website. Responses can be submitted via downloading documents.	38% of SCI questionnaire respondents considered email to be a useful method of communication but 62% still preferred written letter.
Media and publicity	✓	✓	✓	Local newspapers will be used to advertise publication of plans/ documents and meetings. Use will also be made through the Council's own magazine 'Citivision'. Radio and television may also be willing to assist. Statutory Notices will be used to invite comments during the preparation of plans.	9% of SCI questionnaire respondents considered 'Citivision' to be a useful means of informing.
Planning workshops	✓	✓		Discussion based event to present and gather information usually focused around a series of topics or issues.	12% of SCI questionnaire respondents considered community workshops to be a useful means of involvement.
Master Planning and Planning for Real	✓	✓		Covers issues such as potential layout, design and incorporates the communities' requirements. Useful techniques in master planning an area can include 'Enquiry By Design' and 'Planning for Real'.	Proven successes through working examples in the city, which include the Swanswell Initiative and Stoke Aldermoor Regeneration projects.
Steering groups, networks and forums	✓	✓	✓	Mechanism for focusing and engaging in the production of all plans and documents.	A LDF Corporate Working Group has been established with officers from each Directorate of the Council. Other LDF Task and Finish Groups have been set up with CEN and The Coventry Partnership.
Visioning events and stakeholder meetings	✓	✓		Individual meetings with partners and stakeholders. Can obtain in-depth comments regarding documents and/ or plans and useful in understanding and addressing outstanding issues.	Successful meetings held with key stakeholders during preparation of the SCI.

Table 2: How we will involve you in our plans

<u>Stage</u>	<u>Groups</u>	<u>Consultation Techniques</u>
<u>Issues and options</u>	<u>All Groups on LDF database</u> <u>All other groups</u> <u>All residents</u>	<u>Press Releases, advertisements in newspapers.</u> <u>Making documents available on website, at libraries and Council offices.</u> <u>Use of email wherever possible rather than post. Documents can be made available in other formats and languages on request. Exhibitions in Community Areas based on demand.</u>
	<u>Residents Associations</u>	<u>Invitation to attend exhibition</u>
	<u>Businesses</u>	<u>Briefings and short focus groups on specific issues such as transport, economic development, sustainable communities, environment</u> <u>Use of Business forum meetings.</u>
	<u>Local Environmental/Other Interest Groups</u>	<u>Focus group on above issues</u>
	<u>Coventry Partnership</u>	
	<u>All residents</u>	<u>Open Evenings / exhibitions / Ward Forums.</u>
	<u>Older people</u>	<u>Information at residential homes for older people, Post Office, Doctors Surgeries</u>
	<u>Young people</u>	<u>Publicity information sent to schools, with invitation to be involved in process</u>
	<u>Black and Minority Ethnic Groups</u>	<u>Peer Consultation</u> <u>Discussion groups with established BME groups and forums</u>
	<u>Disabled Groups</u>	<u>Presentation on request</u>
<u>Lesbian, Gay, Bisexual and Transgender Groups</u>	<u>Discussion forums / focus groups using links through existing equality and diversity forum</u>	
<u>Submission Draft</u>	<u>All Groups on LDF database</u> <u>All other groups</u> <u>All residents</u>	<u>Press Releases, advertisements in newspapers.</u> <u>Making documents available on website, at libraries and Council offices.</u> <u>Use of email wherever possible rather than post. Documents can be made available in other formats and languages on request. Exhibitions in Community Areas based on demand.</u>
	<u>Residents Associations</u>	<u>Invitation to attend exhibition</u>
	<u>Business</u>	<u>Breakfast briefings with exhibitions of proposals – or use of Business forum meetings</u>
	<u>Local Environmental/Other Interest Groups</u>	<u>As with all groups</u>

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	<u>Coventry Partnership</u>	<u>Presentations on request, Circulation of materials</u>
	<u>All residents</u>	<u>Open Evenings / exhibitions / Ward Forums.</u>
	<u>Older people</u>	<u>Information at residential homes for older people, Post Office, Doctors Surgeries</u>
	<u>Young people</u>	<u>Discussions with Schools and Coventry Youth Council and Young Peoples Parliament</u>
	<u>Black and Minority Ethnic Groups</u>	<u>Peer Consultation Discussion groups with established BME groups and forums</u>
	<u>Disabled Groups</u>	<u>Presentation on request</u>
	<u>Lesbian, Gay, Bisexual and Transgender Groups</u>	<u>Presentation on request</u>

8.0 Community Involvement In Planning Applications

8.1 This section clearly sets out our practice for community engagement and involvement for all planning applications.

8.2 Almost every planning proposal has an impact on somebody. There are, however, proposals, which will generate more community interest and involvement than others, particularly those that are likely to be 'controversial'. These are mainly:

- Large scale applications (more than 10 dwellings, 1,000 square metres of floor space or a site of more than 0.5 hectares).
- Applications that are not in line with policies contained in the Development Plan/Local Development Documents.
- Proposed developments where there would be significant environmental impact and/or significant transport implications.
- Other applications where community involvement may be important. For example, where employment land or green space may be lost.
- Proposals where there is a potential impact on adjoining Conservation Areas or listed buildings.
- Those applications that generate local concerns, e.g. food and drink uses.

8.3 For the purpose of this Statement of Community Involvement, the description of proposals above will be considered as significant applications. [Good practice in carrying out consultation for major planning applications can be found at the following website: www.planningportal.gov.uk/planning/applications/](http://www.planningportal.gov.uk/planning/applications/)

Pre-application Consultation

8.4 Pre-application consultation is actively encouraged in all cases at the earliest possible opportunity. Community consultation works best if it is carried out at the point when proposals are being formulated. By 'front loading' the process, the community is able to participate in identifying issues and debating options from the onset, thus having the potential to make a real difference to the design of the proposal subsequently submitted.

8.5 Potential applicants will be encouraged and supported to undertake pre-application consultation through the following measures:

- The benefits of pre-application consultation will be strongly featured on the website and in advice literature
- Developers and other applicants approaching the Council at an early stage will be encouraged to undertake early consultation. Officers will point out that the benefits of early consultation nearly always out-weigh any benefits of confidentiality.
- Advice and information will be given on how to carry out community consultation, including advice on techniques, lists of community organisations and venues, contact details of city-wide organisations who could help and lists of experienced consultants.
- Developers will be allowed to lodge drawings with the Planning Advice Desk and

to have them placed on the website, and to have their proposals publicised and provide their contact details.

- In considering planning applications, the requirements of the SCI will be followed.

Information on the Planning Process

8.6 Information on the planning process, how to make applications and representation on applications is made available through leaflets, the Planning Advisory Desk in Civic Centre 4 and through the Council's website:

www.coventry.gov.uk

Information on Planning Applications

8.7 Information on planning applications is made available through the following measures:

- All properties that adjoin the boundaries of an application site are sent a letter notifying them of receipt of any application and giving them opportunity to view the proposals and make any representations. At the discretion of the case officer, the dispatch of notification letters can be widened and a site notice may also be displayed in the immediate vicinity of the application site.
- Case Officers may decide to display site notices in a local area advising of specific proposals.
- All local residents and interest groups are provided with a weekly list of applications received so that they may consider whether they wish to submit a representation either for or against proposals.
- As required by regulations, certain major planning applications and those affecting a Conservation Area or the setting of a listed building, are advertised in the local newspaper (Coventry Evening Telegraph) and site notices are also displayed.
- Weekly lists of all applications made and received by the Council are circulated to the local newspaper (the Coventry Evening Telegraph).
- Copies of the weekly lists are also sent to Councillors, Parish Councils and other groups who request them via the Bulletin.
- The weekly list is also available on our website at:

<http://planning.coventry.gov.uk/portal/servlets/WeeklyListServlet>

8.8 Plans, drawings and other application documents are available for the public to view at the Council's offices at Civic Centre 4 during regular office hours. A late night opening is provided once a week. Proposals can also be inspected and commented upon through the Council's web site.

<http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet>

8.9 Whilst the statutory requirement is that only certain types of development should receive full publicity, the Council wishes to ensure that maximum publicity is given to all proposals. Table 2 details our basic commitments. Appendix D provides a greater level of detail as to the other methods of information and consultation that could be deployed, where appropriate in addition to our basic commitments.

8.10 In considering the application of any conditions to planning approvals, including section 106 agreements, the Council will consider any published neighbourhood plans and liaise with the appropriate Area Forums to ascertain whether any pre-

existing objectives can be met within the scope of planning law. Proposals for section 106 agreements shall be published before any planning application is determined and organisations representing local residents and other interest groups will be consulted.

Representations on Planning Applications

8.11 The normal period for representations on planning applications, once registered, is 21 days. (However, bodies such as English Nature will be allowed a longer period of time to comment on applications where this is prescribed by legislation). Bearing in mind the requirements as regards determination of applications within specified periods, every opportunity will be taken to encourage pre-application consideration. For more significant planning applications identified in 8.2, a period of time will be allowed for comment.

8.12 Representations are required to be made in writing by letter, fax, email or via the website. The Council is committed to e-government and all representations received will be placed on the website usually within five working days.

8.13 All respondents should also be told when there is a significant change to the application and given the opportunity to comment further if necessary, that may address their initial representation. The Council is presently trialling a scheme whereby all respondents will be notified when the application is going to committee. The present Public Speaking provisions (see Appendix C) will continue to be operated and periodically reviewed.

Feedback

8.14 All respondents will be informed of the decisions in respect of planning applications and the reasons if the application has been refused and any conditions imposed on any grant of permission. Reports to Planning Committee will continue to summarise those comments received and the issues will be addressed.

Determining Planning Applications

8.15 Once a proposal is formally submitted there are prescribed time limits within which it is expected that a decision will be made. There are two elements to this:

- Eight weeks for all planning applications
- Thirteen weeks for major planning applications

Our pledge:

“The Council is committed to the principles of consultation with the community on planning applications and will continue to go significantly further than the legal requirements to fully involve the community in all appropriate circumstances but will also expect to meet the Government’s guidelines in respect of the speed of decision making.”

Table 3: Methods of Community Involvement, Consultation and Publicity

Stages of Application	Methods of Publicity, Consultation and Involvement									
	Weekly List	Web Site	Neighbour Notification*	Site Notice	Statutory Newspaper Advert	Exhibition of Plans	Press Release	Public Meetings	Development Forum	Planning Advisory Desk and Liaison Officer
All Planning Applications										
Pre-application (we recommend)										
Application	✓	✓	✓							✓
Post application		✓	✓							✓
Appeal		✓	✓	✓	✓					✓
Significant Planning Applications										
Pre-application (recommended methods to be undertaken by prospective developers / applicants)		✓		✓		✓	✓		✓	✓
Application	✓	✓	✓		✓			✓		✓
Post Application		✓	✓							✓
Appeal		✓	✓	✓	✓		✓			✓

* To notify neighbouring properties immediately adjoining the application site.

Consultation requirements related to the Planning Act 2008 and National Policy Statements

8.16 The 2008 Planning Act outlines consultation requirements for nationally significant infrastructure developments. In preparing planning applications, it should be noted that the following requirements must be addressed:

- an applicant must engage in pre-application consultation with local communities, local authorities and those who would be directly affected by the proposals.

- The applicant must draw up a Statement of Community Consultation which describes how he proposes to consult the community and submit it to the local authority for their comments. Once the applicant has finalised the statement it must be published in a local newspaper and the consultation must then take place.
- The applicant must also consult the relevant statutory consultees and technical consultees as set out in the regulations.
- Following the consultation process the applicant must prepare a consultation report explaining what consultation was undertaken, summarise what responses were received and what was done in response including any changes made to the project and submit the report to the Infrastructure Planning Committee.

8.17 Planning Performance Agreements (PPAs) were formally introduced into the planning system on 6 April 2008 and are about improving the quality of planning applications and the decision making process through collaboration. They bring together the Local Planning Authority (LPA), developer and key stakeholders, preferably at an early stage, to work together in partnership throughout the planning process. They are essentially a collaborative project management process and tool that provide greater certainty and transparency to the development of scheme proposals, the planning application assessment and decision making. For additional support, please use the following website:

www.atlasplanning.com/page/ppa.cfm

Pre-application consultation with the Council

8.18 Pre-application discussions with developers for major applications with the City Council is recommended. A successful example of this approach can be shown in the Coventry Belgrade Plaza scheme which required early discussions with the developer to identify all relevant planning issues before a formal planning application was submitted. These early discussions helped the scheme progress smoothly during the formal planning application process and resulted in a mutually beneficial outcome, both in terms of the time period for determination and resources allocated for obtaining approval.

8.19 The intention of the City Council is to provide more vigorous early consultation requirements (frontloading), in relation to major planning applications so that the opportunity for stakeholders to influence proposals will be maximised and in turn ensure they are in the wider public interest.

What is a major application?

- the creation of at least 10 residential units; or residential development on a site of 0.5 hectares or more;
- non-residential development on a site of 1 hectare or more;

- the creation or change of use of 1000 square metres or more of gross floor space (does not include housing).

8.20 The Council has set out the following tiered approach to provide guidance to applicants on which major applications may be subject to wider community involvement, with the level of engagement expected to be appropriate to the scale and nature of the proposal.

8.21 Therefore, for very large or controversial applications, as described in Tier Level 1 below, the Council will encourage developers to carry out an extensive consultation exercise with the public. A more limited pre-submission consultation is suggested for applications that fall in Tier level 2, as these are likely to be smaller proposals, but may be locally contentious.

Tier Level 1

- Major Development Plan Departures – major applications proposing significant departure from the Coventry Development Plan 2001;
- Developments requiring Environmental Impact Assessment which are accompanied by an Environmental Statement;
- Proposals subject to Direction by the Secretary of State Applications that require a Full Transport Assessment to reflect the scale of development and the extent of transport implications of the proposal;

Tier Level 2

- Proposals that are likely to be locally contentious or generate significant local concern following the submission of an application;
- Applications that fall within sites that are sensitive to development pressures, including Conservation areas, listed buildings.

8.22 It is important to recognise that the level of consultation for each individual proposal will be deemed appropriate through discussions carried out with the Council and the applicants, and may not always follow the tiered approach set out for guidance above. The responsibility for pre-submission consultation will remain with the applicants and their agents. Although the Council will ensure that appropriate consultation takes place our role will be on the form of consultation expected, this advice will be without prejudice to the outcome of the proposal.

Table 4 Possible consultation techniques on major planning applications

<u>Consultation approach</u>	<u>Tier Level 1</u>	<u>Tier Level 2</u>
<u>Public meetings - on larger and more controversial schemes, a wider audience can debate and discuss proposals</u>	<u>✓</u>	
<u>Public exhibition - on larger schemes, exhibitions held locally to the proposal can provide information and raise interest</u>	<u>✓</u>	<u>✓</u>
<u>Development Briefs - on larger schemes. Development Briefs prepared by the applicant and subject to consultation provide an opportunity to involve the public at an early stage in the principles of a proposal</u>	<u>✓</u>	
<u>Workshops - on larger schemes, allows stakeholders and community groups to discuss in detail particular issues at an early stage of a development proposal</u>	<u>✓</u>	
<u>Enquiry by Design - Intensive workshop exercise with stakeholders appropriate for very large sites with a complex series of issues that need subtle testing and examination to achieve the optimum design solution.</u>	<u>✓</u>	
<u>Planning for Real - uses simple models as a focus for people to put forward and prioritise ideas on how their area can be improved.</u>	<u>✓</u>	<u>✓</u>
<u>Parish Councils - important way of raising interest locally and provides access to a network of local community groups.</u>	<u>✓</u>	<u>✓</u>
<u>Media - Radio and local press can enable a wide audience to be reached. Documents and processes can be explained in simple, appropriate language</u>	<u>✓</u>	<u>✓</u>
<u>Website - all relevant documents can be provided online through dedicated web pages facilitated through the Council or applicant, keeping residents informed of consultation events</u>	<u>✓</u>	<u>✓</u>

9.0 Review of the Statement of Community Involvement

9.1 There will be a full evaluation and review of the Statement of Community Involvement 18 months after adoption to assess whether the methods and techniques are proving successful. This will be evidenced through the findings of the Annual Monitoring Report and through the partnership working arrangements of the proposed Statement of Community Involvement Review Group under the auspices of the Coventry Partnership.

9.2 There are some sections in the Statement of Community Involvement which will require particular monitoring, especially those areas where work to establish new groups or getting target groups involved in the planning process has only just started.

9.3 To ensure effectiveness we will focus on the following key questions:

- How have the views of the community and other stakeholders' influenced documents and the planning of developments.
- How well have we involved those who are sometimes excluded from the planning process.
- How satisfied have partners been with the processes used even if they oppose the final decisions.

Appendix A: Stakeholders and Partners

The organisations that the regulations require the Council to consult are set out in Table 1 below, they will be consulted throughout the preparation of the Local Development Framework Documents. The Council is only required to consult those organisations marked with an asterisk in respect of the Statement of Community Involvement, but has gone beyond the statutory requirements in progressing to this adopted version. Please note, the list of bodies in this Appendix is not exhaustive and also relates to successor bodies where re-organisations occur.

Table 1: Specific Consultees

Adjoining Local Authorities including Parish Councils*
Advantage West Midlands (RDA)
Countryside Agency
The Coventry Partnership (LSP)
Electricity and Gas Companies
English Heritage
English Nature
Environment Agency
Government Office for the West Midlands (GOWM)
Highways Agency*
Historic Buildings and Monuments Commission for England
Severn Trent Water Ltd
Strategic Health Authority
Strategic Rail Authority
Telecommunications companies
West Midlands Regional Assembly (Regional Planning Body)*

[Homes and Community Agency](#)

Single Consultee Database

There are many other groups and organisations which are set out in Table 2. This sets out a list of 'standard' national, regional and local consultees (based on Annex E in PPS12) for Local Development Framework purposes. It is by no means exhaustive

and it does not include a 'long list' of the types of groups the Council proposes to consult as this could change too quickly.

The full list of consultees is held and controlled through a database, which is updated on a regular basis by the Council. Any group, organisation or individual who wants to get involved can request their details be added to or taken off the database, or amended by contacting City [Services and](#) Development Directorate on telephone (024) 7683 1219 or by email: ldf@coventry.gov.uk

This database will also be used for notifications of planning applications.

Table 2: National, Regional and Local Groups, Departments, Bodies and Organisations

Age Concern	English Partnerships	National Farmers Union
Allesley and Coundon Wedge Conservation Society	Equal Opportunities Commission	National Playing Fields Association
Arts Council West Midlands	Forestry Commission	National Trust
British Geological Survey	Friends of the Earth (Coventry)	Network Rail
British Horse Society	Government Office for the West Midlands (GOWM)	Older Peoples Information Network
British Transport Police	Groundwork, Coventry and Warwickshire	Police architectural liaison officers/ crime prevention design advisors
British Waterways, canal owners and navigation authorities	Gypsy Council	Ramblers Association
Centro	Health and Safety Executive	Royal British Legion, Coventry Branch
Civil Aviation Authority	Help the Aged	RSPB
Commission for Architecture and the Built Environment (CABE)	HM Prison Service	Schools Council
Commission for Racial Equality	Home Builders Federation (HBF)	Severn Trent Water Ltd
Country Landowners Association (CLA)	Housing Corporation	Sport England West Midlands
Countryside Agency	Learning and Skills Council	Telecommunications Companies
Coventry Airport Operators (Air Atlantique and Thompson Fly)	Local Amenity Groups	The Chamber
Coventry Council for Disabled	Local Business Groups	Tourism West Midlands
Coventry Health Authority (Primary Care)	Local Community Action Groups	University of Warwick
Coventry Partnership	Local Community Transport Groups	Warwickshire Wildlife Trust
Coventry Society	Local Leisure and Sports Group	Warwickshire, Solihull and Coventry Local Access Forum
Coventry University	Local Registered Social Landlords (RSLs)	West Midlands Fire Service
Coventry Way Association	Local Religious and Faith Groups	West Midlands Planning Aid Service
Coventry Youth Council	Local Residents Associations	West Midlands Police
CPRE (West Midlands Region)	Midlands Architecture and the Designed Environment (MADE)	West Midlands Travel
Culture West Midlands	Museums, Libraries and Archives West Midlands	West Midlands Water Board
Department of the Environment, Food and Rural Affairs (DEFRA)	Ministry of Defence	Whitefriars Housing Group
English Heritage	National Care Standards Commission	

Appendix B: Further Information and Publicity

Local Libraries

All community libraries in Coventry are listed below and have a range of computer terminals all with Internet access.

- Aldermoor Farm Community Library
- Arena Park Library
- Bell Green Library and Learning Centre
- Canley Community Library
- Central Library
- Cheylesmore Community Library
- Coundon Community Library
- Earlsdon Community Library
- Finham Community Library
- Foleshill Community Library
- Hillfields Community Library
- Jubilee Crescent Community Library
- Stoke Community Library
- Tile Hill Community Library
- Whoberley Community Library
- Willenhall Community Library
- Wyken Community Library

Coventry City Council Website

The Council's website is one of the primary methods of providing information and updates throughout the process. It will include an e-mail facility for asking questions about the various Local Development Framework documents and plans. The main advantage is that it allows information to be accessed at any time, and is not limited to normal office hours. ~~It will contribute to the Government's aim of ensuring that all government services are available electronically by 2005.~~ The website can be accessed at:

www.coventry.gov.uk/ldf

More detailed information relating to our planning pages can be accessed at:

www.coventry.gov.uk/info/200074/planning

Local Newspapers and Other Media

The Council will, in accordance with the Regulations, advertise in at least one local newspaper. Details will include when and where plans and documents can be

inspected, how copies can be obtained, the closing date for representations and where to send them. Press releases will also be issued to local newspapers and other media. The Council will also inform the community through regular notices and articles in the local newspaper Coventry Evening Telegraph and the Council's magazine Citivision which is sent to every household in the city.

Appendix C: Code of Practice for Public Speaking at Planning Committee

Part 5.5 – Code of Good Planning Practice for Members and Employees Dealing with Planning Matters

Coventry City Council Constitution

Release 5 – July 2005 241 Appendix 1

A Guide to Public Speaking at the Planning Committee

1. Introduction

The Council operates a scheme for public speaking at its Planning Committee. You have registered as wishing to speak on a planning application to be decided by the Committee. That application is now ready to be considered by the Committee and this leaflet explains how you can take part before the Committee makes a decision.

