

**Time and Date**

2.00 pm on Tuesday, 28th November, 2017

Place

Committee Room 3 - Council House

Public business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 5 - 10)
 - (a) To agree the minutes from the meeting of Cabinet on 31st October 2017
 - (b) Matters arising
4. **Exclusion of Press And Public**

To consider whether to exclude the press and public for the item(s) of private business for the reasons shown in the report.
5. **2017/18 Second Quarter Financial Monitoring Report (to September 2017)**
(Pages 11 - 30)

Report of the Deputy Chief Executive (Place)
6. **Medium Term Financial Strategy 2018-21** (Pages 31 - 44)

Report of the Deputy Chief Executive (Place)
7. **Pre-Budget Report 2018/19** (Pages 45 - 60)

Report of the Deputy Chief Executive (Place)
8. **Adoption of the Coventry Local Plan and City Centre Area Action Plan**
(Pages 61 - 196)

Report of the Deputy Chief Executive (Place)
9. **MiFriendly Cities - Successful Award of Funds under EU Urban Innovative Actions Fund** (Pages 197 - 214)

Report of the Deputy Chief Executive (People)

10. **Coventry Station Masterplan Procurement Strategy Update** (Pages 215 - 224)
Report of the Deputy Chief Executive (Place)
11. **Indoor Pitch Facility at The Alan Higgs Centre** (Pages 225 - 236)
Report of the Deputy Chief Executive (Place)
12. **Preventative Support - Adult Services** (Pages 237 - 256)
Report of the Deputy Chief Executive (People)
13. **Heritage Framework Agreement** (Pages 257 - 280)
Report of the Deputy Chief Executive (Place)
14. **Coventry's Bid for UK City of Culture 2021 - Council Commitments**
(Pages 281 - 292)
Report of the Deputy Chief Executive (Place)
15. **City Centre South - Early Acquisition of Long Leasehold Property Interests** (Pages 293 - 304)
Report of the Deputy Chief Executive (Place)
16. **National Battery Manufacturing Development Facility - Faraday Challenge** (Pages 305 - 312)
Report of the Deputy Chief Executive (Place)
17. **Outstanding Issues** (Pages 313 - 316)
Report of the Deputy Chief Executive (Place)
18. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Private business

19. **Preventative Support - Adult Services** (Pages 317 - 340)
Report of the Deputy Chief Executive (People)
(Listing Officer: M McGinty, Tel: 024 7683 1514)
20. **Heritage Framework Agreement** (Pages 341 - 364)
Report of the Deputy Chief Executive (Place)
(Listing Officer: J Grant, tel: 024 7683 3674)

21. **Coventry's Bid for City of Culture 2021 - Council Commitments** (Pages 365 - 378)
Report of the Deputy Chief Executive (Place)
(Listing Officer: D Nuttall, tel: 024 7683 2362)
22. **City Centre South - Early Acquisition of Long Leasehold Property Interests** (Pages 379 - 390)
Report of the Deputy Chief Executive (Place)
(Listing Officer: D Cockroft, tel: 024 7683 3964)
23. **National Battery Manufacturing Development Facility - Faraday Challenge** (Pages 391 - 400)
Report of the Deputy Chief Executive (Place)
(Listing Officer: A Williams, tel 024 7683 3731)
24. **Any other items of private business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Martin Yardley, Deputy Chief Executive (Place), Council House Coventry

Monday, 20 November 2017

Note: The person to contact about the agenda and documents for this meeting is Lara Knight / Michelle Salmon, Governance Services, Tel: 024 7683 3237 / 3065, Email: lara.knight@coventry.gov.uk / michelle.salmon@coventry.gov.uk

Membership:

Cabinet Members:- Councillors F Abbott, L Bigham, P Akhtar (Deputy Cabinet Member), R Ali (Deputy Cabinet Member), F Abbott, K Caan, G Duggins (Chair), J Innes, A Khan (Deputy Chair), R Lakha (Deputy Cabinet Member), K Maton, J Mutton, J O'Boyle, E Ruane, C Thomas (Deputy Cabinet Member), D Welsh (Deputy Cabinet Member) and B Kaur (Deputy Cabinet Member)

Non-voting Deputy Cabinet Members:- Councillors P Akhtar, R Ali, B Kaur, R Lakha, C Thomas, and D Welsh

By invitation:- Non-voting Opposition representatives:- Councillors A Andrews and G Ridley

Please note: a hearing loop is available in the committee rooms

If you require a British Sign Language interpreter for this meeting
OR if you would like this information in another format or
language please contact us.