2. The date, time and place of the Committee meeting

With this leaflet is a letter, which gives the date, time and place for the Planning Committee's meeting. Also there should be a copy of the written report on the application which will be before the Committee.

3. Do I have to speak?

No. Even though you've registered to speak this doesn't mean that you have to if you've changed your mind. If the application details have changed or the written report adequately summarises your views then you can choose not to speak. If you no longer want to speak, please telephone the direct line number on the enclosed letter to confirm this. Please have the letter to hand as we may need some details from it when you call. If you know that others have registered to speak and they share your views, you may want to choose one of your number to speak for you all. You can request that an Elected Member speaks on your behalf. You can find out who your local Elected Members are by 'phoning the Council on (024) 7683 3156 If you still want to speak this is what will happen at the meeting.

4. What will happen at Planning Committee?

- When the application is called, the Planning Officer will present the written report and refer to plans and photographs, which will be on display.
- Objectors to the application will then be called to speak.
- Supporters of the application will then be called to speak.
- The applicant (or their representative) will be called to speak.
- Members of the Committee will then consider the application and then vote.
- Officers may need to answer questions, respond and clarify points raised and advise the Committee on procedure.

5. Rules you should know about

All objectors, supporters and applicants (or their representative) who choose to speak will be bound by the following rules:

- You may only speak once and for a maximum of up to 3 minutes only. Please make all your points in the one 'go' - you won't be allowed a second chance. Where more than one objector has spoken, the applicant or their representative may, at the Chair's discretion, be allowed longer than 3 minutes to speak to respond to the points raised by objectors.
- Objectors, supporters and applicant (or their representative) will always speak in that order. Second and subsequent speakers will be expected to raise new issues.
- The Chair of the Committee will rule on any dispute as to the procedure to be followed and the ruling will be final. The Chair has the right to intervene and curtail public speaking to ensure orderly conduct and avoid repetition.
- You may only speak on 'planning matters'.

Planning matters include:

- Compliance with the development plan
- Design and use of the proposal in its surroundings
- The effect of sunlight and daylight on adjoining properties
- Loss of privacy to adjoining properties
- Effect on parking, traffic and road safety
- Noise and general disturbance to adjoining properties

Planning matters do not include:

- Spoiling your view
- Rights to light
- Devaluing your property
- Covenants affecting properties
- Nuisance caused by building work
- Land ownership disputes
- Personal character of the applicant
- Moral issues

Appendix D: Consultation Methods for Planning Applications

Table 3: Methods & Resource Implications

Method	Benefits	Resource Implications	Stage Appropriate	How Applied?
Information				
Public notices on sites	<ul style="list-style-type: none"> In theory can reach a wide audience. Is most likely to be seen by regular users so targets the groups most likely affected by proposals. 	<ul style="list-style-type: none"> Cost of each notice is minimal. 	<ul style="list-style-type: none"> Application stage. 	<ul style="list-style-type: none"> Notices are often used in conjunction with press advertisement or neighbour notification.
Newspaper notices	<ul style="list-style-type: none"> Can inform large numbers of people relatively easily. Generates public debate. 	<ul style="list-style-type: none"> Cost of advert is expensive. 	<ul style="list-style-type: none"> Application stage 	<ul style="list-style-type: none"> Public Notices relating to applications appear in the local weekly press.
Press releases	<ul style="list-style-type: none"> Can provide wide publicity of proposals. 	<ul style="list-style-type: none"> Minimal costs, if any. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> Statement issued to the media to seek to engage the wider public.
TV and radio interviews	<ul style="list-style-type: none"> The opportunities offered by such technology can make participation easier. 	<ul style="list-style-type: none"> Minimal costs, if any. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> Can be used to inform the community of key issues and consultations and to obtain views/comments or to inform of decisions. Tends to be the more controversial proposals that attract media attention.
Citivision (Council quarterly magazine)	<ul style="list-style-type: none"> Reaches all households and the Council has editorial control. 	<ul style="list-style-type: none"> Minimal if part of the existing publishing schedule. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> The timescales are such that rarely opportunity to use as part of application process.
Displays at libraries, planning advisory desk/ Council offices	<ul style="list-style-type: none"> Gives flexible terms of attendance so can be inclusive. Provides useful information, can inform debate and can be left un-staffed. 	<ul style="list-style-type: none"> Minimal if application documentation and development plan policy made available. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> Provides more local venue for information either in paper copy or via web and where hours of opening generally greater than at civic offices.

Coventry Statement of Community Involvement
Revised - September 2011

Method	Benefits	Resource Implications	Stage Appropriate	How Applied?
Consultation				
Public Meetings and Exhibitions	<ul style="list-style-type: none"> • Pre-consultation taking place in a genuine manner. • Process undertaken either independently from the developer or jointly. • Early opportunity for the community to comment on evolving proposals prior to submission. 	<ul style="list-style-type: none"> • Can be a resource issue depending on the number and duration of meetings/ exhibitions. 	<ul style="list-style-type: none"> • Pre-application, application and post application. 	<ul style="list-style-type: none"> • In most cases, a public meeting or exhibition will be encouraged on major proposals prior to consideration by the Development Forum. • Meetings may be arranged following formal submission of an application where requested by local community or Elected Members.
Parish Council meetings	<ul style="list-style-type: none"> • Continuity of representation at grass roots level. • Cost effective and accountable to local electors. 	<ul style="list-style-type: none"> • Officers attend meetings when requested. 	<ul style="list-style-type: none"> • Pre-application and application stage. 	<ul style="list-style-type: none"> • In most cases, a City Council Officer presence at a Parish Council meeting will be required on the advice of the local community, elected Members and/or local planning authority.
Website	<ul style="list-style-type: none"> • Greater level of access and involvement for all members of the community. • People can choose to engage at their leisure and in the comfort of their surroundings. 	<ul style="list-style-type: none"> • Considerable resources have been allocated to maximise benefits of the website as a means of communication. 	<ul style="list-style-type: none"> • Pre-application, application and post application stage. 	<ul style="list-style-type: none"> • The development and use of the Council's website in engaging the local community can be used throughout the process to help communication, participation and provide information.
Open days/road shows	<ul style="list-style-type: none"> • Gives flexible terms of attendance so can be inclusive. • Forum to listen as well as to inform. • Promotes good relations as direct contact with the public and decision makers. • Good way of reaching large numbers if well located. 	<ul style="list-style-type: none"> • Developer expected to fund. Officers in attendance as requested. 	<ul style="list-style-type: none"> • Pre-application stage. 	<ul style="list-style-type: none"> • One or more exhibition or display held in accessible locations where audiences can be informed of a development proposal. The aim is to take the information to the community using a range of media.

Appendix E: Glossary of Terms

Area Action Plans

These plans focus on areas that are subject to significant change and will benefit from having development plan status. They will be subject to Independent testing.

Annual Monitoring Report

A report, which assesses the implementation of the Local Development Scheme and the extent to which the policies are being achieved.

Core Strategy

The document, which will set out the vision, objectives and spatial planning strategy for the City.

Development Plan Document

One of a number of documents which is part of the development plan for the City and which are subject to independent testing.

Local Development Scheme

A programme of what is to be produced, the timescales and arrangements for production.

Local Development Framework

The portfolio of Local Development Documents, which constitute the spatial planning policies for the city.

Local Development Document

One of a number of documents which make up the Local Development Framework, including Development Plan Documents and Supplementary Planning Documents.

Regional Spatial Strategy

The strategic plan for the region, which has statutory status and will form the basis for preparing Local Development Documents

Statement of Community Involvement

A document, which sets out how stakeholders and communities will be involved in the process of producing Local Development Documents and planning applications. The Statement of Community Involvement will be subject to independent testing.

Supplementary Planning Document

A document, which elaborates on policies in Development Plan Documents and does not have development plan status. It requires community involvement in line with the Statement of Community Involvement or minimum regulations.

Sustainability Appraisal and Strategic Environmental Assessment

A document, which assesses the environmental social, and economic effects of the policies and proposals contained in Development Plan Documents and Supplementary Planning Documents.

If you need this information in another format or language
please contact us

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Council
Cabinet
Children, Young People, Learning and Leisure Scrutiny Board
(Scrutiny Board 2)

13 September, 2011
30 August, 2011
8 July, 2010

Name of Cabinet Member:

Cabinet Member (Education) – Councillor Kelly

Director Approving Submission of the report:

Director of Children, Learning and Young People and Director of City Services and Development

Ward(s) affected:

All

Title:

A Play Policy for Coventry

Is this a key decision?

No

Executive Summary:

On 20th October 2009 Cabinet approved the development of a corporate Play Policy with the support of Scrutiny Board 2. On 8th July 2010, Scrutiny Board 2 accepted the recommendation of the Play Policy review group on the content and structure of a Play Policy. This report is to present the final policy document for Cabinet and Council approval.

Recommendations:

The Cabinet is requested to:

- (1) That Cabinet recommend that the City Council approve the adoption of the attached draft Play Policy (Appendix 1) as Council Policy
- (2) That Cabinet recommend that the City Council agree that The Play Policy, once adopted, sits under the Core Strategy or equivalent
- (3) That Cabinet agree that the role of Play Champion is included in the portfolio of the Cabinet Member (Education), to be nominated on an annual basis at the Council AGM.
- (4) That Cabinet agree to delegate authority to the Director of City Services and Development (or whoever the Senior Officer should be) to draft an agreed form of wording for signs that

could be erected on land in housing developments at the start of the construction work that will be used to mark out space which has been allocated for play.

The Council is requested to:

- (1) Approve the adoption of the attached draft Play Policy (Appendix 1) as Council Policy
- (2) Agree that The Play Policy, once adopted, sits under the Core Strategy or equivalent

List of Appendices included:

Appendix 1. Play areas delivered through the Play Strategy – influencing the draft Policy

Appendix 2. Draft Play Policy

Appendix 3. Play Strategy Case Studies and recommendations

Appendix 4. Equality Impact Assessment

Other useful background papers:

- Cabinet Report 20th October 2009 – Development of a Corporate Play Policy and approval for Year 3 Playbuilder Sites
- Children, Young People, Learning and Leisure Scrutiny Board (2) 8th July 2010 – Developing a Corporate Play Policy

Both available from www.coventry.gov.uk/councilmeetings or from Room 60, Council House

Has it been or will it be considered by Scrutiny?

Yes-Children, Young People, Learning and Leisure Scrutiny Board (Scrutiny Board 2) – 8th July 2010

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

Yes -Play Strategy Board, Joint Commissioning Board of the Children and Young People's Strategic Partnership, Grounds Maintenance and Street Cleansing Partnership Working Group

Will this report go to Council?

Yes, 13th September 2011

Report title:

A Play Policy for Coventry

1. Context (or background)

1.1 Coventry was awarded nearly £2million from the Department for Children, Schools and Families (DCSF) Playbuilder and Big Lottery Play Programme to develop and improve 22 play areas in Coventry by March 2011. Appendix 1 shows the play areas that have been completed or are in the implementation stage.

1.2 Through the delivery of this programme, areas of work such as design, community engagement and risk management have developed and progressed to take into account national good practice and guidelines. Over the past three years there has been a lot of work developed nationally in terms of guidance and policy and good practice recommendations.

1.3 The work of the Play Strategy has been evaluated and four case studies have been identified, the recommendations of which have been fed into the development of the Play Strategy. (Appendix 3). The sites that have been used as case studies to learn from their implementation are:

- 1.3.1 Canley Brook
- 1.3.2 Parkwood Meadows
- 1.3.3 Primrose Hill Park
- 1.3.4 Sovereign Row

1.4 As recommended by Cabinet on 20th October 2009 the development of a corporate play policy became part of the work programme for Scrutiny Board 2. The content of the policy (Appendix 2) covers:

- Principles of play
- Practice
 - i. Community Engagement
 - ii. Design
 - iii. Risk Management
 - iv. Inspection and maintenance
 - v. Planning
- Partners
- Governance

Once the programme comes to an end, CLYP will cease to play a role in the development or refurbishment of play areas or in the co-ordination of services across the Council. The Play Policy is a means of embedding the good practice which has been developed and the policy decisions which have been taken over the last 3 years. It is important to identify how the policy will be monitored and evaluated. The current Play Champion, Cllr Lynette Kelly, has proposed that this be done through regular performance management reports to the Play Champion from City Services and Development, where the delivery services responsible for play areas and maintenance sit. It is therefore recommended that these arrangements are embedded into the portfolio responsibilities for a Cabinet Member, as the Play Champion, currently Cabinet Member (Education).

1.5 The draft Play Policy (Appendix 2) covers the first three recommendations from the report to Children, Young People, Learning and Leisure Scrutiny Board (2) 8th July 2010 – Developing a Corporate Play Policy

1.6 As part of the work with Scrutiny Board 2, members expressed concern that new housing development plans fail to identify and communicate information about play areas. They

stressed that it was important for everyone to know exactly what the land was earmarked for as this saved a lot of confusion/frustration later on. This may be done by way of erecting signs on site within new developments which clearly identified that the site was earmarked for a play area to ensure that prospective purchasers of new homes would be clear as to its location.

- 1.7 Scrutiny Board 2, as part of their task and finish group, recommended that officers draft an agreed form of wording for signs that could be erected on land in housing developments at the start of the construction work, that will be used to mark out space which has been allocated for play. The costs of this would be funded by the contractor.

2. Options considered and recommended proposal

2.1 Option 1: Not to accept the Play Policy as Council policy

- 2.2 This would mean that the learning and good practice from implementing the Play Strategy 'Something to do' would be lost. As there is now no longer a Play Strategy Manager there would be no framework under which to deliver any new play provision.

2.3 Option 2: Accept the Play Policy as Council policy

- 2.4 This would mean that the learning and good practice from the implementation of the Play Strategy 'Something to do' would be mainstreamed into practice and will continue to build upon the successful work developed over the last three years. The policy would be monitored by a Cabinet Member

- 2.5 The recommended option is Option 2

3. Results of consultation undertaken

- 3.1 The Play Policy has a section dedicated to community engagement, based upon the model that has been developed through the Play Strategy. The content of the Play Policy has been developed with the support of Scrutiny Board 2. Play professionals have been consulted and had an input into the policy through the North East Play Practitioners group. Children from Broad Heath Urban Explorers after-school club have been consulted on the content of the Play Strategy.

4. Timetable for implementing this decision

- 4.1 If the Play Policy is accepted then the content of the policy would be implemented whenever funding for the delivery of play areas became available.

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

There are no financial implications from this report.

5.2 Legal implications

There are no particular legal implications from this report.

6. Other implications

None.

- 6.1 **How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?**

The proposals contribute to the delivery of the Children's Plan, the Green Space strategy and the Sustainable Communities Strategy (SCS).

Citizens living longer, healthier, independent lives

SCS 2. Health, well-being and independence – get more children, young people and adults involved in physical activities

Making Coventry an attractive and enjoyable place to be

SCS 4. Cleaner, greener local streets and open spaces – improve the quality and use of local parks and open spaces

Ensuring that children and young people are safe, achieve and make a positive contribution

SCS 5. Children and young people – implement the play strategy and encourage more children to play outdoors

Encouraging a creative, active and vibrant city

SCS 8. Culture, sport and physical activity – increase participation and volunteering in cultural, sports and physical activities

Developing a more equal city with cohesive communities and neighbourhoods

SCS 9. Equality of opportunity and involved, cohesive communities and neighbourhoods – improve community engagement and meet local and national government requirements to involve local communities in partnership working and decision making. Improve neighbourhood planning to involve local communities in addressing issues and improve local service delivery.

Improving the environment and tackling climate change

SCS 10 Making a positive environmental contribution and tackling climate change – "Climate-proof".

6.2 How is risk being managed?

Play areas will be designed to achieve a balance between the benefits to children of a positive and challenging element of risk in play and their overall safety. Risk is considered and addressed at the planning stage so that significant risks are identified and managed to an acceptable level whilst still providing the desired degree of excitement and uncertainty to make the play areas interesting and attractive to children and young people. The draft Play Policy covers risk management in section 3.3 and recommends the 2008 guidance entitled 'Managing Risk in Play', <http://publications.education.gov.uk/eOrderingDownload/00942-2008DOM-EN.pdf>

As part of the project management process when delivering play projects, a comprehensive risk register should be completed and updated on a regular basis.

6.3 What is the impact on the organisation?

The impact on the organisation would be that the delivery of play areas across the city would be to a consistent model, based on national and local good practice.

6.4 Equalities / EIA

An EIA for the Play Policy is attached at Appendix 4. The Play Policy should have a positive equalities impact.

6.5 Implications for (or impact on) the environment

The impact on the environment will be a positive one, as designs for play areas will need to take climate change and environmental sustainability into account, as well as maintenance regimes. This is covered in section 3.2.5 of the draft Play Policy.

6.6 Implications for partner organisations?

It is key that partners are involved in supporting and delivering the Play Policy. Partners are covered in Section 4 and this includes a whole range of statutory, voluntary and community organisations. The implementation of this policy will also benefit this range of partners.

Report author(s): Gennie Holmes

Name and job title: former Play Strategy Manager

Directorate: former Children, Learning and Young People's Directorate

Tel and email contact: 024 7683 1172

Enquiries should be directed to the above person.


Contributor/approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Gennie Holmes	Scrutiny Co-ordinator	Chief Executive's Directorate		
Play Strategy Board			22/6/11	22/7/11
Children and Young People's Partnership Commissioning Board			18/7/11	18/7/11
Martyn Harris	Governance Services Officer	Customer and Workforce Services	19/7/11	20/7/11
Names of approvers for submission: (officers and members)				
Finance: Name	Colin Watkeys	Finance & legal	19/7/11	21/7/11
Legal: Name	Andrew Burton	Finance & legal	19/7/11	21.7.11
Director: Name	Colin Green	CLYP	19/7/11	20/7/11
Members: Name	Cllr Lynette Kelly	Cabinet Member (Education)	15/6/11	15/6/11

This report is published on the council's website:



www.coventry.gov.uk/councilmeetings

Appendices

Site	Ward	
Year 1		
Allesley	Whoberley	
Cash's Park	Foleshill	
Charterhouse Fields	St. Michael's	
Parkwood Meadows	Westwood	

Sovereign Row	Sherbourne	
Woodway Walk	Henley	
Year 2		
Alan Higgs BMX	Binley & Willenhall	
Bell Green	Longford	
Naul's Mill Park	Sherbourne	

<p>Primrose Hill Park</p>	<p>St Michael's</p>	
<p>Xcel Centre</p>	<p>Westwood</p>	
<p>Willenhall Brookstray</p>	<p>Binley & Willenhall</p>	
<p>Willenhall Wood</p>	<p>Binley & Willenhall</p>	

Floyd's Fields	Westwood	
Year 3		
City Farm	St Michael's	
Coundon Park	Bablake	To be completed March 2012
Edgewick Park	Foleshill	To be completed October 2011
Manor Farm	Henley	
Gosford Green	St Michael's	To be completed March 2012

Holbrook Park	Holbrook	
Memorial Park	Earlsdon	To be completed July 2011
Spon End	Sherbourne	To be completed December 2011
Red House Park	Foleshill	To be completed October 2011
Longford Park	Longford	To be completed October 2011
Caludon Park	Wyken	To be completed July 2012

Coventry City Council Play Policy V0.9 Plus Process.Doc

March 2011 – March 2014

1. Purpose

1.1. The purpose of this Play Policy is to bring together in one place the learning made from Coventry Play Strategy 'Something to do' 2008-2011 when developing play areas in public spaces. It is to be used in the context of developing and managing "open access unstaffed, outdoor play opportunities", normally, but not exclusively, in open public space. Through this policy Coventry City Council aims to:

- **Improve community engagement in the delivery of play spaces**
- **Improve the design of play spaces to ensure they are inclusive and serve their location**
- **Enable a "sensible" risk management approach, recognising that an element of risk is desirable in a quality play space**
- **Ensure that inspection and maintenance regimes are appropriate for play spaces.**

1.2. The policy covers play spaces for all children and young people aged 0 – 19 years, but recognises that disadvantaged groups need a special emphasis to ensure that they have equality of access to available play opportunities. Young people may not describe what they do as play, but they need the same time, space and freedom associated with play as younger age groups.

1.3. Much play does not take place in designated play spaces. Many children play at home or in the garden, use local streets or any local spaces and buildings from which they are not excluded. This can be particularly important for children with little or no play space at home. This policy however only covers designated outdoor play space and is for use by services that are involved in the development, management and maintenance of such spaces.

2. Principles

2.1. " Play is what children and young people do when they follow their own ideas, in their own way and for their own reasons." Play is fun; for anyone, at anytime, anywhere, with endless possibilities, alone or with others.

2.2. Through play, children and young people learn and explore the world. They gain knowledge of themselves and others. Play allows practice for life; creativity, contemplation, reflection, imagination, pushing boundaries and taking risks.

2.3. Play spaces should offer children and young people the opportunity to experience play within their local community and wider.

Appendix 2 – draft Play Policy

3. Practice

3.1. Community Engagement

3.1.1. The success of any play space is dependant on the support of the local community it serves. Therefore the engagement of those members of the community, including children and young people is vital. There are also key professionals whose advice, guidance and expertise is essential to gather. The process in Appendix A shows how this should happen. Each site should adopt the model to suit the circumstances and enough time should be allowed for the involvement to be meaningful. There should also be adequate funding allocated which should be included as capital fees. The consultation process should also take care to collect all of the relevant and required demographic information according to Council equality policy.

3.2. Design

3.2.1. In 2008 the Department for Children, Schools and Families produced 'Design for Play: A guide to creating successful play spaces'.
<http://publications.dcsf.gov.uk/eOrderingDownload/Design%20for%20Play.pdf>

3.2.2. This document provides the principles under which play spaces in Coventry should be designed. The document is an essential tool for any designer of play space. The 10 principles in the document (listed below) encapsulate an approach to designing play spaces which Coventry has adopted. However it is believed in Coventry there should also be an element of the play space that can involve the community.

3.2.3. Examples of this have been a tile project at Primrose Hill Park which pupils from local schools have made tiles which reflect the local history and environment of the park. In Willenhall local children have designed a coat of arms for the castle themed play area.

3.2.4. The 10 principles for designing successful play spaces

"Successful play spaces...

- are 'bespoke'
- are well located
- make use of natural elements
- provide a wide range of play experiences
- are accessible to both disabled and non-disabled children
- meet community needs
- allow children of different ages to play together
- build in opportunities to experience risk and challenge
- are sustainable and appropriately maintained
- allow for change and evolution."

(DCSF 2008)

3.2.5. The design should also ensure a positive environmental impact, taking into account climate change and environmental sustainability.

Appendix 2 – draft Play Policy

3.3. Risk Management

3.3.1. It is universally accepted that risk is an important part of children's play – play needs to challenge children and young people physically and emotionally to support their developmental needs. There is a benefit to children and young people in experiencing risk. It has also been recognised that over the last 20 years, risk has often been designed out of play provision, in order to reduce local authority's liability and to meet perceived health and safety requirements. This has led to uninspiring play designs that do not attract or challenge the children and young people they are aimed at. One way to address this is to incorporate design principles which address risk. (see paragraph 4.4)

3.3.2. However as a local authority we are still responsible for managing that risk. By increasing the risk and challenge offered to children and young people through play, we also need to balance that with our duty of care but not reducing the benefits on offer. The development of a risk/benefit assessment was a recommendation in the Play England guidance (see below) and also came from recommendations following a study tour by Council staff facilitated by PLAYLINK.

3.3.3. Current safety standards are for guidance only. We need to identify how Coventry will provide exciting and challenging play whilst ensuring the safety of our children and young people.

3.3.4. In 2008 the DCSF released guidance in a document entitled 'Managing Risk in Play', <http://publications.education.gov.uk/eOrderingDownload/00942-2008DOM-EN.pdf> which should be used as guidance for managing risk in play areas. This document advocates a sensible risk management approach and the use of risk/benefit assessment.

3.4. Inspection and Maintenance

3.4.1. A play area that is kept well is more likely to be respected by local users. Negligence can lead to a spiral where play spaces can quickly become no-go areas which create further neglect.

3.4.2. By improving the design of play spaces to incorporate playful environments this offers challenges to the way that play provision is maintained and inspected.

3.4.3. At the moment most play provision is based upon fixed play equipment which is inspected against certain standards. However by incorporating play opportunities which are bespoke or do not conform to standard manufacture this poses a challenge to those inspecting. This creates considerable changes to the way in which these spaces need to be maintained. Play spaces are less likely to be "standard" and will be individual and unique, with more horticultural elements as well as natural features, requiring a certain level of local knowledge and expertise.

Appendix 2 – draft Play Policy

3.4.4. The staff delivering the maintenance should be sufficiently skilled to be able to deliver this work. There should be provision made so staff are able to access additional training if required so the sites can be effectively managed and maintained.

3.4.5. A neighbourhood approach to maintaining green spaces means that maintenance team members are more likely to be familiar with the specific needs of play space, bespoke to that area. Regular audits should be completed so that quality can be monitored and performance managed over time to agreed standards.

3.4.6. This policy also recognised and supports the role children, young people, their families and the wider community have, to use sites appropriately and to report any issues or damage through the correct process, such as the contact centre.

3.5. Planning and Section 106 agreements

3.5.1. This policy will provide a framework for planners when drawing up S106 agreements with developers where play provision has been proposed and should sit within the context of the Coventry Development Plan, specifically GE1, GE8, GE9 and GE10.

3.5.2. Section 106 agreements should take into account the ongoing management and maintenance costs of capital play developments for life time of the agreement as well as the original investment costs.

3.5.3. Any future planning documents should also take consideration of the content of this policy, with this document forming a supplementary planning document.

4. Partners

4.1. This policy recognises that responsibility for play covers several departments and services within Coventry City Council as well as other external organisations and service providers. This policy also recognises the benefits of play facilitated by adults for children and young people. In the delivery of this policy recognition and support should be made for those services and organisations planning and delivering play activities with children, young people and their families.

4.2. Key Delivery services

4.2.1. City Services and Development

- Parks
- Streetpride
- Planning
- Project Management

4.3. Other Public Sector organisations

4.3.1. Health (health and well-being board?)

4.3.2. Coventry Partnership

4.3.3. Children and Young People Strategic Partnership

4.3.4. Police

4.4. Voluntary Organisations

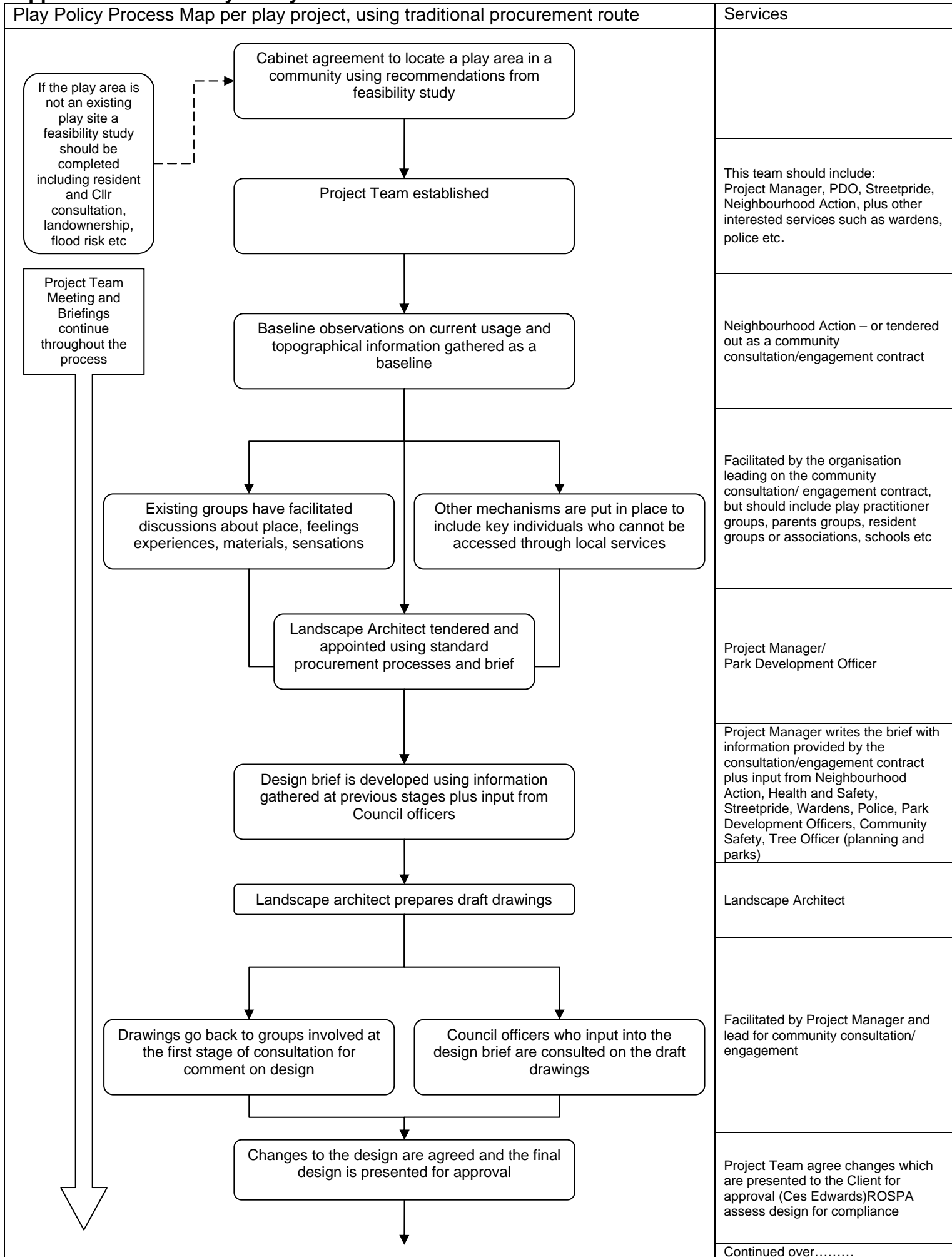
Appendix 2 – draft Play Policy

- 4.4.1. NE Play Practitioners group (facilitated by Warwickshire Wildlife Trust)
- 4.4.2. Any other play practitioner groups or networks in that location.
- 4.4.3. Local community organisations, such as Friends groups or resident associations

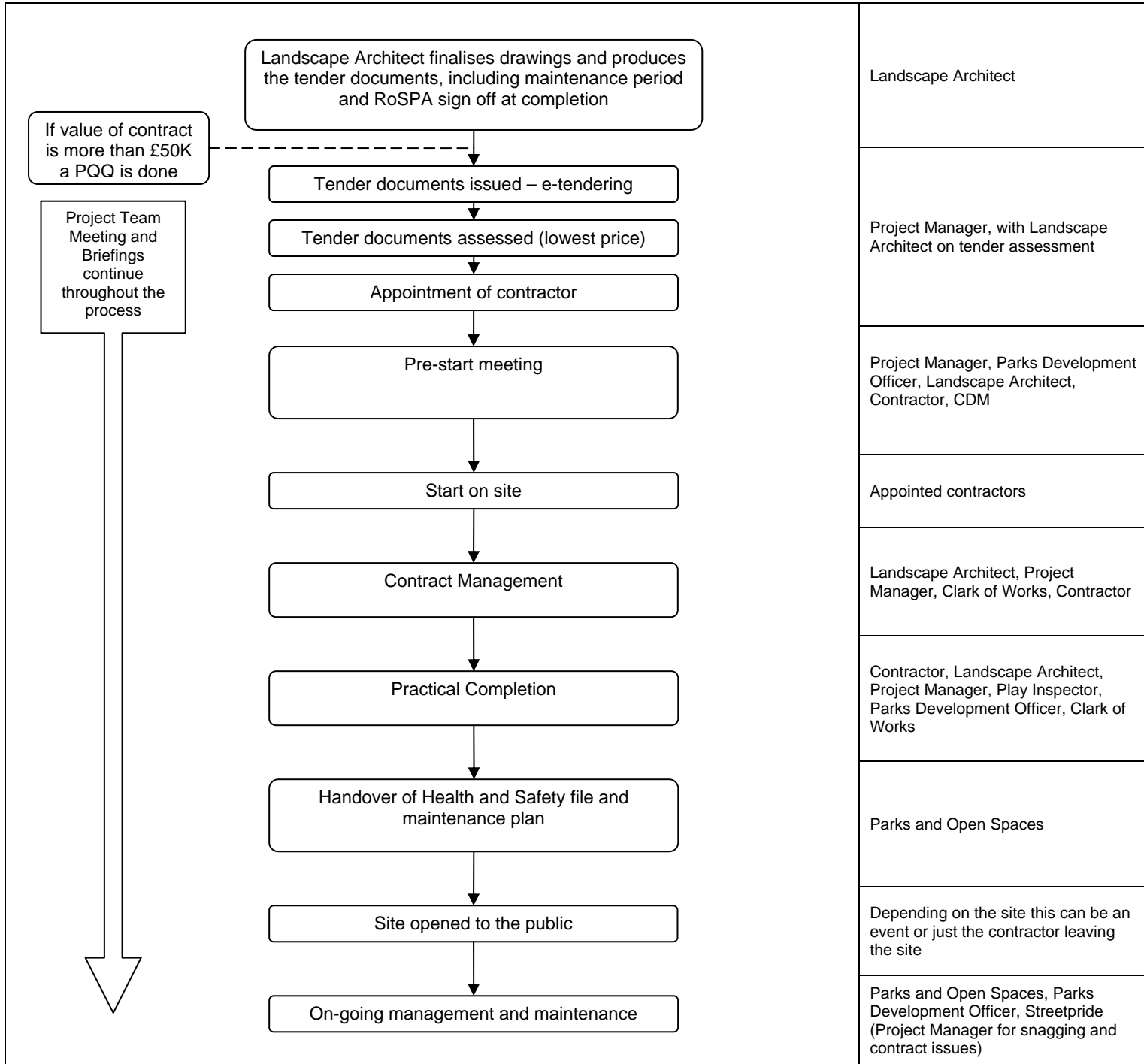
5. Governance

- 5.1. The monitoring and scrutiny of this policy is to be delivered by an elected member. This elected member should be identified at the Council's AGM. The role for this member, as Play Champion, is to ensure that the procedures outlined in Section 3 are being adhered to and quality assured. It is recommended that this role is not carried out by the Cabinet Member for the services expected to deliver those procedures. Officers from City Services and Development should report to the Play Champion on a six-monthly basis on the progress and implementation of this policy with regard to play areas. The relevant Scrutiny Board may also require information when necessary.
- 5.2. Role of the Play Champion (adapted from Play England Play Champions – The Challenge)
 - Represent children's play at cabinet / elected member level
 - Represent children's play at key strategic level, across all local authority departments and influential groups
 - Support the true cause of play and challenge barriers to play
 - Support the procurement of resources for play (financial and people)
 - Engage with stakeholders including children & young people
 - Keep up-to-date with current issues relating to play
 - Build allies and work in partnership when planning for play
 - Provide a monitoring and oversight role for the delivery of this policy.

Appendix 2 – draft Play Policy



Appendix 2 – draft Play Policy



Play Strategy Case Studies – 2009-11

Case Study – Woodland Play at Canley Brook

Adventure on your doorstep

Total Budget – £45,000 (£10,000 CCC, £35,000 Groundwork Coventry and Warwickshire)

Landscape Architect – Louise Kovarovic – Kova Landscapes

Contractor - Blakedown

Background

From the Play Strategy Action Plan

"Develop strategies to improve use of Coventry's woodlands and green space in terms of naturalised, informal play and link with the Tree and Woodlands Strategy"

Canley Brook is a play project that has been funded through the Canley Regeneration Project and WREN (Waste, Recycling Environmental Network) through Groundwork UK and a programme called adventure on your doorstep.

Before



After



Information we have collected and how we collected it?

Statistics

Usage before and after

From information gathered by Groundwork as part of the initial consultation work to inform the design it would seem that the site is mainly used as a cut-through to access the school and the open space on the side of the river, by dog walkers and there were some reports of youth using the site as a drinking area. This information mainly came from the Canley Community Forum and the Canley Youth Forum. This

information was gathered in October 2009 (See Appendix 1 for the full consultation report)

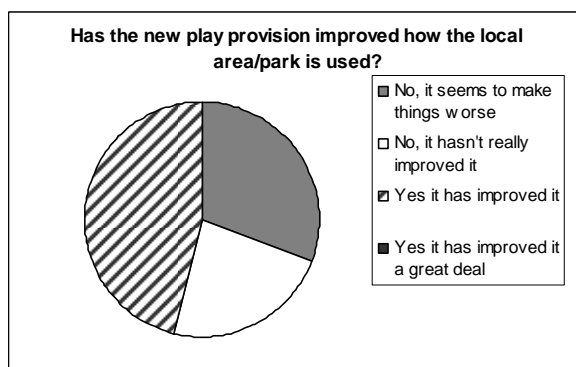
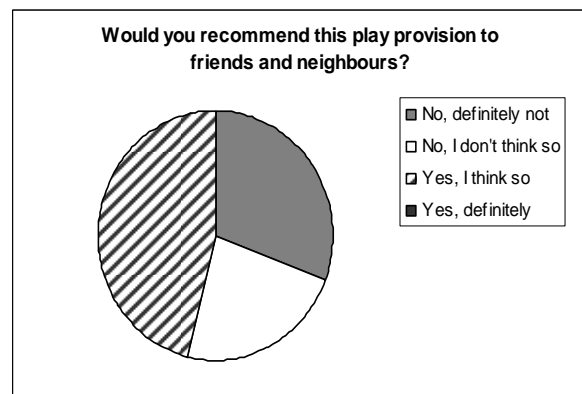
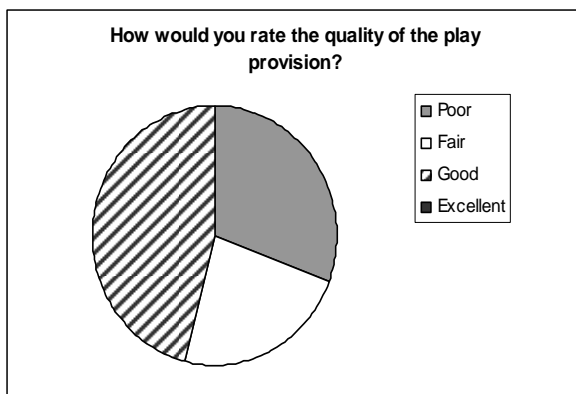
Reported ASB/crime/vandalism before and after

There have been no reported crimes for the Brook area – however this is because reports need to be allocated to an address. Information from the police suggests that:

"there is always evidence that the area is used in the evenings as a congregation area for drinking and smoking. There is also evidence that fires are made in the circle seating area suggesting they are there very late at night. During the day there have been many times when I have seen young children using the area as it was intended. I think any problems come later in the evening. The only people that will see this are dog walkers. I have contact with a number of dog walkers in that area and none of them are reporting any issues. The general consensus is there has been an increase in litter, vandalism and ASB around the area of the park. The PCSO's in the area all report that residents complain to them about these matters"

What people tell us

During the Play Day event in the summer some satisfaction questionnaires were completed. The weather was not favourable and numbers were low. We did however get 13 completed questionnaires. This was from seven 8-16 year olds and five 17-64 year olds. The responses were as follows.



From this information it would suggest that there are mixed feelings about the new play provision. Some of this comes from the fact that it has been a focal point for young people gathering at night and also the "natural play" approach to the design, dictated by the site and budget.

"Location wrong place, quality of play equipment looks cheap"

"Teens spoil the play area by lighting fires and breaking things"

"Children can use their imagination and it's nice to see that it's so natural. But vandalism is a problem in this area"

It could also be that expectations regarding the possibilities within the site and budget were not communicated effectively to a wider group of residents and local people.

Involvement in the development of the site

Groundwork West Midlands in partnership with Neighbourhood Renewal have led on the consultation and involvement process, the purpose of which was:

- To understand how the space by the brook that was proposed for development was used by the community.
- To understand the issues associated with the development of this space.
- To gain ideas and views on the elements of natural play that could be introduced to this site.
- To gain buy in from the local community for the project.

The consultation ran throughout September 2009 and included:

- Canley Community Forum – Saturday 5th September
- Charter Primary School – Year 6 – Thursday 17th September
- Charter Primary School – Year 5 – Tuesday 22nd September
- Canley Youth Forum – Wednesday 30th September

These sessions were planned and delivered by staff from Groundwork West Midlands and Neighbourhood Renewal. The Landscape Architect also attended and played an active role in the delivery of the two school sessions.

In addition to this there have been several community days where members of the community have been involved in firstly clearing the site, ready for construction (date and photos here) A second ran on 20th March, after the works had started on site which was to, again, further involve members of the community on the site.

An artist was also commissioned to develop some designs with the local school children that have been incorporated into totem poles on the site as well.



Project Team

To deliver the project a project team was put together with representation from Groundwork, Neighbourhood Renewal, Project Champions, Landscape Architect and Culture, Leisure and Libraries. This group was brought together once the project had been completed to share experiences, key issues and also how they felt the process had worked, both positive and less positive.

The project team was created due to the fact that there was no individual client for the project – Groundwork West Midlands and Project Champions were joint budget holders (75%:25% respectively) and Culture and Leisure were considered landowners. The site is now part of PPM. The landowners had no stake in the budget. In addition the community's views were represented strongly, including children and young people, as well as other stakeholders such as the police and the play strategy manager.

The team thought this was an effective model, where all key stakeholders are represented, especially as it was initiated at the very beginning, design stage, of the process. It also was positive to have a designated project manager on board to offer overall leadership for the team. It was recognised that the complexity of the relationships meant there was the potential for things to get complicated, but actually the team came together well.

Key messages from the Project Team

- Strong partnership working the key to smooth running of project
- Ability to utilise existing relationships in the community
- To take the risk and deliver the project anyway – i.e. we know the risks in terms of anti-social behaviour to project but to take a chance anyway and invest in Canley
- Project is a bespoke play area that cannot be compared to other sites, and encourages natural play

Site issues

Due to the unique nature of the site there were issues that arose that may not be relevant for other sites. However Friends of Canley Green Spaces have held a meeting at site, and will continue to use the site during the summer months Charter Primary School will use the site as an outdoor classroom. Certain behaviours remain in terms of people drinking at site. The Police have agreed to monitor the site more and the school are keen to become "eyes and ears" and report problems back to Sustainability & Community Programme Team or Neighbourhood Management.

There has been some vandalism at the site, with a few of the trees and shrubs being removed and damaged, and tree covers thrown into brook. The totem poles graffiti has been removed. The site was designed to be low maintenance; there is no ornamental planting, very simple play equipment. However the bark mulch will require topping up by around spinning disks. There is no litter bin at site. This was ruled out due to increased maintenance costs of emptying throughout the year. Site now comes under PPM land ownership. The Friends of Canley Green Spaces group could bid for small pots of money to replace plants and shrubs as required.

How can we use this information for the future?

Community involvement

The community involvement worked well, especially in terms of children and young people. However there is some evidence to suggest that not all of the community, especially those who don't participate in existing groups, were not aware of the details of the project and therefore the play area did not meet their expectations. As from other case studies the presentation of designs are not always easily understood by the general public. There should be consideration taken into how designs and plans can be communicated more easily. There was a significant amount of investment in the consultation process for this project, which was built into the budget. This needs to be included in all play capital projects.

Design

The design fitted well in terms of the location and budget available, providing a variety of play experiences in a small "doorstep" facility. Some interpretation boards or signage could support local people's understanding of the site and its play value.

Risk management

The location of the play provision identified certain risks, such as a wooded location and proximity to the river. However these were built into the design, current activity on the site was accounted for and risk managed accordingly.

Concerns about ASB have been realised, but there should be an awareness made with local residents about the importance of reporting incidents so they can then be acted on by the appropriate service. Information from the police would suggest that the situation hasn't become any worse, but there needs to be data gathered to monitor the situation.

Maintenance

There are some concerns over maintenance of this site, in terms of clarity regarding who is responsible for the maintenance and management of the site. The fact that there could be no bin on site due to budget restraints is worrying, reflected in anecdotal evidence of litter on the site.

Is there anything that can be learned from the approach taken for other woodland areas in the future?

- Overall there has been delivered a good quality play provision delivered considering the budget and site restraints. There was a good engagement process and local children have been closely involved, especially the school and children's centre. The involvement of a community artist has further enhanced this process. Already active local residents have been involved and recognition needs to be made of the difficulty in engaging with local people in areas such as Canley.
- It maybe worth considering different methods of presenting designs with local people rather than relying on two dimensional images. It is not clear that members of public can easily visualise the completed works from the page.