**Lara Knight / Michelle Salmon, Governance Services,
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Coventry City Council

Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 31 October 2017

Present:

Members:

Councillor G Duggins (Chair)
Councillor A Khan (Deputy Chair)
Councillor F Abbott
Councillor L Bigham
Councillor K Caan
Councillor K Maton
Councillor J Mutton
Councillor J O'Boyle
Councillor E Ruane

Deputy Cabinet Members:

Councillor R Ali
Councillor B Kaur
Councillor R Lakha
Councillor C Thomas

Non-Voting Opposition Members:

Councillor A Andrews
Councillor G Ridley

Other Members:

Councillor N Akhtar
Councillor R Brown
Councillor J Clifford
Councillor M Mutton
Councillor J McNicholas
Councillor S Walsh

Employees (by Directorate):

Chief Executive's

M Reeves (Chief Executive), N Hart

People

G Quinton (Deputy Chief Executive (People)), J Gregg,
G Kell, P Smith

Place

M Yardley (Deputy Chief Executive (Place)), B Hastie,
J Newman, M Salmon

Apologies:

Councillor J Innes
Councillor P Akhtar
Councillor D Welsh

Public Business

65. Declarations of Interest

There were no disclosable pecuniary interests made.

66. **Minutes**

The minutes of the meetings held on 4th and 10th October 2017 were agreed and signed as a true record. There were no matters arising.

67. **Creation of a Regional Adoption Agency**

The Cabinet considered a report of the Deputy Chief Executive (People) that sought agreement for the City Council to become part of a Regional Adoption Agency through a shared service arrangement with Solihull Metropolitan Council, Warwickshire County Council and Worcestershire County Council. The new Regional Adoption Agency to be known as Adoption Central England (ACE).

ACE would deliver the adoption agency functions of the four local authorities including the assessment, training and approval of adopters, the identification of prospective adopters for children who were in need of a new adoptive family and adoption support to adoptive families and some Special Guardianship support services.

Warwickshire County Council would become the host authority to facilitate the operational delivery of the shared service, however governance arrangements would ensure that all four authorities retained strategic responsibility for performance delivery and outcomes.

The matter had also been discussed at the Education and Childrens Services Scrutiny Board (2) at their meeting on 31st October 2017 (their minute 22/17 referred) and the outcome of their consideration, which recommended that Cabinet accept the approach to a regional adoption agency, was set out in a Briefing Note appended to the report.

RESOLVED that the Cabinet:

- 1) **Agrees the recommendation from the Education and Childrens Services Scrutiny Board (2), that the approach to a regional adoption agency be accepted.**
- 2) **Notes the outcomes of the engagement and consultation and the resulting equality impact assessment.**
- 3) **Delegates authority to the Deputy Chief Executive (Place) (Legal Services) to finalise, and approve the Partnership and Hosting Agreement.**
- 4) **Subject to recommendation 2 above, delegates authority to the Director of Children's Services to sign on behalf of the City Council a partnership arrangement alongside Solihull Metropolitan Council, Warwickshire County Council and Worcestershire County Council for ACE to undertake the delivery of the City Council's adoption service.**

- 5) **Subject to recommendation 2 above, delegates authority to the Director of Children's Services to sign on behalf of the City Council a partnership arrangement alongside Solihull Metropolitan Council, Warwickshire County Council and Worcestershire County Council for ACE to undertake the delivery of some of the City Council's Special Guardianship services.**
- 6) **Approves Warwickshire County Council becoming the host authority to facilitate the operational delivery of the adoption service and some Special Guardianship support services on behalf of Coventry City Council.**
- 7) **Agrees the provisional financial proposals as outlined in the financial considerations section of the report below (paragraph 1.12 refers) to fund ACE (as agreed by the ACE Executive Board); and to delegate authority to the Section 151 Officer in consultation with the Director of Children's Services to agree the final value of the total cash limit.**
- 8) **Delegates authority to Deputy Chief Executive (People) (Human Resources) to progress staffing secondments to Warwickshire County Council as the host authority and to review the status of those agreements within the first twelve months.**

68. **Youth Justice Plan**

The Cabinet considered a report of the Deputy Chief Executive (People) that would also be considered at the meeting of the Council on 5th December 2017, which provided notification that The Coventry Youth Offending Service (CYOS) Youth Justice Plan 2017-2018, a copy of which was attached as an appendix to the report, had been agreed and signed off by its Statutory Partners, and sought Council endorsement of the Plan.

Youth Offending Teams were established under the Crime and Disorder Act 1998 (CDA). The functions assigned to the YOS included the duty upon the Local Authority under the Children Act 1989 to take all reasonable steps to encourage children not to commit offences. The Act imposed a duty on each Local Authority acting in co-operation with its Statutory Partners (Police, Health and Probation), to ensure that all youth justice services were available in their area to such an extent as it appropriate for the area.