- Choice of contractor should also be carefully considered when working on tricky locations within woodland to ensure smooth delivery of the construction work.
- Issues about landownership and responsibility for on-going maintenance should be clarified and agreed before the design process as these could have implications for the design.
- Partnership working is essential, as is linking with existing networks and partnerships. However this should not negate the need for further community development.
- A sensible risk management approach should be taken, recognising that local children will already be using such areas for play.
- Anti-social behaviour concerns should be considered but should not rule out the use of this kind of space for play, especially as woodland sites are anecdotally used for drinking and fire-setting. At the moment there wouldn't seem to be any evidence to suggest the play area has increased ASB at this location.

Case Study – Parkwood Meadows

Equipment-less Play

Budget – £175,500 (£25,500 Playbuilder, £85,000 CLL, £65,000 S106)

Landscape Architect – Sal Bridges – Coventry City Council

Contractor - HFN

Background

Parkwood Meadows was identified as a site for a new play area as part of a Section 106 agreement through the building of new homes on an adjacent area of land. Initial attempts to consult with local people caused significant opposition to the proposals, with concerns about anti-social behaviour and young people being the main objections. This meant that a new approach was needed to be taken to try and challenge these preconceptions about play areas and the negative feeling local adults may have.

Canley Regeneration team were already actively working with members of the local community. The lead officer for the consultation process was a member of the Play Strategy Board and it was suggested that the Play Strategy Manager took part in the process.

The outcome of this process was an engagement methodology which has been adopted across the whole play programme. See appendix A for the evaluation report of the engagement process.

Information we have collected and how we collected it

Usage before and after

The site was an unmanaged piece of land that had been used as spoil from the development of the housing estate behind the space. As the site was not a play site before the works were planned there was no baseline. There was evidence that it was used as a walkthrough for dog walkers to the woods and also as a shortcut. Anecdotal evidence from the residents from the new estate suggest that young people used it to hang around and also used it as a way to break into back gardens as the site is very close to the housing boundary. This was one reason that the resident raised concerns about putting a play area on that site.

Once the site has been completed and the observation process was completed on this site, only 4 children were observed during this time. It was proposed that local people do not fully grasp the value of natural play features that are on offer. Also there is currently a lack of signage and interpretation boards so there is no official "permission" to play on the site.

In order to address this lack of use on the site it was decided to utilise the Play Activator project to deliver sessions on this site. Again, these sessions were not well attended. In order to raise the profile of the site it was agreed that activities on the

site would be part of the 2010 Play Day celebrations. This took the form of a multi-agency event to encourage activity on the site. This was more successful and hopefully will have started to encourage people to use the site more.



Parkwood Meadows Play Day
2010

Site issues

There had been difficulties in the past, on the recreation part of the site, with anti-social behaviour. Young people had used the site to camp and had caused considerable noise and disturbance to local residents. This led to the resistance experienced from local residents at the initial proposals for the development of the play area. In addition there were concerns from residents to the proximity of the open space to their properties.

The site also experienced water logging and drainage issues and the other side of the site is ancient woodlands. There was a desire for the access to the woods to be opened up, but to remain sympathetic to the nature and environmental feel of the space. There were limitations on the design due to a badgers set being present close to the proposed development areas.

Involvement in the project

The project was mainly managed through Neighbourhood Development Team, who led on the community engagement process and by Culture, Leisure and Libraries who led on the design, delivered in-house. As the design and project management was led by an internal landscape architect, handover to the Park Development Officer was fairly simple and information was shared internally.

What does this information tell us?

Positives

From a starting point of difficulty has emerged a process for engaging the local community which has provided a framework for the whole of the play programme. This approach does take time and also resources from staff skilled in community engagement. However the investment has been worth it. The residents who expressed concerns have fed back their pleasure at how the site has been

developed. They acknowledge that their concerns were listened to and addressed through the design.

The design has been the most innovative play area design developed through the play strategy. There is very limited reliance on fixed traditional equipment play opportunities are found through natural and bespoke features.

Not only has the design addressed the concerns felt by local people but it has also been praised for providing a sympathetic “semi-rural” feel for the area, in keeping with the wood on one side and the open field recreation ground on the other. The design was nominated for a Coventry Design award.

The design also means that the maintenance of the site is fairly simple and there is a natural process of maintenance. Due to the lack of equipment there has been no vandalism and nothing to “go wrong”. There are issues of litter on the site, which can get caught in the longer grass. The maintenance of the site has not been handed over to Streetpride as of yet, but it is important that the maintenance is kept up to standard.



Negatives

Due to the innovative design it is not easily identifiable as a “play area”. The numbers using it for play have been limited, but hopefully this will change over time as members of the community become more familiar with the space. There are more people using the space and it has brought into use an area that was not used before. Also it has been positively received by local residents.

How can we use this information for the future?

Community involvement

This project had a fundamental effect on how the play strategy developed its engagement process. The lessons learned and the methodology were adopted for the remainder of the Play projects and has been proposed to be adopted as Council policy for engaging communities in the development of play areas in future.

Design

As an experiment in design it features natural play in it most extreme. The design suited the site and the circumstances. This is something that should be considered on all sites. If there had been an existing play provision on this site, this design would not have been suitable.

Maintenance

Due to the play feature mainly being reliant on natural features the maintenance of this site has been horticultural but has posed some complexities as it is maintained not as a play area, but as a green site.

Case Study – Primrose Hill Park Date August 2008 - April 2010. An example of a complex site

Budget – £113, 616 (Big Lottery, S106, Playbuilder)
Landscape Architect – Sal Bridges – Outerplace
Contractor - HFN

Background

Primrose Hill was identified as a complex site by the Play Board, so although it was one of the sites started first it took two years until completion.

Hillfields is in one of the most disadvantaged wards in the city – St Michael's. Due to this, over the years it has been the recipient of several regeneration programmes. However the disadvantage remains. The local area has a high population churn, with student housing as well as social and private rented accommodation. It is also the location for many newly arrived families, which contributes to the turnover of residents and the ethnic diversity of the area. Despite this there is a core group of active and loyal residents, and numerous voluntary and community organisations. Primrose Hill park is located centrally to the area and is between three local primary schools, one of which is a Catholic school.



The site is enclosed by houses situated in the centre of Hillfields. There is a hill within the park about which there are a range of legends and tales; that the park was a quarry in medieval times and that the stone for the city walls came from it; that the site in the eighteenth century was the landscaped grounds of a Gentleman's residence; and that it is a Giants Grave. The hill is believed to be made of building spoil. The hill has contributed to many local's fears about anti-social behaviour.

Anecdotal evidence from local people would suggest that the park has a bad reputation. It has a reputation for drug dealing, sex workers, anti-social behaviour and training of fighting dogs. This however is not backed up by police statistics, although there have been a few high profile crimes linked to the park and evidence of dog training on the equipment.

Despite this reputation the park is always well used, either by people passing through, walking their dogs, using the MUGA or playing on the equipment.

Information we have collected and how we collected it?

Methodology

Stage 1

A project team was pulled together that consisted of representatives from all the key agencies and departments involved in the park. This was facilitated by PLAYLINK. Using the PLAYLINK proposed consultation model we invited a group of local people, including officers who had an interest in the development of the park, as well as residents who lived directly adjacent to the park. This included a group that had evolved from a history project, into a Friends group that had merged into the local Environmental Action Group that was supported through Neighbourhood Management and Working Actively to Change Hillfields (WATCH). This group was invited to talk about their concerns and aspirations for the park, as well as discussions around natural play and the design principles of the Play Strategy. In addition to this, consultation was delivered in two local schools, to ensure that children's views were also included in the process.

This information was then used to develop the design brief for use by the landscape architect to develop the draft designs.

Stage 2

The draft designs were subject to much discussion – mainly around anti-social behaviour issues and maintenance issues. The main concerns were about the practicality of maintaining the play area, so low maintenance options were discussed between City Services and the designer.

The project manager joined the Hillfields Environmental Action Group, so members did not have to attend another meeting. The draft designs and comments were fed back using this group. The groups of children were also asked for their comments as well as a children's club operating at the local youth centre.

The draft designs were put up in a local community cafe and an open invitation was sent out to local residents to come and discuss the designs and to ask questions and to feedback. Local PCSO were very supportive in delivering letters to local residents inviting them to the design displays.

Again these comments were recorded and fed back to the designer. One of the key concerns was anti-social behaviour. The project manager specifically met with the local police inspector who was able to give advice on such things as entrances and exits, where best to locate the domehawk camera, making sure it was not hidden by any of the planting.

Lighting and access to the adjacent properties was a consistent concern and was raised at the local Safer Neighbourhoods Group. The project team did take these issues on board but were clear to point out that the budget was specifically for play improvements and could not be diverted to anti-social behaviour interventions. Defensive planting was one option presented to deter people from climbing over walls; however alternative budget had to be identified to support new and additional lighting.

Participation project

Before the play project started there has already been a successful SITA Footprints bid by Warwickshire Wildlife Trust (WWT) to develop some community planting and art work around the history and nature of the park as a follow on from the history project. It was felt advisable to streamline these two projects to make sure that any work delivered through the WWT was complimentary to the redevelopments of the park as a whole. A representative from WWT was part of the project team and there were close discussions between WWT and the designer and project manager to enable this to happen. There needed to be some renegotiation of the SITA project timescales. As a result the final art work was a tile project delivered by a local artist, local people and school pupils who designed tiles based on the nature and history of the site. These tiles were then incorporated into the architectural wall as part of the park improvements. Also an area of the park was set aside for the planting project.

Baseline observations on site

As the site has not been open a year yet, there is only baseline information available. Progress data should be available by the end of the year.

Throughout the observation visits there was no pattern to the numbers of children accessing the enclosed play area in comparison with numbers accessing the wider park. On three occasions there were more children in the enclosed play area, on one occasion there were more in the wider park and on the weekend visit the numbers were evenly split between the enclosed play area and the wider park.

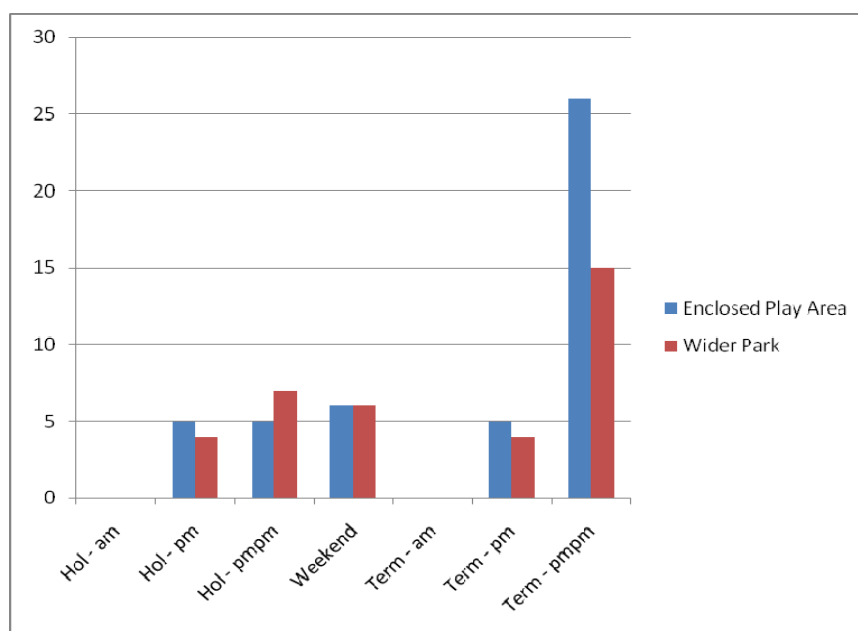


Figure 7: Children observed accessing site by visit time



The equipment in the enclosed play area was in relatively good condition, although the swings had been damaged by people using the seats to train dogs. However it was old and some pieces had obviously been removed.

There was also evidence of tagging on the equipment both in marker pen and also in paint. The surfacing in the enclosed play area was looking tired and appeared to have been burnt in places.

Those using the wider park were sat on the hill or the benches, accessing organised sessions in the MUGA, as was the case on the term time evening visit when there were 15 young people aged 16+, and playing informal games of football or using bikes.

The most popular time to access the park recorded on these visits was the evening, 64% of the children and young people observed were seen in the evening visits. This could be linked to the sites location in the centre of an area of relatively high density housing.

Dog walkers were observed at the park on only 2 occasions. There are bins for dog waste provided in the park and these are obviously used although not on every occasion. On one of the occasions a dog walker was seen, the dog was off the lead, but did stay close to their owner.

The children were regularly in small family groupings; especially the ones recorded using the enclosed play area and those in the younger age groups. On the Saturday visit 10 of the 12 children were accompanied either by parents or older siblings.

The ages of the children accessing the site were estimated to be as follows:

Age	0-4	5-7	8-13	14-16	16+	TOTAL
Frequency	7	32	9	8	17	83

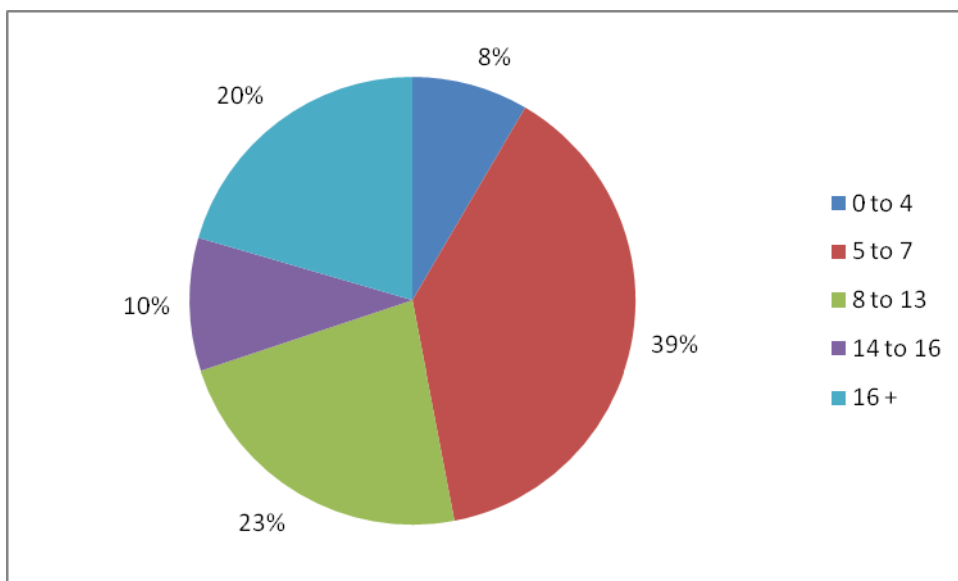


Figure 8: Breakdown of age groupings using the site with percentages

The age group observed accessing the site the most was the 5 to 7 year olds (39%), followed by the 8 to 13 year olds (23%).

The ethnic background of the children using the site was recorded (officer determined). The park was used by a mix of ethnic groups which reflects the local community. The results were as follows:

Ethnic background	White	Asian	Mixed	Black
Frequency	45	25	9	4

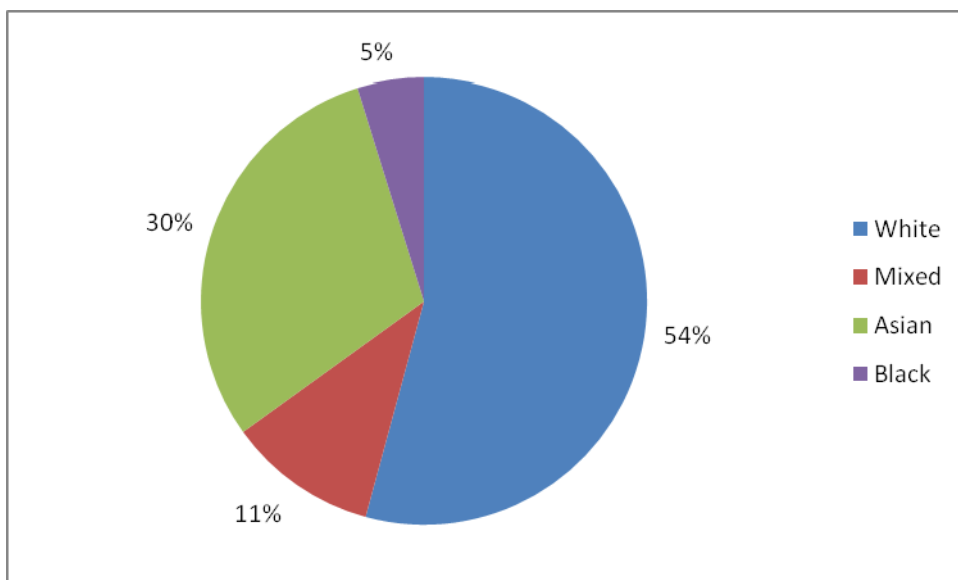


Figure 9: Breakdown of ethnic backgrounds of users with percentages

However this data is not truly representative of users of the site, as within the White category there were a large proportion of Slovak and Czech children using the site. The use of the broad ethnic groupings, including White does not fully reflect the make-up of the local community.

Reported ASB/crime/vandalism before and after

Despite anecdotal evidence from local users, as well as officers to suggest that there are considerable issues in Primrose Hill Park there would not seem to be the data from the police to suggest that there was any significant problem in the park compared to Hillfields as a whole.

A snap shot of the summer periods was taken, as these are the high usage time of year for the parks, comparing before and after the improvements were made. During July and August 2009 there was a total of 2 reports (1 for litter and 1 for an assault). There were no reports of anti-social behaviour. During July and August 2010 there were a total of 3 reports (1 for fly-tipping, 1 for graffiti removal, 1 for litter). There were no crimes reported and no anti-social behaviour.

These statistics would suggest that there has been no significant difference in reported incidents, either in terms of maintenance, or crime. However it could be suggested that local people don't report incidents, so they are not recorded.

Part of the message to local people, during the consultation, when these concerns were raised, was to report any problems of concerns they had, either to the police or by using It's Your Call.

Involvement in the project team

There was a well established project team in place for this project. To various degrees there were regular contributions from the Parks Development Officer, City Services, community engagement, Wardens, PCSO's, Ward Councillors, as well as input from local people and children from local schools and services.

Due to this broad involvement in the project team, it was sometimes difficult to focus on the play element of improvements to the park, especially when there were such serious concerns about ASB. However having many partners around the table meant the additional resources could be identified through the Safer Neighbourhood Group to address the lighting in the park, which the play budget would not have been able to address.

Links with local organisation WATCH also meant that a community group CommEnt were able to support the launch event of the park over the summer.

What difference has the project made

The environment in the park has been significantly improved. The park was fairly well used before but usage has increased. The improved lighting has anecdotally reduced the use of the park by sex workers and there is a perception that it is a safer park now.

The park is used in different ways from before; the hill is used more, as are areas that were dark and neglected. The turfed area is also used more. It has opened the park up to all.

Local Neighbourhood Wardens have reported that since the park has been improved there has been a reduction in ASB in neighbouring streets as young people can be directed into the park.

Over all there has been a positive change to the park which provides a good foundation for further improvements.



How can we use this information for the future?

Community involvement

The tile project has been very successful – local children and young people were involved in creating tiles that reflected the character and history of the park. These were then installed as part of the wall feature (see picture above) There has been very little vandalism to the feature and the children were very pleased that they had created something in the park. This project was supported through a Warwickshire Wildlife Trust SITA Greenprints project. This is an excellent way of getting local people involved in the developments.

There needs to be better explanation of the architectural designs. Local people do not necessarily understand architect's drawings. Cross sections and sketches would be more effective at portraying what the eventual design will look like. It is likely that people commented on the elements going into the design, rather than the design over all. This led to a difference in expectation on the design. Also clearer explanation and communication about natural play elements would support this – linking with local stay and play or nurseries for example.

Also the difficulties of engaging with such a diverse and changing population should not be underestimated. Some people felt that although a lot of effort had gone into engaging with local people it hadn't been totally successful.

Design

In terms of design for play the park was considered as a whole, rather than just allocating a specific area for play provision. This has meant that there are play opportunities throughout the park and children and young people are not consigned to a "designated" area. Where budget allow this should be considered for future sites. Bringing the hill into use has been particularly popular.

- Planting schemes. The planting schemes delivered by the design were too complex for this kind of site. The plants have not on the whole survived, they have been vandalised or stolen. However the defensive planting scheme against local residents back walls has addressed some concerns about anti-social behaviour. One suggestion is that the planting is staggered to allow time to settle in.
- Loose fill. It is important to consider the appropriateness of loose fill to a particular site. At this site it offers an additional play feature as well as a safety surface. However there is a considerable amount and can lead to difficulties in maintenance. Loose fill should be appropriately contained.
- Natural play elements. There should be support for local users on how to get the best benefits from the whole space rather than just the fixed equipment. There have been concerns raised that there is nothing for younger children. The design has larger fixed equipment for older children and young people and the play opportunities for younger children come from the natural play elements. It should be noted that if play equipment is removed from an existing site, something comparable should be put back in. Also if mixtures of fixed and natural play elements are used, these should both cater for all age ranges.

Risk management

This site has taken a risk benefit approach to the play element. There are some risky elements which are unusual and fairly unique to Coventry. Also the fencing that was around the previous play area has been taken down. This has not caused significant issues on this site.

Maintenance

There are potentially some issues with maintenance at this site, as the number of people has increased, which in itself creates more litter and more wear and tear. Also the nature of the site and the area which it is located means it is vulnerable to vandalism, although no serious incidents have been recorded so far.

Case Study – Sovereign Row

Budget – £121,345

Landscape Architect – Sarah Grierson – The Beckett Company

Contractor – Jack Moody

Completed March 2009

Background

Sovereign Row was identified as a Year 1 Playbuilder site through a DDA assessment that the Parks Service had carried out. Sovereign Row was considered to be in need of refurbishment to meet the DDA requirements. We were able to use Playbuilder funding to enhance the Park capital budget to enable the play area to cater for a wider age range. The required timescales for the Year 1 projects were very tight, so the engagement process and the design work were negotiated on current contracts to save valuable time.

Usage before and after¹

As part of the year 1 programme all sites were observed for usage levels before and after the play areas were refurbished. This work was carried out alongside the consultation by Groundwork Coventry and Warwickshire (now Groundwork West Midlands)



On the observation visits the site has appeared clean and tidy, there was one visit when an overflowing rubbish bin was reported to Coventry Direct. There has not been any major vandalism or graffiti on the site. When it was first installed one of the trampoline tiles had to be replaced after it was burnt and the plastic melted and there is some minor tagging with marker pens, these have now been rectified. The lack of graffiti and vandalism is possibly due to a number of factors, the ownership that people have developed for the park and the respect for the improvement to the facility and also the proximity of the graffiti wall on the hoardings alongside the Butts Rugby Club. On one of the observation visits it was noted that there were two rough sleepers in the park.

¹ Groundwork Coventry and Warwickshire (November 2009): Playbuilder Observation Comparative Report p44-50

The observation visits in Year 2 imply that there has been a decrease in usage as there were fewer children recorded using the site, however it must be remembered that the observation visits are designed to be a snapshot of usage. From conversations with users and local residents there is a feeling that usage has increased since the improvements. A group of parents from Earlsdon regularly meet in the park, phoning one another as they are about the head down, and over the summer they took picnics down to the park allowing the parents to socialise while their children keep themselves entertained playing in small groups. The parents and grandparents who were with children using the site on the Saturday visit told us that they travel from Walsgrave and Stoke to use the facilities at Sovereign Row Park as they feel there is a good mix of equipment for all ages and they do not feel there is a comparable facility in their neighbourhood. The return afternoon visit occurred before the end of the school day so we missed a potential group of users. On the observation visits comments were made about the equipment being used, there were commonly younger children and toddlers playing in the enclosed play area and the cross scales and trim trail equipment was also regularly used. The item which was infrequently used was the climbing unit (pictured below) on talking to some of the parents this was because the children found it too challenging to use properly currently, they were not concerned by this as they commented that it would keep their child's interest in the park maintained for longer as they wanted to keep coming back to attempt to master it.



Outside of these observation visits Groundwork took a group of resident from Rugby to Sovereign Row Park as part of a consultation process for the development of a neighbourhood play facility in Bilton, Rugby and while on site there were a group of young males (14-16 year olds) who were using this piece of equipment and enjoying the interaction with each other.

The age breakdown of the users of the park was as follows:

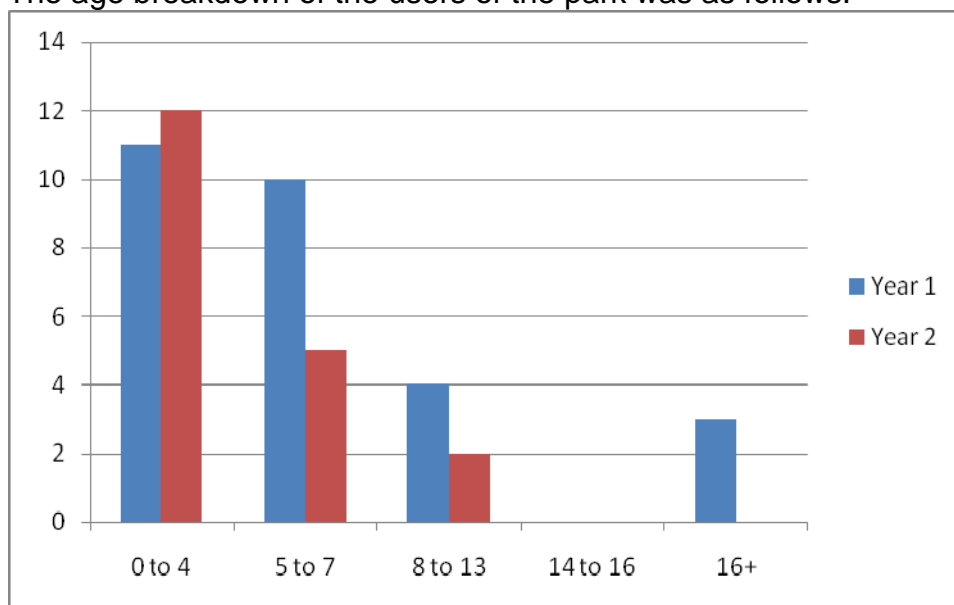


Figure 15: Changes in age groupings of children accessing Sovereign Row Park

This figure shows that the improvements at Sovereign Row Park have been successful at providing more play opportunities for both the 5 to 7 year old age group and the 8 to 13 year old age group, with 50% increases in both categories.

The male/female split changed between the two years, with more males accessing the site before the developments and more females post development, however the figures are close for both years, so no firm conclusion can be drawn from these figures.

Gender	Male	Female
Year 1 Frequency	17	11
Year 2 Frequency	9	10

The ethnic background of the children using the site was recorded (officer determined). In both the initial and return visits the majority of children observed were white, however small groupings of children from other ethnic backgrounds were observed during both sets of visits.

Ethnic Background	White	Asian	Black	Mixed Race
Year 1 Frequency	22	1	5	0
Year 2 Frequency	14	5	0	0

The most popular time for people accessing the park when baselining the site had been the late afternoon, early evening term time visit when 11 children were observed accessing the park, on the return visits the Saturday visit recorded the highest number of children playing, when 7 were playing, however if we remove this

record because of a lack of comparable data from year 1, the most popular time remained the late afternoon, early evening term time visit when 5 children were observed.

The following graphs recap on the comparison of data for each visit:

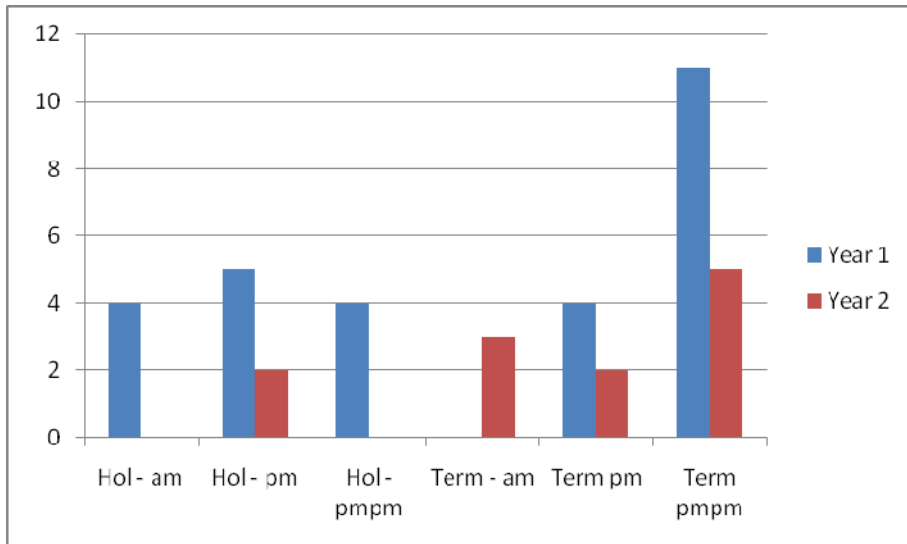


Figure 16: Comparison of data - children accessing Sovereign Row Park

In conclusion, although the data implies that there has been a decrease in use at Sovereign Park we do not believe that this is a true reflection of current usage, especially as the term time observation visit happened before the end of the school day. The site is always fairly busy and on informal visits, always has plenty of users. This can also be noticed in the fact that the bins are fuller and there is notable usage wear and tear on the equipment and the grass around the equipment.



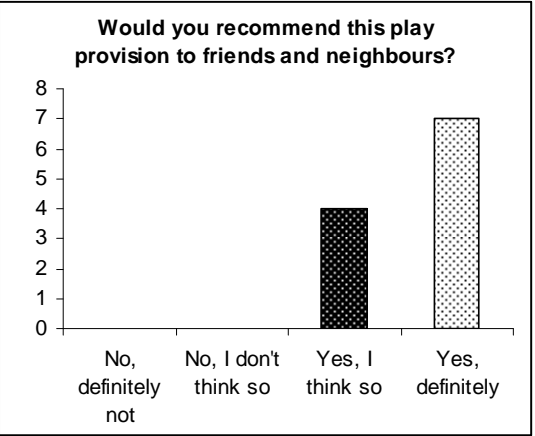
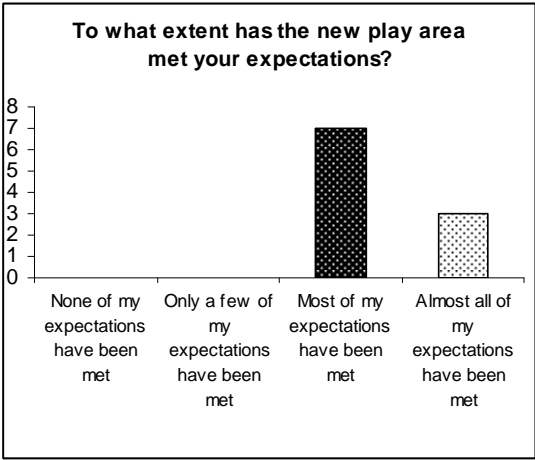
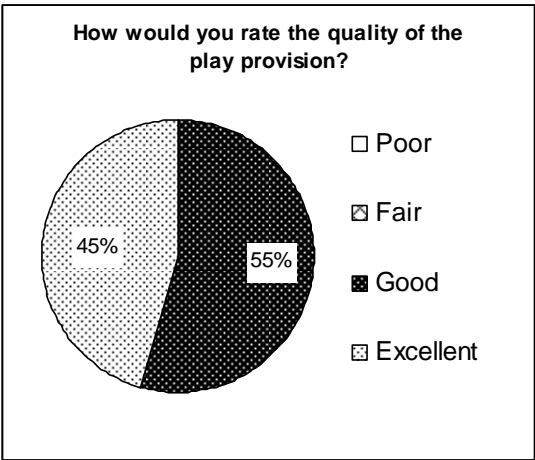
Reported ASB/crime/vandalism before and after

Using information provided by the information officer for Public Safety and Housing using data from It's Your Call, Police ASB data and Police Crime data, it would seem that between April to September 2008 there were 2 incidents - but it looks like 1 in

the actual park. Between April and September 2009 there were 5 incidents but it looks like 2 in the actual park and between April and September 2010 there were 3 incidents but it looks like 2 in the actual park. This includes environmental issues such as fly-tipping, ASB and crime. This would suggest that during the summer months, which are peak times for issues in parks, there was no substantial difference before and after the play area was refurbished and improved.

What people tell us

A basic survey (Appendix A) was carried out to gather people opinions on the new play facility. These were conducted by the Play Strategy Manager and the Park Development Officer for this neighbourhood. The following information is based o 1 responses so only provides a snap shot, but was split between parents and children 6:5.



As the charts show the play area has been very positively received and is appreciated by the people who use it. There were very few negative comments to the play area – in fact some people had travelled to the park. What has been appreciated are the opportunities for all age groups, that it offers progression for children who play there.

Some of the comments were:

“I enjoyed the cross scales very much”

“Was not aware of this play area for a long time. Live very close.”
“Needs checking frequently for litter, animal mess, syringes, beer cans etc.”

Involvement in the development of the site

Due to the very tight timescales that were required for the Playbuilder funding the consultation process was necessarily truncated. However the model process was still followed. Groundwork Coventry and Warwickshire led on the consultation process, which involved open events on site, as well as children from the local school Spon Gate and Hearsall Primary. Despite the short time available the consultation with the public covered a good cross section of local families. However, what maybe wasn't as well covered was the input from technical officers in terms of the design. This should ideally be done before being taken to the public so any technical changes can be made before the public consultation takes place.

Site issues

The original play area consisted of play equipment within a fenced area, aimed at younger children, there weren't any opportunities for the over 8's or anything that offered challenge. Although the design principles adopted by the Play Strategy would imply that the fencing should come down, due to the lack of time for consultation available, it was decided to retain the fencing that was there, but not to increase or fence off any new play space. There has not been any concerns raised about the area that isn't fenced – however younger children are predominantly in the fenced off area – which could be due to the fact that the play opportunities for that age range are located there.

There were no specific site issues or concerns with this site before work started. There were some issues with the installation of one of the larger pieces of equipment and some fire damage to the equipment and safety surface during and soon after installation. This has resulted in a domehawk camera being installed There has also been some dog chew on the cross scales, but again this was something that was present before the development. Anecdotal evidence would suggest that there are issues with drinkers and drug users; however these have not been backed up with data from the police.

What does this information tell us?

Positives

The refurbishments to the park have been very popular and successful with users of the park. There has been no significant increase in anti-social behaviour or crime recorded and an increase in usage.

From talking to users and other people who live locally the park presents the impression that it is very well used and enjoyed and valued by a large cross section of the local community.

Negatives

The main issue with this project has been the consultation. This was partly due to the need to shorten the desired timescales, but also potentially a lack of communication between the officers involved from different directorates. As a result emphasis was

placed on achieving consultation with the users and potential users of the site rather than with officers with a working knowledge and understanding of the site.

How can we use this information for the future?

Community involvement

There was limited community engagement on this site due to the time constraints – however Groundwork delivered the methodology required but truncated to fit into the required timescales. Ideally adequate time should be made to provide an in depth consultation process where local people can be involved at all stages.

Also Council officers and other partners should be involved in the project team to be able to support the technical process of the project, but also to be able to share local intelligence on the space, as well as that gathered from the community

Design

Over all the design has been a success. Despite the pragmatic decision to retain the fencing around the toddler play equipment the play space within the park has spread out and children and young people are no longer confined to a specific corner. The play area caters for all ages and uses a combination of fixed equipment as well as natural features.

Maintenance

The handover between the contractors and Streetpride has been fairly smooth with no significant problems reported.

Summary of findings and recommendations from Play Strategy Case Studies – January 2011

Background

As part of the evaluation of the Play Strategy, four sites were identified for case studies, each chosen as an example of a different "type" of site. The case studies looked at information available, including feedback from users, project team and the observation and consultation reports undertaken by Groundwork. This information was then used to identify what had worked well and also areas for learning. These have been summarised and turned into recommendations below.

Community involvement

At Canley Brook the community involvement worked well, especially in terms of children and young people. However there is some evidence to suggest that not all of the community, especially those who don't participate in existing groups, were not aware of the details of the project and therefore the play area did not meet their expectations. As from other case studies the presentation of designs are not always easily understood by the general public.

The project at Parkwood Meadows had a fundamental effect on how the play strategy developed its engagement process. The lessons learned and the methodology used was adopted for the remainder of the Play projects.

At Primrose Hill the tile project has been very successful – local children and young people were involved in creating tiles that reflected the character and history of the park. These were then installed as part of the wall feature. There has been very little vandalism to the feature and the children were very pleased that they had created something in the park. This project was supported through a Warwickshire Wildlife Trust SITA Greenprints project. This is an excellent way of getting local people involved in the developments.

There needs to be better explanation of the architectural designs. Local people do not necessarily understand architect's drawings. Cross sections and sketches would be more effective at portraying what the eventual design will look like. It is likely that people commented on the elements going into the design, rather than the design over all. This led to a difference in expectation on the design.

Also the difficulties of engaging with such a diverse and changing population should not be underestimated. Some people felt that although a lot of effort had gone into engaging with local people it hadn't been totally successful.

At Sovereign Row there was limited community engagement on this site due to the time constraints – however Groundwork delivered the methodology required but truncated to fit into the required timescales.

Recommendations for Community Involvement:

1. Council officers and other partners should be involved in the project team to be able to support the technical process of the project, and also to be able to

share local intelligence on the space, as well as that gathered from the community

2. There should be consideration taken into how designs and plans can be communicated more easily rather than reliance on 2D bird-eye view plans. Cross sections, sketches and 3D models should be considered.
3. Costs for the consultation process should be built into the budget. This needs to be included in all play capital projects and should be considered as "fees".
4. The process developed through the Play Strategy should be adopted as Council policy for engaging communities in the development of play areas in future.
5. A project to involve the community should be included in each play development design, where local people can create part of the design. This could include signage, planting, art work etc..
6. Clearer explanation and communication about natural play elements would support the understanding of a different approach to designing play spaces – linking with local stay and play or nurseries for example.
7. Adequate time should be made to provide an in depth consultation process where a broad cross section of local people can be involved at all stages.

Design

At Canley Brook the design fitted well in terms of the location and budget available, providing a variety of play experiences in a small "doorstep" facility.

As an experiment in design, Parkwood Meadows features natural play in its most extreme. The design suited the site and the circumstances. If there had been an existing play provision on this site, this design would not have been suitable.

In terms of design for play Primrose Hill was considered as a whole, rather than just allocating a specific area for play provision. This has meant that there are play opportunities throughout the park and children and young people are not consigned to a "designated" area. Bringing the hill into use has been particularly popular.

- Planting schemes. The planting schemes delivered by the design were too complex for this kind of site. The plants have not on the whole survived, they have been vandalised or stolen. However the defensive planting scheme against local residents back walls has addressed some concerns about anti-social behaviour. One suggestion is that the planting is staggered to allow time to settle in.
- Loose fill. It is important to consider the appropriateness of loose fill to a particular site. At this site it offers an additional play feature as well as a safety surface. However there is a considerable amount and can lead to difficulties in maintenance. Loose fill should be appropriately contained.
- Natural play elements. There should be support for local users on how to get the best benefits from the whole space rather than just the fixed equipment. There have been concerns raised that there is nothing for younger children. The design has larger fixed equipment for older children and young people and the play opportunities for younger children come from the natural play elements. It should be noted that if play equipment is removed from an existing site, something comparable should be put back in. Also if mixtures of fixed and natural play elements are used, these should both cater for all age ranges.

Over all the design at Sovereign Row has been a success. Despite the pragmatic decision to retain the fencing around the toddler play equipment the play space within the park has spread out and children and young people are no longer confined to a specific corner. The play area caters for all ages and uses a combination of fixed equipment as well as natural features

Recommendations for Design:

8. Play areas should cater for all ages and use a combination of fixed equipment as well as natural features for all ages.
9. Interpretation boards or signage could support local people's understanding of natural play features and their play value.
10. The design should suit the location and local circumstances of all sites. This should include the choice of planting schemes and safety surfacing, as well as choice of fixed equipment
11. Where budget allows there should be play opportunities throughout the park or space so children and young people are not consigned to a "designated" area.

Risk management

At Canley Brook the location of the play provision identified certain risks, such as a wooded location and proximity to the river. However these were built into the design, current activity on the site was accounted for and risk managed accordingly. Concerns about ASB have been realised, but there should be an awareness made with local residents about the importance of reporting incidents so they can then be acted on by the appropriate service. Information from the police would suggest that the situation hasn't become any worse, but there needs to be data gathered to monitor the situation.

The site at Primrose Hill has taken a risk benefit approach to the play element. There are some risky elements which are unusual and fairly unique to Coventry. Also the fencing that was around the previous play area has been taken down. This has not caused significant issues on this site.

Recommendations for Risk Management:

12. A risk benefit approach should be taken towards play. Risk is a key play feature and the benefits to children should also be considered when assessing risk.
13. Local residents should be informed of the importance of reporting any incidents such as vandalism, litter and ASB, to the appropriate service. Methods to do this should also be communicated during the engagement process.
14. Existing risks on site should be assessed and built into the design; current activity on the site should be accounted for and risk managed accordingly.

Maintenance

There are some concerns over maintenance of the site at Canley, in terms of clarity regarding who is responsible for the maintenance and management of the site. The fact that there could be no bin on site due to budget restraints is worrying, reflected in anecdotal evidence of litter on the site.

Due to the play features at Parkwood Meadows mainly being reliant on natural features the maintenance of this site has been horticultural but has posed some complexities as it is maintained not as a play area, but as a green site.

There are potentially some issues with maintenance at Primrose Hill, as the number of users has increased, which in itself creates more litter and more wear and tear. Also the nature of the site and the area which it is located means it is vulnerable to vandalism, although no serious incidents have been recorded so far.

The handover between the contractors and Streetpride at Sovereign Row has been fairly smooth with no significant problems reported.

Recommendations for Maintenance:

15. Responsibility for maintenance and management of the site should be agreed by all parties during the planning stages if not before.
16. All play areas should have provision for litter collection.
17. It should be accepted that maintenance costs will increase during the early stages of a new play area being opened.

Woodland Areas

Is there anything that can be learned from the approach taken specifically for woodland play areas in the future?

- Overall there has been delivered a good quality play provision considering the budget and site restraints. There was a good engagement process and local children have been closely involved, especially the school and children's centre. The involvement of a community artist has further enhanced this process. Already active local residents have been involved and recognition needs to be made of the difficulty in engaging with local people in areas such as Canley.
- Choice of contractor should also be carefully considered when working on tricky locations within woodland to ensure smooth delivery of the construction work.
- Issues about landownership and responsibility for on-going maintenance should be clarified and agreed before the design process as these could have implications for the design.
- Partnership working is essential, as is linking with existing networks and partnerships. However this should not negate the need for further community development.
- A sensible risk management approach should be taken, recognising that local children will already be using such areas for play.
- Anti-social behaviour concerns should be considered but should not rule out the use of this kind of space for play, especially as woodland sites are anecdotally used for drinking and fire-setting and other anti-social behaviour.

Cabinet
Council

30th August 2011
13th September 2011

Name of Cabinet Member:

Cabinet Member (Neighbourhood Action, Housing, Leisure and Culture) – Councillor Skipper

Director Approving Submission of the report:

Director of Community Services

Ward(s) affected:

All

Title:

Response to consultation paper – 'Implementing social housing reform: directions to the Social Housing Regulator'

Is this a key decision?

No

Executive Summary:

This is a response to a Government consultation on draft directions proposed to be given by the Secretary of State for Communities and Local Government to the Social Housing Regulator. The Regulator will set standards for Registered Providers of social housing in accordance with these directions. The directions are needed in order to implement some elements of the Government's planned reforms to social housing.

The areas on which the Secretary of State proposes to direct the Social Housing Regulator are:

- *Tenure Reform*: to allow social landlords to issue flexible tenancies.
- *Mutual Exchange*: to require landlords to enable access to internet-based mutual exchange schemes.
- *Tenant Involvement*: to strengthen landlord's accountability to tenants and support the Tenant Cash-back model.
- *Rent*: to make changes to reflect the introduction of the 'Affordable Rent' model.
- *Quality of Accommodation*: to clarify that providers are expected to maintain their stock at a decent level.

The Council's recommended response is provided in Appendix 1. The consultation paper was released on 7th July 2011 and the deadline for responses is 29th September 2011.

Recommendations:

Cabinet is asked to recommend that Council approve the consultation response in Appendix 1.

Council is asked to approve the consultation response.

List of Appendices included:

Appendix 1 – Consultation Questions and Proposed Response

Other useful background papers:

Implementing Social Housing Reform: directions to the Social Housing Regulator - Consultation

Available on the Communities and Local Government website:

<http://www.communities.gov.uk/publications/housing/socialhousingregulator>

Local Decisions: a fairer future for social housing

Available on the Communities and Local Government website:

<http://www.communities.gov.uk/publications/housing/socialhousingreform>

Response Paper to CLG Local Decisions – A Fairer Future for Social Housing Consultation

Available on CMIS – this report was considered at Cabinet on 4th January 2011 and at Council on 11th January 2011.

Local decisions: next steps towards a fairer future for social housing - Summary of responses to consultation

Available on the Communities and Local Government website:

<http://www.communities.gov.uk/publications/housing/localdecisionsresponse>

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?

Yes - 13th September 2011

Report title:

Response to consultation paper – 'Implementing social housing reform: directions to the Social Housing Regulator'

1. Context (or background)

- 1.1 On 7th July 2011, the Government published a consultation on draft directions proposed to be given by the Secretary of State for Communities and Local Government to the Social Housing Regulator. The Regulator will set standards for Registered Providers of social housing in accordance with these directions. The directions are needed in order to implement some elements of the Government's planned reforms to social housing.
- 1.2 The areas on which the Secretary of State proposes to direct the Social Housing Regulator are:
- *Tenure Reform*: to allow social landlords to issue flexible tenancies.
 - *Mutual Exchange*: to require landlords to enable access to internet-based mutual exchange schemes.
 - *Tenant Involvement*: to strengthen landlord's accountability to tenants and support the Tenant Cash-back model.
 - *Rent*: to make changes to reflect the introduction of the 'Affordable Rent' model.
 - *Quality of Accommodation*: to clarify that providers are expected to maintain their stock at a decent level.
- 1.3 'The Regulator' is currently the Tenants Services Authority (TSA) however, the TSA will be abolished and responsibility for regulation will be transferred to the Homes and Communities Agency (HCA) from April 2012.
- 1.4 The deadline for consultation responses is 29th September 2011.

1.5 Tenure Reform

Registered providers have flexibility in statute to offer a range of tenancies; however they are constrained by the Regulator's standards. The current standard requires registered providers to *'offer and issue the most secure form of tenancy compatible with the purpose of the housing and the sustainability of the community'*. This means that the majority of tenancies granted by RPs are periodic assured tenancies, commonly known as 'lifetime tenancies'. The Government wants registered providers to be able to offer shorter, fixed term tenancies, which they are calling 'flexible tenancies'.

The proposed change to the direction is: *"that registered providers offer and issue tenancies which are compatible with the purpose of the housing, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock"*. This removes the requirement for registered providers to offer the most secure tenancy.

The draft direction also proposes to require registered providers to *"publish clear and accessible policies which outline their approach to tenancy management"*. The expectation is that registered providers will pay particular regard to the needs of more vulnerable tenants and their children.

Following a letter published by Grant Shapps (Housing Minister) on 28th July, three weeks into the consultation period, the draft direction will require the Regulator to allow registered providers to issue tenancies for a minimum fixed term of five years, or in exceptional

circumstances, a minimum of two years. The registered provider will be required to publish the circumstances where a two-year tenancy will be issued.

The draft direction makes it clear that a flexible tenancy may be preceded by a probationary tenancy of up to 18 months.

The standards will require a guarantee of a tenancy of 'no less security' for existing social tenants who move to another social home. If an existing social tenant chooses to move to an Affordable Rent home, the registered provider will be able to offer either the same security or a flexible tenancy with a fixed term.

1.6 *Mutual Exchange*

The standards will require registered providers to subscribe to an internet based mutual exchange service. Registered providers should proactively promote the option of mutual exchange and provide support to those without computer/internet access or who may not be able to use a computer without assistance.

1.7 *Tenant involvement and empowerment*

The draft direction includes three recommendations from the Review of Social Housing Regulation; there should be a clear expectation in regulation that tenants are able to scrutinise registered providers' performance; that registered providers should welcome scrutiny via a tenant panel (or equivalent group); and that registered providers should provide timely, useful performance information to tenants in order to support effective scrutiny.

The draft direction also includes the Tenant Cashback model, giving tenants opportunities to be involved in the commissioning or carrying out of routine repairs, and to share in any financial savings made as a result.

1.8 *Rents*

The proposed direction will update the standards on rents to reflect the new 'Affordable Rent' model, which will introduce rents of up to 80% of market rents. Properties are to be treated as 'Affordable Rent' where they are provided as part of a housing supply delivery agreement with the Homes and Communities Agency under the 2011-15 Affordable Housing Programme.

Affordable rents are outside of the Government's rent restructuring policy and the social rent formula. The formula for traditional social rents will remain unchanged.

Affordable rent properties are subject to separate requirements relating to initial rent setting (up to 80% of market rent), annual increases and periodic rebasing. The rent will increase each year by RPI +0.5% and will be re-set based on a new valuation each time the accommodation is let to a new tenant or re-let to the same tenant.

1.9 *Quality of Accommodation*

Minor revisions to the 'existing quality of accommodation' direction are proposed to reflect the fact that the original deadline for compliance with the Decent Homes Standard (31st Dec 2010) has now passed.

The proposal is to remove the fixed date for compliance. The standard would then work in the same way as the other standards, where compliance is required with immediate effect.

Registered providers will be expected to maintain their stock at a decent level on an ongoing basis.

The Regulator would have scope to grant a temporary exemption for specific properties where the requirements of the standard should be met by an agreed date.

2. Options considered and recommended proposal

- 2.1 Cabinet is asked to recommend that Council approve the consultation response in Appendix 1.
- 2.2 Council is asked to approve the consultation response.

3. Results of consultation undertaken

- 3.1 Due to timescales, there has been no specific consultation for this report. The response is a City Council response; any other interested parties are able to respond directly to the Government.

4. Timetable for implementing this decision

- 4.1 The approved consultation response will be sent to the Department for Communities and Local Government to meet the deadline of 29th September 2011.

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

The Council is no longer a provider of social housing since stock transfer in 2000 when the Council's housing was transferred to Whitefriars Housing Group, now part of WM Housing Group. Therefore, the draft directions do not have direct financial implications for the Council. There may be indirect financial implications if households that do not have their flexible tenancies renewed then seek homelessness assistance from the Council, if assistance given by the registered provider does not result in them being able to resolve their own housing needs.

5.2 Legal implications

The Council is no longer a provider of social housing since stock transfer in 2000 when the Council's housing was transferred to Whitefriars Housing Group, now part of WM Housing Group. Therefore, the draft directions do not have direct legal implications for the Council.

6. Other implications

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

As detailed in the proposed response to the consultation in Appendix 1, there are concerns that certain aspects of the draft directions, in particular the introduction of flexible tenancies, may have negative effects for individual households and for the stability of communities. Other aspects such as mutual exchange will contribute to mobility and the ability of households to exercise housing choice.

6.2 How is risk being managed?

The main risk to the Council of the proposed direction is the potential for households to approach the Council for homelessness assistance if they do not have a flexible tenancy renewed. The draft directions include the need for registered providers to have policies to assist households in this situation. At this stage it is not possible to quantify this risk, as registered providers have not published their policies on the assistance they will provide. The Housing Team will liaise closely with partner registered providers to ensure that their policies are robust and appropriate, maximising the ability of households to resolve their own housing needs.

6.3 What is the impact on the organisation?

The only organisation directly affected by the proposals in the consultation is the Social Housing Regulator. Two groups will be indirectly affected, via the standards set by the Regulator in accordance with the directions: registered providers and their social housing tenants.

6.4 Equalities / EIA

Communities and Local Government have published an Equalities Impact Assessment of the Affordable Rent Policy which is available on the website:
<http://www.communities.gov.uk/publications/housing/affordablerentpolicy>

6.5 Implications for (or impact on) the environment

No specific impact identified

6.6 Implications for partner organisations?

The only organisation directly affected by the proposals in the consultation is the Social Housing Regulator. Two groups will be indirectly affected, via the standards set by the Regulator in accordance with the directions: registered providers and their social housing tenants.

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Enquiries should be directed to the above person.

Contributor/approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Sara Roach	Assistant Director	Community Services Directorate	4 th August 2011	4 th August 2011
Other members				
Names of approvers for submission: (officers and members)				
Finance: Diane Jones		Finance & legal	27 th July 2011	4 th August 2011
Legal: Christine Forde		Finance & legal	27 th July 2011	4 th August 2011
Director: Brian Walsh		Community Services	27 th July 2011	4 th August 2011
Members: Councillor Skipper			27 th July 2011	4 th August 2011

This report is published on the council's website:

www.coventry.gov.uk/meetings

Appendix 1 – Consultation Questions and Proposed Response

Coventry City Council objects to the move away from lifetime tenancies towards fixed term tenancies in the social sector. This has negative implications for creating and maintaining balanced, sustainable communities and will reduce stability and security for individual households and families. Social housing is a key part of the housing landscape and should continue to play an integral role in the mixed housing economy. In addition, housing is a human right that must be protected.

In terms of the impact on tenants, introducing fixed term tenancies will remove the stability and security that social tenants currently benefit from. Security and stability allow tenants to put down roots in a community, find employment, and acts as a platform for households to realise their aspirations. There is clear evidence that changing schools and having education disrupted can lead to poor educational outcomes; tenants may have to commute long distances if they are required to find a new home when their circumstances improve; and it could act as a disincentive for unemployed households to seek paid work if they might lose their tenancy as result.

It is important that social/affordable housing is not seen purely as a 'stepping stone' or transient tenure, but is also a valuable tenure in its own right. For many tenants it is the most appropriate form of tenure in the long term.

Question 1:

Does the draft direction on tenure set out the relevant factors that registered providers should consider when deciding what type of tenancy they should offer and issue?

Coventry City Council objects to registered providers offering anything less than the most secure tenancy for households in social and affordable rent properties.

If the directions to the Social Housing Regulator include offering less secure, fixed term tenancies, there should be stronger guidance to ensure that the type and length of the tenancy is suitable for the household's needs. There should also be robust safeguards for vulnerable households.

The draft direction states that tenancies should be compatible with "the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock". Coventry City Council believes that the needs of the household and the sustainability of the community should be the foremost consideration, above other considerations, and this should be more explicit.

The review at the end of the tenancy period is a particularly vital part of the process. Again, if the directions to the Social Housing Regulator include offering less secure, fixed term tenancies, then there should be robust guidance on the tenancy renewal criteria and the assistance given to households if their tenancy is not renewed. Safeguards should also be in place to ensure that the decision to end or extend the tenancy term is made with the household's needs as the foremost consideration.

Question 2:

Does the draft direction on tenure set out the right minimum requirements for a registered provider's tenancy policy?

The draft direction identifies most of the main points that need to be addressed in a registered provider's tenancy policy. However, the need for the registered provider's policy strategy to 'have regard' to the local authority's Strategic Policy on Tenancies should be included.

The Council is concerned that the draft direction requires the Regulator to ensure that registered providers have clear tenancy policies, without anything to ensure that these policies actually do provide additional safeguards for vulnerable households, or have suitable criteria for tenancy types, length of fixed terms, or circumstances where tenancies may or may not be renewed.

Question 3:

Does the draft direction set out the right minimum protections for tenants of registered providers?

Coventry City Council is fully supportive of protecting the security of tenure of existing social housing tenants but believe that this security should also be protected if an existing social housing tenant moves from a social rent property to an affordable rent property, especially if the move is necessary because of a change in the housing needs of the household or any vulnerability.

Question 4:

Do you agree with the principle and detail of our proposed direction on mutual exchange?

Coventry City Council supports the principle of the direction concerning mutual exchange, but there are some concerns about the detail. The focus on internet-based schemes will disadvantage those that have no internet access or are unable to use a computer. The direction partly addresses this by stating that RPs should offer 'reasonable support', but the Council believe that this should be strengthened further to state that those that require support and assistance will receive support that is appropriate to their needs.

Question 5:

Do you agree with the principle and detail of our proposed revisions to the direction on tenant involvement?

Coventry City Council is supportive of greater tenant involvement and empowerment, and supports this section of the draft direction.

Question 6:

What type of models for involving social tenants in repair and maintenance services are registered providers likely to offer, how many tenants might participate in these and what costs and benefits might they result in?

Coventry City Council has no comment to make on this question.

Question 7:

Do the proposed revisions to the rent direction adequately reflect the introduction of Affordable Rent?

Yes, the proposed revisions adequately reflect the introduction of Affordable Rent.

Coventry City Council has concerns regarding the future calculation of 'affordable rent' levels. The revision states that the 'affordable rent' rate will be set when the property is let, based on a valuation in accordance with RICS methods, and will increase each year by no more than RPI +0.5%.

Whilst the rent would be reset based on a new valuation each time the property is let to a new tenant or re-let to the same tenant, it is concerning that there is no cap or time limit set on the period that the 'affordable rent' can be increased by RPI +0.5%.

If the household's circumstances mean that a longer term tenancy is granted, it is possible that the 'affordable rent' could rise to a level which is above 80% of the market rent, or even up to and over full market rent, depending on the rate of increase of the market rental value of the property. The Council would like to see a maximum period for which the 'affordable rent' can increase without being re-evaluated against market rents, in order to avoid this scenario.

Question 8:

Do you agree with the proposed revisions to the Quality of Accommodation direction to reflect the expiry of the original target date for compliance?

Coventry City Council's housing service strives 'to ensure decent homes, housing choice, and support for Coventry citizens'. The Council is supportive of the revisions to ensure that compliance with the Decent Homes Standard is part of the Regulator's standards in the same way as the other standards.

Question 9:

Energy efficiency is implicit in the revisions to the Quality of Accommodation Direction; should we make it more explicit?

The proposed direction states that the Regulator must have regard to the Decent Homes Guidance in setting the Quality of Accommodation Standard. This guidance is already clear about what is required; therefore energy efficiency does not need to be made more explicit in the revisions to the Quality of Accommodation Direction.

Cabinet
Council

30 August 2011
13 September 2011

Name of Cabinet Member:

Cabinet Member (Policy, Leadership and Governance) – Councillor J. Mutton

Director Approving Submission of the report:

Assistant Chief Executive

Ward(s) affected:

City-wide

Title:

Government Consultation - Responding to the "*Open Public Services*" White Paper

Is this a key decision?

No

Executive Summary:

Central Government is undertaking a listening period from July-September 2011 asking for views on the proposals in the "*Open Public Services*" White Paper which was published on 11 July 2011. This report sets out a proposed response from Coventry City Council to the Open Public Services White Paper.

Recommendations:

Cabinet is recommended to:

- 1) Agree the proposed response to the "*Open Public Services*" White Paper set out in appendix 1.
- 2) Recommend this response to Council for approval

Council is recommended to:

- 1) Approve the proposed response to the Open Public Services White Paper set out in appendix 1 and submit this response to Central Government

List of Appendices included:

Appendix 1 – response to the "*Open Public Services*" White Paper

Other useful background papers:

Open Public Services White Paper – Cabinet Office

<http://www.cabinetoffice.gov.uk/sites/default/files/resources/open-public-services-white-paper.pdf>

Open Public Services Web site

www.openpublicservices.cabinetoffice.gov.uk/

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?

Yes

Tuesday 13 September 2011

Report title: Responding to the "*Open Public Services*" White Paper

1. Context (or background)

- 1.1 The Government issued the "*Open Public Services*" White Paper on 11 July 2011 and established a "*listening period*" for comment which ends on 30 September 2011. The listening period is aimed at everyone including service users, public sector workers, members of the public and independent providers and will include public events although these were not listed on the Open Public Services website when this report was written.
- 1.2 The "*Open Public Services*" White Paper does not contain detailed proposals for any specific legislative change, setting out instead the general direction of the government with examples from its existing policy and activity. The White Paper asks for comments on a range of issues arising from its proposed policy framework rather than on any specific detailed proposals, and acknowledges that many of the ideas in the White paper are in earlier stages of development - rather like a traditional "green paper"
- 1.3 Following its listening period the Government intends to set out a programme of work to implement the open public services agenda. In November it will set out proposals for this including proposals for legislation and commitments will be reflected in Government departmental plans which will report on progress from April 2012 onwards.
- 1.4 The content of the White Paper makes it difficult to prepare a comprehensive response from the Council. Although a general policy framework for the provision of public services is clearly of interest to local authorities, local people and local organisations. It is only through knowing more detail about the implementation of the policy framework, including any subsequent legislative changes, that it will be possible to understand fully and to quantify the impact the proposals will actually have on the provision of local public services and the people who use them.
- 1.5 It is within this context that a proposed response is set out in appendix 1.

2. Options considered and recommended proposal

- 2.1 The Council does not have to respond to the "*Open Public Services*" White Paper, particularly as the proposals in the paper relate to a policy framework rather than specific legislative changes and the government has set a "*listening period*" rather than undertaking a more formal consultation. The Government has said that it will set out the results of the listening period and the actions it is going to take, including any proposed legislative changes, in November 2011. However, it is not clear whether any further opportunities for comment will be available at that time so it is recommended that the Council responds to the Government on the "*Open Services*" White Paper as set out in appendix 1.

The Open Public Services White Paper

- 2.2 The "*Open Public Services*" White Paper was originally expected in the autumn of 2010 and it is linked with other Government policy development and legislation changes including the Localism Bill; schools and health policy.
- 2.3 The Government's stated purpose is "*to make sure that everyone has access to the best public services and that the best becomes better still*". It aims to do this through "*a comprehensive policy framework across public services*" set out in the White Paper with the recognition that not all of the proposed policy framework can be achieved at once. To achieve the Government's aspirations it would require extensive de-regulation away from central and local government as it currently stands and to transfer control and decision making to local people and organisations in whatever form is necessary.

2.4 One of the key concepts driving Coalition Government policy is the idea that public services should not necessarily be delivered by the public sector and that ensuring the diversity of provision is critical to improving public service. The White Paper states that the Government is not looking to give preference to any particular sector, that "*strong local government is at the heart of our reforms*" and recognises that councils have made more progress in commissioning than the rest of the public sector.

2.5 The White Paper sets out five principles for modernising public services:

- 1) Where ever possible **increase choice**;
- 2) Public services should be **decentralised to the lowest appropriate level**;
- 3) Public services should be **open to a range of providers**;
- 4) **Ensure fair access** to public services;
- 5) Public services should be **accountable to users and to taxpayers**.

2.6 The Government divides public services into three categories:

- **Individual services** – personal services – for example in education, skills training, adult social care, childcare, housing support, individual healthcare – that are used by people on an individual basis
- **Neighbourhood services** – services provided very locally and on a collective rather than an individual basis – for example the maintenance of the public realm, leisure and recreation facilities and community safety.
- **Commissioned services** – local and national services that cannot be devolved to individuals or communities such as tax collection; prisons; emergency healthcare or welfare to work.

2.7 Through applying the five principles to these three service categories the Government aims to do the following: improve choice for individuals with money flowing to providers who meet these choices; give powers to neighbourhoods to take control of "very local" services such as street improvements; recreational services; and parking; give local authorities more freedom to innovate by decentralising funding and the delivery of local services; enable public sector staff to innovate and start their own enterprises; and give opportunities to independent providers of all sizes and from any sector to compete to deliver public services.

2.8 The White Paper sets out its proposals for each of these three service categories with a range of questions for each along with a fourth set of questions on ensuring diversity of provision.

Responding to the Open Public Services White Paper

2.9 It is proposed that the Council should submit an overall response to the White Paper and to respond to each of the four specific areas upon which that comment have been sought, and responding to the questions set out in the White Paper.

2.10 The response set out in appendix 1 includes the following key points:

- Reinforcing the view that local government is ahead of the rest of the public sector in its open commissioning that many local public services are already delivered by non-public organisations
- Coventry City Council has a "mixed economy" approach and has history of managing and developing markets and ensuring value for money through the provision of services through a wide range of service providers.

- Coventry City Council already views all of its services through its abc programme of fundamental service review that ensures rigour is applied to existing services and future commissioning, including the use of external challenge.
- Continuity and secure provision of public services and protection of service users, particularly the most vulnerable people is vital along with the management of risk – the White Paper does not address this sufficiently
- The need for service data to be easily understood by service users to inform their choices and avoid "spurious choice" ie a limited range of providers offering essentially the same service
- The need to avoid duplication; confusion and cost through the introduction of additional layers of local services commissioning
- The risk of introducing bureaucracy by central Government regulation and prescription of local commissioning of services – local authorities are best placed to determine and ensure the delivery of local services and do not need further regulation
- Public sector services can be more efficient and effective than their private sector equivalent
- Coventry City Council already works closely with third sector organisations through the Coventry Compact and is developing new ways of working
- The need for effective accountability, governance arrangements and to ensure best value for money.

3. Results of consultation undertaken

- 3.1 This is a formal response from the Council to central Government. The timing of the release of the paper and the closing date of 30 September has meant that it has not been possible to consult meaningfully with partners organisations about the submission of a response.

4. Timetable for implementing this decision

- 4.1 Any response to the White Paper must be submitted to the Cabinet Office by 30 September 2011 through the Open Public Services website. The Government intends to set out its next steps, including proposals for legislative change, in November 2011 and report on its progress in implementation of these proposals from April 2012.

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

There are no direct financial implications for the Council from the submission of this response to the "*Open Public Services*" White Paper. It is expected there will be financial implications from the implementation of specific Government proposals on the cost of providing local services, along with implications for the council's commissioning and procurement processes, but any financial costs or benefits can only be calculated when further detail is set out by the Government in November 2011.

5.2 Legal implications

There are no direct legal implications for the Council from the submission of the proposed consultation response. However, the development of the Government's proposals will require legislative changes and some are already in process such as the Localism Bill which contain the principles of community empowerment, neighbourhood planning, general power of competence, making available assets of community value. There is also the Health and Social Care Bill with personal budgets and direct payments to service users. Further legislative changes will be set out by the Government from November 2011. Compliance with the requirements of the Equality Act 2010 will also be required once further information on the proposals has been provided.

6. Other implications

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

Responding to the Open Public Services White Paper will not contribute directly to the Council's key objectives. However the White Paper specifically addresses the future provision of local public services and how these services should be delivered and so potentially has implications on what the Council can achieve itself and in its partnership working.

6.2 How is risk being managed?

Responding to the "*Open Public Services*" White Paper does not require risk management. However the proposed policy framework for public services in the future is likely to have a considerable impact on the management of risk for the Council in future, including the transfer of risk to providers and individuals.

6.3 What is the impact on the organisation?

There is no direct impact to the organisation from the submission of this proposed response. However the detailed implementation of the White Paper could have an impact on the way that the council commissions, provides and procures its services; the provision of information; the role of elected members and local governance and implications for members of the workforce.

6.4 Equalities / EIA

This report is a response to Government consultation so an EIA has not been undertaken by the Council at this stage. The aim of the White Paper is to make sure that everyone has access to the best public services and has fairness as one of its five principles. It will not be possible to calculate the likely impact on local people until there is more information available about the detailed implementation of the proposals.

6.5 Implications for (or impact on) the environment

There are no implications for the environment at this stage.

6.6 Implications for partner organisations?

There is no direct impact from this report. The "*Open Public Services*" White Paper has potentially considerable impact on third sector organisations and private providers of services. Although the aim of the Government is to diversify the range of public services providers, concerns about the proposals in the White Paper have been raised by a number of national organisations including: Co-operatives UK; the Social Enterprise Coalition; Trade Unions and the CBI. Although these concerns vary there is a general view that the "*devil is in the detail*" and that it is the implementation of the policy framework and clarity of what this will mean that is key to understanding the implications of the White Paper.

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www.coventry.gov.uk/councilmeetings

Proposed Response to the Open Public Services White Paper

As the White Paper confirms, local government has a wide experience of commissioning services that meet local needs - services ranging from the provision of highways and other major public building works to the provision of culture and leisure services and individual social care.

Services commissioned by local authorities like Coventry City Council are provided through all sectors: from in-house provision; large and small private companies and a range of third sector organisations from large national charities to small social enterprises. Indeed local government commissions more of its services through non-public sector providers than most other areas of the public sector – for example nationally two thirds of local authority funded care is provided by non-public service organisations.

Coventry City Council has a history of delivering its local services through a "mixed economy" approach to ensure effective service delivery and value for money for Coventry people. For the past two years this has been strengthened by its "abc" of fundamental service reviews – applying a robust methodology to all its services to ensure that they meet local people's needs; are customer focused and are delivered in the most efficient and effective way.

Although some of the content of the White Paper is helpful, the Council is concerned that the proposals will impose a national framework and associated bureaucracy crafted to suit central Government and areas of public service that have not yet embarked on widening provision, rather than enabling local areas to determine what best meets local needs.

Individual services

Coventry City Council is committed to increasing independence and personal choice, including personal budgets. However the absolute distinction the White Paper makes between "individual" and "commissioned" services is somewhat unhelpful as local authorities will need to continue to play their role in ensuring that an individual's choices can be delivered in a joined up way, to maximise effectiveness and value for money from public services and to ensure support for individuals to exercise their choice.

- *How best, in individual services and on a case-by-case basis, can we ensure that people have greater choice between diverse, quality providers?*

Experience has shown that the unmanaged free market does not necessarily provide real choice for individuals in a way that meets their specific needs. To ensure that a diverse range of providers continue to remain active in a public service area will require proactive local management - through imaginative commissioning allied to personal decisions. However it should be remembered that for many people the ability to choose from a wider range of suppliers is less important to them than the quality of the service that they receive.

- *Consistent with the Government's fiscal plans, what further opportunities exist to target funding to help the poorest, promote social mobility and provide fair access to public services?*

There are clear tensions between the provision of choice and the ability to achieve maximum efficiency through economies of scale. The reduction in public spending, and in particular the reduction of Area Based Grant and similar funding regimes targeted on disadvantage has reduced the resources available to service providers to achieve better equality outcomes. The provision of support to individuals making choices about the public services available to them will be crucial for those who most need to access such services – such as families facing multiple problems. This advice and support should be focused on the individual and cover all the services that they need to access across public sector areas and will require funding.

- *Are there additional areas where personal budgets would be appropriate and could existing initiatives on personal budgets be accelerated?*

Coventry City Council is committed to rolling out personal budgets for all users of social care by 2013 and would be interested in seeing how this could be extended to include other complementary services to meet an individual's needs in a joined up way. It is important that this does not become a plethora of benefits/budgets that would need to be applied for and managed separately with a range of public services.

- *How can the principle be implemented that providers (from whichever sector) who are receiving public money for individual services should collect satisfaction data in a standardised form to enable comparison and put it into the public domain?*

It is extremely important that people make informed choices. Satisfaction data is one way that people can compare their choices – it is by its very nature subjective. Perception data is most useful when used with other objective data. To be meaningful any standardised form must allow for specific quotes/examples as well as a scoring system so potential service users can put the scores into context.

This must not become "spurious" choice. It will be important not to replicate the current energy market with its small number of large private sector providers dominating the market each providing a plethora of information on a range of tariffs and options which are much the same – resulting in many customers staying with their existing provider.

Ensuring all the performance data from providers is available in an accessible format to service users in one place, ensuring that it is both accurate and kept up to date and used to inform their choices would require expertise and on-going financial resources.

- *How can we ensure that people are aware of, and can exercise, their right to choice effectively in specific services, through choice champions, choice prompts, data and a possible new role for Ombudsmen?*

Those who most need public services are the most vulnerable people in our society. The provision of independent personal advice and support will be important and will be an additional cost. The White Paper does not adequately address the consequences of individuals making the wrong choice or wanting to change their mind, or of their choice not being commensurate with the needs of other service users. How far does individual choice become individual responsibility?

- *What is the appropriate role for elected and unelected office-holders in championing individuals' ability to exercise choice and ensure accountability from service providers?*

Elected members have a critical role in determining local authorities' policies and the provision of local services including choice. Elected members would need to continue to ensure that local services provide value for money and need to balance choice with costs.

The White Paper suggests that there will be zero tolerance of failure of service and minimal standards will be provided by regulators but it is not clear how this could be done on a case by case basis. Service providers are held to account through their contracts. If the contracting relationship is between an individual and a service provider the ability to intervene by elected or unelected office-holders is likely to be limited. The scrutiny function could have a role in holding providers to account but there would need to be a review of powers if it is do this for all commissioned and non-commissioned services across the public sector.

- *How can we ensure that our approach to opening public services protects and enhances accountability rather than dispersing it?*

This is one of the key dilemmas in moving increasingly towards provision of services to individuals through a range of service providers. The White Paper says that "*the relationship between the user and the provider of individual public services is at the heart of delivering truly accountable services*". However if the responsibility for the service function remains with

a local authority local people will rightly continue to hold the Council to account for that service ie the Council will be held responsible for poor performance with none of the power to make changes. In the event of provider failure the expectation will always be that the public sector will need to step in.

These "individual" services are vitally important to the wellbeing of some of the most vulnerable members of our community and cannot be left simply left to the market. It will be important to ensure that the Council or regulators can and do step in to address failure.

Neighbourhood Services

The White Paper proposes that a range of what are described as collective local services should be run at a parish, town or community council level and to roll out Neighbourhood Councils across urban areas that are "un-parished". The Council notes that the White Paper acknowledges that this a long term vision and that many areas do not yet have Neighbourhood Councils and agrees that a lot more work needs to go into thinking about these policy proposals before adopting them.

There are very real benefits in being a unitary authority; there is less confusion about who does what, residents know exactly who to hold account and there is no duplication of governance arrangements and the associated support costs. In Coventry most local services are delivered at a neighbourhood level but planned and costed at a city level. Due to the compact nature of our city changes in one neighbourhood can affect other areas of the city, for example changes to parking restrictions in one neighbourhood is likely to have an impact on adjacent neighbourhoods and possibly a wider area. This does not mean that the Council does not want to consider these proposals further but in these times of financial austerity would want to be fully assured that any benefits would outweigh the costs.

- *What is the scope for neighbourhood councils to take greater control over local services?*

Further work would need to be undertaken to understand what the benefits, if any, would be for local communities in Coventry to undertake running more services at a neighbourhood level in addition to those currently provided by local communities themselves. It is not likely that one size would fit all. The Council does not see the need for the development of a "national framework for local schemes" as this would inevitably produce a model that would not necessarily meet local need.

- *What help will neighbourhood councils need to enable them to run any services devolved to them?*

This would depend on the services that were to be devolved. Different neighbourhoods would have different levels of capacity and this would be a concern. The provision of support would be a further cost at the time that councils have reduced budgets and are making cuts elsewhere in service provision. Such additional expense is unlikely to be a local priority at this time.

- *What would make it easier to establish new neighbourhood councils in areas where local people want them?*

In areas where local people want to develop a neighbourhood council, ready access to finance, capacity building, and dedicated support and advice would be keys to assist them as would ensuring that resources were provided to the principal local authority. It would be important to ensure that there is fair access to these and that a wide range of local people can benefit from this rather than just a self-selected few,

- *Do additional checks and balances need to be created to ensure proper financial control? And how can we improve the delegation and financial framework for neighbourhood councils?*

Any body making decisions about spending public money – especially when it has been raised from local people – need to be held accountable to their local community. There would need to be robust processes in place to ensure both financial probity and that decision making is fair and fully accountable. There would be additional costs associated with this.

- *How do we ensure appropriate accountability for services run by communities to ensure that those not involved directly are not disadvantaged?*

This is of particular concern to us. Coventry City Councillors are held directly accountable for their decisions by local people through the ballot box as are parish councillors. Any decision making about local services made by a body which is not directly accountable through the ballot box needs to be fully transparent, well publicised with clarity about governance and ideally with decisions endorsed and scrutinised by directly elected representatives.

Commissioned Services

The White Paper acknowledges that local government is further ahead than many other parts of the public sector in its both its open commissioning and being innovative in the way that service area delivered. Coventry Council has a history of providing local service through a "mixed economy": meeting local needs and delivering value for money through a range of providers; and managing and developing local markets where this is necessary. The Council is already reviewing the services it provides through its "abc" programme of fundamental reviews and, through a robust methodology, considers the most effective and efficient way of providing these services.

Coventry City Council has delivered significant savings and service improvements, without necessarily going out to the market. Among recent examples is the review of street cleansing and grounds maintenance which through radical service reconfiguration, reduction in back offices and the creation of a new StreetPride Service has resulted in £500k pa savings; better deployment of resources, a more responsive service and better customer satisfaction among local residents.

The Council believes the imposition of a national commissioning policy on local government is unnecessary and could stifle innovation. Coventry's voluntary sector is currently developing a local consortium of local providers, "Here to Help". The Council is supportive of this approach and is exploring how this might impact on its own commissioning. This type of innovation would not be possible if the proposals on open commissioning in the White Paper were imposed through a national policy. The Council is also working closely with Solihull MBC and Warwickshire CC on sub-regional service provision – again local innovation which should not be stifled by the application of a national model.

- *What is the scope to extend and/or deepen the commissioning approach across public services?*

Local government is already commissioning a wide range of local services through a range of providers and has extensive experience of ensuring they provide value for money and are accountable to local people. The imposition of a national approach and more regulation is not necessary, is likely to be bureaucratic and could prevent innovation and the promotion of local solutions. A decentralised approach would give Councils the responsibility to decide what and how to commission local services.

- *What further potential is there to decentralise central government commissioning to locally elected individuals and authorities?*

The majority of public spending in a locality comes from central government. For some time local government has argued that local control over how this money is used and

commissioned would mean that services would better meet local needs and meet local priorities and could be held accountable to local people. Key areas that would benefit from this local approach include: employment and training; support to families and linking health with social care.

- *To which areas should we apply the open commissioning policy?*

These should be identified through proper review of each service area. Central Government should not restrict itself to defining a list for its own services that it sees suitable for commissioning but consider all of them – recognising that the public sector can be the most effective and efficient provider.

- *What else can government do to overcome any traditional boundaries between public service providers, which get in the way of solutions to people's needs?*

Local authorities work closely with a range of public service providers within their locality. In Coventry we are proud of our partnership working across all sectors of the city – and with them we have developed a shared vision and local priorities. The main obstacle to greater co-operation to dealing with local issues and meeting local needs is the inability for some of the public agencies to be flexible in their service provision to help with local solutions. Changing the way that such services are provided and delivered locally would make a huge difference.

- *How can we ensure that commissioners and providers are best held to account? What new skills and training will commissioners need?*

Local government is held to account by local people for its commissioning and the provision of its services – with providers being held to account through contracts and by their service users. If the commissioning process is to be increasingly focused on the delivery outcomes and payment by results rather than payment for outputs then any arrangement will need to ensure that this can be robustly managed and that service users are involved.

The White Paper proposes that elected members will have the power under the Localism Bill to do what is necessary to improve public services in their communities but despite the key policies listed it does not explain how this can be achieved with the exception of the area of health.

Both providers and commissioners will need to understand the basis on which commissioning is taking place; the expected outcomes – including how to account for wider social public benefits in the commissioning process.

Ensuring Diversity of Provision

The White Paper proposal to introduce a *"right to choice"* across individual services needs further consideration as it is not clear what this would mean in practice – many parents do not consider the example of the Education Reform Act really gives them choice. The Council is not convinced that applying Foundation Trust model to other public bodies will make them more locally accountable but does welcome the proposal to give greater autonomy for Jobcentre Plus Districts

- *How can we stimulate more openness and innovation in public services through new types of provision?*

The White Paper states that there is no favoured sector for the provision of public services but there is clearly concern from a wide range of bodies that the proposals around commissioning will benefit large rather than small organisations. For example the Department of Work and Pensions Work Programme is cited as good practice whilst in contrast the *Social Enterprise Council* has said that this is a prime example of Government commissioning which led to large private companies moving in and squeezing out smaller organisations with only a very small proportion of contracts going to social enterprises.

Such regional or national commissioning inevitably makes it more difficult to solve local problems or commission organisations close to their local communities. Councils and other local public bodies should be responsible for providing services to the public rather than central government.

- *What more could we do to support and catalyse new enterprises (e.g. mutuals) spinning out from the public sector?*

The current economic climate does not encourage innovation – uncertainty about jobs and pensions and the challenge of setting up new businesses in a time of public sector retraction need to be addressed if new enterprises are to be successful. For any new business the access to advice and support and in particular, access to funding are key to successful start-up. Like *Co-operatives UK* the Council is concerned that the implementation of the White Paper does not lead to the development of weak mutuals that are not genuinely co-operative and are set up to fail and are subsequently taken over - leading to a reduction rather than an increase in the diversity of local providers.

- *Where and how should we extend autonomous status for public sector providers?*

This should be considered through review on a service by service basis.

- *How do we ensure a true level playing field between providers in different sectors?*

Commissioning should be local and flexible. Large national or regional contracts favour large private sector providers. Commissioners should ensure that the full costs and benefits for the delivery of a service are understood and involve local providers and service users in needs assessment and co-design of services where this is appropriate. Commissioning processes should include the ability to consider wider public benefits in addition to the outcomes of the service provision.

- *How can we create new, more diverse types of provider out of public sector bodies?*

Previous attempts to diversify central government provision resulted in a range of agencies, arms length bodies and quangos. There seems to be an implicit assumption behind this question that all the current models of public sector provision are not effective and efficient and that non-state providers - are not sufficiently diverse. Form should follow function – so rather than see the creation of new models of delivery as an end in itself it is better to review the service that needs to be provided and then consider how this would be best provided.

- *How can we best enable external investors and public service providers (from all sectors) to combine their resources to improve public services?*

This is best achieved at a local level. Local needs and opportunities can be considered together in a joined up way: at neighbourhood; local authority or sub-regional level as appropriate with the freedom to innovate and provide bespoke local solutions.

- *How could we best achieve our goal for more back-office services in central government to be provided independently and flexibly?*

The White Paper cites a range of back office services that could benefit from open commissioning and these would need to be explored further. However it worth remembering that the public sector can provide such services effectively and the private sector is not uniquely placed in being able to deliver back-office efficiencies. Coventry City Council has brought its ICT service back in-house with some £5m pa savings to the public purse. The recent Parliamentary Review of Government's ICT investment has shown that this is a service area that the private sector has consistently failed to deliver on for public services and concluded that the lack of public sector professional knowledge when commissioning major ICT projects needs to be addressed.

- *How should government regularly review the barriers to entry and exit for providers?*

Consultation with a range of smaller private, voluntary and charity organisations as proposed would seem sensible.

- *How can we ensure continuity of services, in particular for the most vulnerable users?*

Ensuring continuity of service is absolutely critical. Social care is already provided through a diverse range of providers but understandably there is an expectation from service users that the public sector will be there to step in to address poor service provision or when the providers fail. The proposed "continuity regimes" appear to be a cumbersome and bureaucratic response to this issue and to assert that accountability will remain firmly with the provider does not mean that the public sector will not have to pick up the cost of failure.

Commissioning processes must include the ability to ensure that low cost provision does not result in poor services delivered by poorly paid and inadequately trained and unsupervised staff. Regulatory organisations and inspection regimes play their part in ensuring that vulnerable people are protected but these are not without cost.

Cabinet
Council

30th August 2011
13th September 2011

Name of Cabinet Member:
Cabinet Member (City Development) - Councillor Mrs Bigham

Director Approving Submission of the report:
Director of City Services & Development

Ward(s) affected:
All

Title:
Draft National Planning Policy Framework Consultation

Is this a key decision?
No

To recommend that Council submits the consultation response at **Appendix 1** to Government

Executive Summary:

1. Government is currently consulting on the draft National Planning Policy Framework (NPPF), which will replace the Planning Policy Statements and Planning Policy Guidance notes, Minerals Policy Statements and Minerals Policy Guidance, Circular 05/2005 (Planning Obligations), and various "Dear Chief Planning Officer" letters sent between 15th March 1999 and 14th January 2011 on a range of subjects. It will consolidate national planning policies into a single volume.
2. There are three major changes to planning contained within the draft. The first relates to the "presumption in favour of sustainable development", in the event that a local plan is out of date, silent, absent, or indeterminate. The implication of this in the short term at least is significant, as existing plans (in Coventry's case the 2001 Coventry Development Plan) would effectively be superseded by the Framework. There will inevitably be a period of policy vacuum between the Framework coming into force and the new Coventry Core Strategy being formally adopted. It is not, however, the case that recent Core Strategies are unaffected, as they will all be superseded by the Framework and will need to demonstrate that they comply with the Framework. It is interesting to note that the central principle of the planning system will be shifted from determining planning applications in accordance with the development plan unless material circumstances indicate otherwise

towards applying a presumption in favour of sustainable development unless the national Framework as a whole indicates the harm clearly outweighs the benefits of development.

3. A new "soundness" test is introduced, to require development plans to be "positively prepared" to accommodate all objectively assessed development needs. In the event that the evidence indicates that not all of these needs can be accommodated within the Local Authority area in which they originate, there will be a duty on neighbouring Councils to co-operate. The implication here is that, in Coventry's case, the relative shortage of developable land will lead to homes being provided beyond the Green Belt in neighbouring areas, as the harm caused by development of Green Belt could be argued to outweigh the benefits of the development itself.
4. It is proposed that offices are removed from the 'town centres first' policy. This represents a significant risk to the regeneration of the city centre, because if office jobs are no longer directed towards the city centre, the shops and other businesses that they support will follow them out of the city centre.

Recommendations:

The Cabinet is asked to recommend that Council endorses the proposed response to Government at **Appendix 1**

The Council is asked to endorse the proposed response to Government at **Appendix 1**

List of Appendices included:

Appendix 1 - Suggested response to Government consultation questions

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?

No

Will this report go to Council?

Yes -13th September, 2011

Report title: Draft National Planning Policy Framework Consultation

1. Context (or background)

- 1.1 Government is currently consulting on the draft National Planning Policy Framework (NPPF), which will replace the Planning Policy Statements and Planning Policy Guidance notes, Minerals Policy Statements and Minerals Policy Guidance, Circular 05/2005 (Planning Obligations), and various "Dear Chief Planning Officer" letters sent between 15th March 1999 and 14th January 2011 on a range of subjects. It will consolidate national planning policies into a single volume.

2. Options considered and recommended proposal

- 2.1 There are three major changes to planning contained within the draft. The first relates to the "presumption in favour of sustainable development", in the event that a local plan is out of date, silent, absent, or indeterminate. The implication of this in the short term at least is significant, as existing plans (in Coventry's case the 2001 Coventry Development Plan) would effectively be superseded by the Framework. There will inevitably be a period of policy vacuum between the Framework coming into force and the new Coventry Core Strategy being formally adopted. It is not, however, the case that recent Core Strategies are unaffected, as they will all be superseded by the Framework and will need to demonstrate that they comply with the Framework. It is interesting to note that the central principle of the planning system will be shifted from determining planning applications in accordance with the development plan unless material circumstances indicate otherwise towards applying a presumption in favour of sustainable development unless the national Framework as a whole indicates the harm clearly outweighs the benefits of development.
- 2.2 A new "soundness" test is introduced, to require development plans to be "positively prepared" to accommodate all objectively assessed development needs. In the event that the evidence indicates that not all of these needs can be accommodated within the Local Authority area in which they originate, there will be a duty on neighbouring Councils to co-operate. The implication here is that, in Coventry's case, the relative shortage of developable land will lead to homes being provided beyond the Green Belt in neighbouring areas, as the harm caused by development of Green Belt could be argued to outweigh the benefits of the development itself.
- 2.3 It is proposed that offices are removed from the 'town centres first' policy. This represents a significant risk to the regeneration of the city centre, because if office jobs are no longer directed towards the city centre, the shops and other businesses that they support will follow them out of the city centre.
- 2.4 Councils will still be required to estimate how much land will be needed to provide enough jobs, for the entire plan period, and will now be required to allocate land to meet that entire need. Councils will be prevented from protecting that allocated land from transferring to other uses, such as for housing. This is internally inconsistent, because Councils are to thoroughly assess need and allocate land for a specific purpose, but cannot make sure that the land identified and allocated for a specific purpose is actually used for that purpose.
- 2.5 It is also proposed that schools be subject to a permissive approach. As drafted the National Planning Policy Statement makes it very difficult to resist a new school in any location, unless for "planning reasons". By implication, other reasons that may be material considerations currently are not to be taken into account.

- 2.6 The transport section of the draft NPPF is clear that local standards should be set, and asks questions around what evidence Councils will need to collect, and how much it will cost. It also asks at what level/s the Council intends to set its standards, which appears at odds with using evidence to inform strategy. This is not considered to be helpful, because collecting the evidence will be resource intensive, and a larger number of locally set standards are more likely to be 'picked off' by developers than a national standard. It is assumed that the term 'local standards' refers to parking standards; however this is not made clear within the Framework. Through the response to Q7a clarification is sought on this matter.
- 2.7 It is proposed that the current minimum threshold for affordable housing to be required be removed, and that individual Councils should determine their own threshold/s taking account of overall scheme viability. It is not considered that this is helpful, as it adds a potential challenge from developers that currently does not exist, because currently guidance exists that clearly sets out minimum thresholds.
- 2.8 Neighbourhood Plans are set out in some detail in the draft Framework. There are no specific questions asked about Neighbourhood Plans by the consultation. They should be in conformity with local plans (Core Strategies), and cannot be used on their own to block development. They are required, however, to designate Local Green Space. This will be a new designation of land, that local communities identify and designate themselves, and is afforded similar protection from development as Green Belt. It is striking that the terminology used is the same as for Green Belt, but the Local Green Space does not need to fulfil any of the purposes of including land within the Green Belt (in fact land that already has Green Belt designation cannot also be Local Green Space). It is considered to be likely that urban fringe communities will seek to use Local Green Space designation to prevent development, and this has resource implications for the Council as it will have responsibility to finance an independent examination of Neighbourhood Plans, as well as a local referendum to determine whether the Neighbourhood Plan can proceed to formal adoption (at which point it legally becomes part of the development plan for the city).
- 2.9 As a late addition to the consultation process the Government have proposed that the recent draft consultation document - Planning for Traveller Sites be incorporated into the NPPF. As part of the technical response to the initial consultation the policy approach to traveller sites was largely supported, especially as it proposed greater protection for the Green Belt. The approach to traveller sites is considered to be consistent with the NPPF, and the proposals to incorporate the draft policy within it are therefore considered appropriate.
- 2.10 In general, the draft Framework is short and focussed, but it is internally inconsistent and represents a threat to the Council's jobs-led strategy, and to its focus on the city centre.

3. Results of consultation undertaken

- 3.1 This report has not been subject to external consultation, as it is concerned with responding to a Government consultation that is open to anyone to respond to.

4. Timetable for implementing this decision

- 4.1 The closing date for responses to the consultation is 17th October 2011.

5. Comments from Director of Finance and Legal Services

- 5.1 Financial implications

The financial implications of the proposal are hard to assess in advance but anything that reduces the economic viability of the city centre will have an adverse impact on the City as a whole and, in particular, reduce the City Council's income from commercial rents

5.2 Legal implications

There are no legal implications arising from this report

6. Other implications

None

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

6.1.1 The loosening of the planning requirements that will result from the National Planning Policy Framework are intended to stimulate investment in property, specifically in development of new property.

6.1.2 It is likely that the proposals will have a detrimental impact on the Council's core aims around prosperity (as the primacy of the city centre as an office based employment centre is undermined, potentially resulting in the loss of shops and services), making places and services easily accessible and encouraging a creative, active and vibrant city (as the dispersal of jobs, shops and services takes effect, so public transport and other services become less viable and are likely to rationalise), developing a more equal city with cohesive communities and neighbourhoods (as jobs become more dispersed, so access to employment is likely to rely more on access to private transport. This will have a disproportionate adverse impact on those without access to a car), and improving the environment and tackling climate change (as a more dispersed pattern of destinations relies on more car use, emissions and pollution are likely to increase).

6.2 How is risk being managed?

6.2.1 The risks associated with the proposed Framework are identified above in sections 2 and 6. They have been identified by analysing the proposals and considering the likelihood of various actors' reactions to them. It is proposed that the risks be managed by making strong representations to Government as set out at **Appendix 1**, and by continuing work on a new Core Strategy.

6.3 What is the impact on the organisation?

6.3.1 The impact on the organisation is estimated to be centred around staff time to understand and implement the new Framework. In addition, there will be resource implications due to a likely increase in appeals against refusal of planning permission.

6.4 Equalities / EIA

6.4.1 The Council has not undertaken an Equality Impact Assessment on the proposed Framework. It is the responsibility of Government and not the Council to complete this work.

6.5 Implications for (or impact on) the environment

6.5.1 The proposals concerning renewable and low carbon energy can be supported, as they are positively framed.

6.6 Implications for partner organisations?

6.6.1 The impacts on partner organisations are potentially far-reaching.

6.6.2 Neighbourhood Forums can form, and then embark upon the process of adopting Neighbourhood Plans. This is potentially resource-intensive for the Council, and also for the local communities themselves. Costs to communities are most likely to take the form of time to understand the process required, together with time and other costs (such as stationery) associated with implementing the process.

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Members: Cllr Mr George Duggins	Deputy Leader		23-08-11	

This report is published on the council's website:
www.coventry.gov.uk/councilmeetings

Appendix 1 – suggested response to consultation questions

Policy Questions

1a. "The Framework has the right approach to establishing and defining the presumption in favour of sustainable development."

DISAGREE

However, the Council is pleased with the recognition of the importance of health. It is concerned that the definition of sustainable development appears to be 'stacked' in favour of economic growth, and suggests that the first sentence of paragraph 13 be re-worded to read "The Government is committed to ensuring that the planning system does everything it can to support sustainable [economie] growth".

2a. "The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements."

DISAGREE

It is not clear from the proposed new test of soundness what happens if an LPA is unable to accommodate its objectively assessed needs, as to do so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole, but it is also not practical for neighbouring authorities to do so consistently with the presumption in favour of sustainable development.

Infrastructure requirements will, in part at least, arise from growth. Infrastructure is therefore a function of assessed need, and it is not appropriate to treat each as a standalone entity.

2c. "The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively."

DISAGREE

It is not clear where new development should be located in the event that an LPA is unable to accommodate its objectively assessed needs, as to do so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole, but it is also not practical for neighbouring authorities to do so consistently with the presumption in favour of sustainable development.

There is concern that development for which the demand is derived within a larger-than-local area could end up being 'pushed' onto the last LPA to prepare a Plan. Given the flexibilities available within the proposed duty to co-operate, there is no compulsion for LPA's to plan to meet needs in an integrated way as was the case with the Regional (Spatial) Strategies. This is notably (although not exclusively) the case with regards to housing numbers, although there is concern that as currently drafted the proposed presumption in favour of sustainable development would effectively push the balance of (wider Housing Market Area) requirements onto the last LPA to prepare a Plan. Whilst it is understood that this acts as an incentive to prepare a Plan quickly, the timings involved mean that there will inevitably be a period of planning by appeal (between the presumption in favour coming into force and the last LPA within an individual HMA

preparing a Plan). The potential costs associated with this appear to have been overlooked by the Impact Assessment.

3a. "In the policies on development management, the level of detail is appropriate."

DISAGREE

Scant information other than to give significant weight to economic development and approve sustainable development. It is not clear how much weight should therefore be given to the Local Plan.

Information on pre-app discussion and conditions / obligations is fine.

4a. "Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government."

AGREE

It is agreed that any guidance needed to support the new Framework should be light touch.

NEITHER AGREE OR DISAGREE

The Council reserves judgement concerning organisations outside Government providing this guidance, because this exposes the planning system to certain risks. These risks centre around impartiality and the central principle that planning permission should not be bought and sold (notwithstanding that CIL shares this second risk). It should be borne in mind that appearances from the lay-person's point of view are often as important as the reality from the practitioner's side, because to retain credibility the system must be seen to be fair and not open to corruption.

5a. "The 'planning for business' policies will encourage economic activity and give business the certainty and confidence to invest."

DISAGREE

The section is inconsistent, as it encourages LPA's to identify priorities for investment (paragraph 73), and then at paragraphs 74 & 75 says that land identified for economic development should not be protected as such, and suggests that changes of use away from employment generating uses should be considered favourably. The section needs to either require LPA's to identify their needs, and a portfolio of land and premises to meet those needs, or take the more laissez faire approach of paragraphs 74 and 75. As currently drafted, it is likely that the balance will be determined in an ad-hoc way by case law (at appeal) rather than by local communities taking a proactive, medium-longer term view.

The risks associated with this "planning by appeal" scenario centre around stakeholders' likely reactions to it. For example:

Developers and businesses who have consistently operated within the current framework will be exposed to twin pressures, of being exposed to a potential fall in the value of their land/premises as the supply of business land and premises is (theoretically at least) significantly widened to the point whereby there is a danger of over-allocation, and of

being undercut by rivals who have lower overheads (notably in the cost of their premises). The businesses who operate within the existing framework are therefore punished for doing so, and can be expected to relocate if in their judgement the cost benefits of a move outweigh the locational benefits they currently enjoy (and can expect to diminish as the distribution of businesses widens over time).

A significant number of Local Planning Authorities can be expected to take a risk-averse stance. This is because it is more politically palatable to allocate land, but in particular Greenfield and Green Belt land, for employment generating uses than for new homes. Councils can be expected, when analysing the dichotomy identified above between allocating land for specific purposes but being prevented from protecting it from development for other uses, to not want large scale housing development on Greenfield / Green Belt land, and so under-allocate land for employment-generating uses to mitigate against that risk.

5c. What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

This is data that needs to be collected by Government. If more local indicators are to be used, there are risks around the consistency of data collection.

6a. "The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres."

STRONGLY DISAGREE

The omission of offices from the 'town centre first' policy approach will undermine centres viability, because the shops rely on a critical mass of people with money to spend, and by taking jobs out of centres there is a risk that retail spending will follow. A more dispersed pattern of jobs will therefore inevitably result in a more dispersed pattern of shops and other services, potentially leaving existing centres derelict and dangerous places. This is inconsistent with transport policy that seeks to reduce the need to travel, encourage linked trips, and focus developments in accessible locations.

7a. "The policy on planning for transport takes the right approach."

AGREE

Local Transport Plans and the way in which economic policies relate to the location of offices need to be compatible, to enable linked trips and reduced travel distances between jobs and homes. This relates to the previous comments in respect of the proposed removal of offices from the centres policy. Paragraph 89, third bullet point, needs to explicitly require that new development is linked to existing developments. Amend to read "Create safe and secure layouts **within and to new development** which minimise conflicts between traffic and cyclists or pedestrians".

Paragraphs 83, 86 & 88 need to refer to "sustainable **and healthy** modes of transport".

Paragraph 92, include healthcare in list of key facilities.

Paragraph 93, it is assumed that "local standards" referred to are parking standards? We would request confirmation that this is the case

Paragraph 145 would be helpful if copied into the transport section, as a lever to achieve strategic Park & Ride at the urban fringe in what are often necessarily Green Belt sites.

8a. "Policy on communications infrastructure is adequate to allow effective communications development and technological advances."

AGREE

The policy approach does not appear to have changed.

9a. "The policies on minerals planning adopt the right approach."

DISAGREE

Paragraph 106 is considered to be inconsistent, as there should be a presumption against development unless it provides national, local or community benefits which clearly outweigh the likely impacts to justify the grant of planning permission. Given that a positive contribution towards the national balance of payments features strongly throughout the draft Framework as the key driver of the planning system, it is likely that proposals will be refused for local reasons and allowed at appeal for national reasons. A better approach would be to indicate a presumption in favour of coal extraction.

10a. "The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand."

DISAGREE

The section, as currently drafted, is inconsistent.

Paragraph 109 requires a 6 year supply of housing sites (5 years plus 20%), but then refers to years 6-10 and 11-15. This risks sites being double counted (in both the 6 years supply and the following five year chunk) and total confusion at appeal. It is not clear whether this 20% refers to numbers of homes or land area.

Paragraph 109 is not clear whether a housing implementation strategy will be a formal planning document, or part of the Local Authority's Housing Strategy (this point is the same for "housing strategy"). If the implementation strategy only covers "market housing", in the 5 year (plus 20%) land supply, could developers potentially challenge social housing obligations on those sites?

It is considered that paragraph 109 needs to be amended to allow for the supply of land for housing in order to cover all housing requirements and for the housing implementation strategy to be more closely defined.

11a. "The policy on planning for schools takes the right approach."

DISAGREE

The approach appears to seek to impose any school in any area, and risks provocation on the part of schools promoters. Paragraph 127 needs to acknowledge that there are recognised planning issues associated with faith schools that need to be considered when determining planning applications.

12a. "The policy on planning and design is appropriate and useful."

DISAGREE

The section is inconsistent, for instance paragraphs 118 and 121. Given the degree of subjectivity in architectural tastes, there are many schemes that may be considered to be poor architecture by some but acceptable by others. Ultimately this will come down to whether or not a refusal can be substantiated and defended at appeal.

It is not clear from paragraph 116 whether the planning system is going to have more control over the internal layout and size of buildings – it is considered that this is the only way to ensure that a building is fit for purpose and adaptable.

Paragraph 117 is not referring to design codes, which go into more detail than the general requirements that can be expected to be set out in a site development brief. A design code sets out architectural styles, features and materials that a developer would be expected to adhere to.

It is not clear whether paragraph 120 is referring to some form of design review panel. If so, who would sit on it? Such a panel may comment on a scheme with little understanding of the site, context of the proposal, or the complex issues and economic factors that influence schemes' design. While an outside view can be helpful it may also be counterproductive and to the detriment of the timely progress of a proposal through the planning process.

It is agreed that we should have community involvement, as the Council already does, but this needs to be actively managed to ensure timely progress of schemes through the planning process.

13a. "The policy on planning and the Green Belt gives a strong clear message on Green Belt protection."

AGREE

The policy relating to Green Belts does not appear to fundamentally change.

However, paragraph 146 is inconsistent, as it says that some renewable energy projects are inappropriate development in the Green Belt but circumstances to justify inappropriate development in the Green Belt include production of energy from renewable sources.

14a. "The policy relating to climate change takes the right approach."

AGREE

Taken in isolation, broadly-speaking it does take a reasonable approach, but the concerning thing is that in the real world other facets of so-called 'sustainable development' will take priority over considerations relating to climate change (with the emphasis very much on development), with the result that in practice climate change is not given the weight it deserves in formulating policies and determining planning applications. Paragraph 148 first sentence insert "**temperature change**" after "taking full account of"

Paragraph 148 point to read "minimise vulnerability and provide resilience to impacts arising from climate change **by improving housing stock to take account of heatwaves and extreme cold weather events**"

The reference to 'the transition to a low carbon economy' in para 148 is too narrow in focus – it's about more than this. The transition needs to be a broader one, ie to low carbon living generally.

Para 148, amend 'the appropriate location and layout of new development' to 'appropriate location, layout and design of new development' (i.e. the statement needs to take into account the fact that reducing greenhouse gas emissions is about more than just location and layout).

Para 150, need to define 'nationally described standards', not least because not all standards currently used have the same status (for instance the Code for Sustainable Homes has a different status to BREEAM), and planning authorities need to understand if both are considered to be 'nationally described'.

14c. "The policy on renewable energy will support the delivery of renewable and low carbon energy."

AGREE

14e. "The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities."

DISAGREE

The requirement for commercial scale projects located outside opportunity areas to meet the criteria used in identifying opportunity areas, whilst will be relevant in some cases, will not always be so and could have the impact of stifling innovation. There should therefore be some flexibility about whether the criteria is used, on a case-by-case basis.

14g. "The policy on flooding and coastal change provides the right level of protection."

AGREE

15a. "Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment."

AGREE

16a. "This policy provides the right level of protection for heritage assets."

AGREE

17a. Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

No

17b. Do you wish to answer detailed questions on the impact assessment? There are about 32 of them.

Yes

Impact assessment questions

QA1: We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.

QA2: Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework?

Not known at this time.

QA3: Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?

No. "Overheads" (that incidentally are not defined or set out) should not be counted as a part of wage rates. There are costs associated with recruitment from an employer's point of view, but to include such costs (and pensions contributions) within "wage rates" is misleading. If "wage rates" are to be assumed, they should consist of the basic salary only.

QA4: Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?

No.

QA5: What behavioural impact do you expect on the number of applications and appeals?

An increase in the number of appeals can be expected, as planning authorities implement the new approach. The problem of the policy vacuum between the date the NPPF comes into force, and the date a Local Plan is adopted, is likely to result in Local Planning Authorities taking a risk-averse position, refusing more planning applications.

Developers and businesses who have consistently operated within the current framework will be exposed to twin pressures, of being exposed to a potential fall in the value of their land/premises as the supply of business land and premises is (theoretically at least) significantly widened to the point whereby there is a danger of over-allocation, and of being undercut by rivals who have lower overheads (notably in the cost of their premises). The businesses who operate within the existing framework are therefore punished for doing so, and can be expected to relocate if in their judgement the cost

benefits of a move outweigh the locational benefits they currently enjoy (and can expect to diminish as the distribution of businesses widens over time).

A significant number of Local Planning Authorities can be expected to take a risk-averse stance. This is because it is more politically palatable to allocate land, but in particular Greenfield and Green Belt land, for employment generating uses than for new homes. Councils can be expected, when analysing the dichotomy between allocating land for specific purposes but being prevented from protecting for development for those specific purposes, to not want large scale housing development on Greenfield / Green Belt land, and so under-allocate land for employment-generating uses to mitigate against that risk.

It follows that there will be a shortage of readily-available employment land, as well as a shortage of housing land, and under those circumstances upward pressure on price can be expected to a greater or lesser degree. Other than in 'prime' locations, this is unlikely to provide certainty or confidence to invest for businesses (other than housebuilding businesses)

QA6: What do you think the impact will be on the above costs to applicants?

Costs to applicants will rise, at least until case law has established the details of the new policy approach, as the refusal rate and therefore the number of appeals increases.

QA7: Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?

The proposal to consolidate national policy, in principle, is welcomed. The introduction of new principles, such as additional soundness test, presumption in favour of (sustainable) development introduces risks that are clearly identified elsewhere in the Council's response. Similarly, the omission of existing principles potentially has far-reaching risks both for how people live and work, but also how capital behaves – this is especially the case with the removal of offices from the sequential approach.

QB1.1: What impact do you think the presumption will have on:

(i) the number of planning applications?

It may result in a short term flurry of applications as developers test different interpretations of the presumption, both of individual LPA's and PINS. As case law establishes 'correct' interpretation, the number of applications can be expected to reduce.

(ii) the approval rate?

It will reduce in the short-medium term

(iii) the speed of decision-making?

The average total time from validation of applications to a final decision can be expected to reduce as the refusal rate increases and the number of appeals sees a corresponding increase.

QB1.2: What impact, if any, do you think the presumption will have on:

(i) the overall costs of plan production incurred by local planning authorities?

Not known at this time

(ii) engagement by business?

Not known at this time

(iii) the number and type of neighbourhood plans produced?

It can be expected to bring about a substantial number of neighbourhood plans produced, as those neighbourhoods who may seek to use them to block development will quickly realise that they are needed before land can be designated as Local Green Space, and effectively be afforded quasi-Green Belt status.

QB1.3: What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?

The presumption in favour of (sustainable) development will skew the balance between economic, environmental and social outcomes in favour of economic growth. In some cases, this will inevitably be to the detriment of social and/or environmental outcomes, and this will result in costs to be met by society as a whole. It effectively privatises the benefits of development, and socialises the costs.

QB1.4: What impact, if any, do you think the presumption will have on the number of planning appeals?

The presumption will result in a short-medium term flurry of appeals, as the case law is established and LPA's seek to prevent development of Green Belt and other Greenfield land, and to protect their urban regeneration strategies by directing investment towards centres.

QB2.1: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

No.

QB2.2: Is 10 years the right time horizon for assessing impacts? Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

Not known at this time.

QB2.3: How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

It is difficult to estimate the costs of developing a suitable evidence base to support local standards. It can be expected to be a complicated process:

- Defining and measuring the accessibility of the entire city.
- Measuring local car ownership will require 'local' to be defined, and then rolled out across the entire city.
- Collating and mapping the data collected across the entire city.
- Taking account of all of the available data and identifying areas under parking pressure, and conversely areas not under pressure.
- Repeating the exercise for retail, offices, factories, leisure, storage & distribution, services and community facilities such as doctors, libraries, pubs etc.

QB2.4: As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of this policy change?

Not known that this time. The City Council has not prepared its evidence base to inform local parking standards.

QB2.5: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

Not known at this time

QB3.1: What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

The Council remains committed to protect Green Belt and other Greenfield land from housing development, so the removal of the brownfield target will have no impact.

QB3.2: Will the requirement to identify 20 per cent additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

It is no different to now, as the current monitoring year needs to be added to the housing trajectory in an Annual Monitoring Report. The way it is presented however, is a recipe for confusion as developers seek to show that LPA's have double counted some or all of the 6 year supply (that is their first 5 year supply plus 20%), and the second 5 year supply.

QB3.3: Will you change your local affordable housing threshold in the light of the changes proposed? How?

It is too early to determine, evidence will need to be collected and analysed to ascertain whether a lower threshold would have a detrimental impact on the viability of development (the draft Framework is clear that if so, we cannot lower the threshold), how many additional homes we could expect to be provided, and at what cost.

QB3.4: Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

N/A

QB3.5: How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

Not known at this time, although experience suggests it is likely to be in the region of £25,000-£50,000.

QB3.6: How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

Not known at this time.

QB3.7: Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

No. The costs of establishing case law concerning replacement of buildings other than dwellings in the Green Belt with dwellings are not considered.

QB4.1: What are the resource implications of the new approach to green infrastructure?

It is anticipated that there will be considerable costs associated with the establishment of case law as the new approach is tested.

QB4.2: What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

It will be used to block development at the urban fringe, by those who have previously sought to use Village Greens to block development. The designation would effectively treat land in the same way as if it were designated Green Belt, but without the need for the land to perform any of the purposes of Green Belt. The result will be that development leapfrogs the Green Belt, with longer commuting distances, higher carbon emissions, and associated social impacts from hard working families spending ever-increasing amounts of time commuting to and from work.

QB4.3: Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

Not known at this time.

QB4.4: How will your approach to decentralised energy change as a result of this policy change?

Not known at this time.

QB4.5: Will your approach to renewable energy change as a result of this policy?

Not known at this time.

QB4.6: Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?

Not known at this time.

Traveller Sites Policy Question - Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

The Council are of the view that the Draft Planning Policy for Traveller Sites is largely consistent with the NPPF. Although we do not consider this to be a best practice approach to the formulation of national policy, we do agree that within the context of what

the NPPF is aiming to achieve it would be appropriate to incorporate the policy on traveller sites within the NPPF.