The key tasks of the service were:

- Assessing and delivering interventions to the out-of-court-disposal cohort
- Management and delivery of community sentences
- Management and delivery of secure estate sentences and resettlement
- Servicing the Youth Court and Crown Courts (in terms of provision of a court team, bail & health assessments, provision of pre-sentence reports and stand down reports)
- Victim services
- Parenting services and management of Parenting Orders

The CDA legislation also imposed a duty to complete and submit a Youth Justice Plan each year. The Plan provided an overview of CYOS achievements against key indicators, plans and targets, and identified the key strategic actions for the next 12 months.

Statutory Partners (Police Health, Probation, and Local Authority, represented by the Director of Children Services) agreed and signed off the Plan at CYOS Statutory Board meeting on 31st July 2017.

RESOLVED that the Cabinet recommends that the Council endorses the Youth Justice Plan 2017-2018.

69. **Governance of the West Midlands Fire Service**

The Cabinet considered a report of the Chief Executive that would also be considered by the Council at its meeting on 5th December 2017, which consulted constituent authorities on the now prepared Governance review and scheme for the proposed governance model of the West Midlands Fire Service (under the Mayoral West Midlands Combined Authority) prior to going out for formal public consultation.

The Governance Review, detailed in Appendix A to the report, provided a review of existing governance arrangements and functions, this included the proposed new model under the Mayoral combined authority.

The Scheme, set out in Appendix B to the report, detailed the roles, accountabilities, and powers required by each individual /body in the proposed governance model.

Following constituent authority consultation on the Governance Review and Scheme, the Scheme must enter a formal public consultation in adherence to Section 112 of the Local Democracy, Economic Development and Construction Act 2009.

The Government would use these documents and the results of the consultation to approve the model and create an order to amend existing legislation, in order to confer the necessary powers on the Mayoral West Midland Combined Authority to carry out the functions currently exercised by the West Midlands Fire and Rescue Authority.

The timetable for the proposals, set out in a table in the report, indicated that the WMFRA functions would finally transfer to the WMCA in November/ December 2018. Work was currently underway to implement a Reformed Fire Authority as an interim measure until WMFRA functions were transferred to and assumed by the Mayoral Combined Authority.

RESOLVED that the Cabinet:

- 1) Agrees that proposed arrangements for West Midlands Fire Service should include the West Midland Combined Authority Fire Service budget being ring fenced for Fire Service functions.**

- 2) Approves the prepared governance review and scheme.
- 3) Agrees to move forward to public consultation for the scheme and proposed governance model.
- 4) Delegates authority as required to the Chief Executive to make minor amendments to the Governance review and Scheme on completion of the Local Authority approval process and prior to public consultation.
- 5) Recommends that the Council approves recommendations 1, 2 and 3 above at its Council meeting on 5th December 2017.
- 6) Supports/leads on the public consultation in the City of Coventry region on behalf of the West Midlands Combined Authority.
- 7) Notes the timeline of governance route to Mayoral West Midlands Combined Authority.

70. **Outstanding Issues**

The Cabinet considered a report of the Deputy Chief Executive (Place) that contained a list of outstanding issue items that would be submitted to future meetings of the Cabinet and summarised the current position in respect of each item.

RESOLVED that the Cabinet approves the dates for future consideration of matters relating to the outstanding issue items listed in the report.

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

There were no other items of public business.

(Meeting closed at 2.30 pm)

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Public report Cabinet Report

Cabinet
Audit and Procurement Committee

28th November 2017
18th December 2017

Name of Cabinet Member:

Cabinet Member for Strategic Finance & Resources – Councillor J Mutton

Director approving submission of the report:

Deputy Chief Executive Place

Ward(s) affected:

City Wide

Title:

2017/18 Second Quarter Financial Monitoring Report (to September 2017)

Is this a key decision?

No

Executive summary:

The purpose of this report is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and of the Council's treasury management activity as at the end of September 2017.

The headline revenue forecast for 2017/18 is an overspend of £3.1m. This has improved since the Quarter 1 position when it stood at £4.6m whilst at the same point in 2016/17 there was a projected overspend of £7.1m. Notwithstanding the relative improvement since Quarter 1 and the equivalent position last year, the reasons for the overspend represent some concerning trends for the Council. At a time of continued tightening of local authority resources the current position still represents one that demands a strong focus on addressing the underlying issues.

This position continues to reflect areas for which overspends have been reported previously but it also incorporates the emergence of new budgetary issues. The main areas of financial pressures result from a shortfall in delivering savings targets set in previous budgets in some areas and some local externally driven demand pressures, in particular, in relation to looked after children and an increase in homelessness. Where relevant, these pressures have been incorporated within the 2018/19 Pre-Budget Report (Cabinet 28th November 2017) although the expectation is that some of these pressures may increase substantially in 2018/19 compared with the current year.

The Council's Capital spending is projected to be £119.9m for the year, a net decrease of £9.1m on the position reported at Quarter 1.

Recommendations:

Cabinet is recommended to:

1. Note the forecast revenue overspend at Quarter 2.
2. Approve the revised capital estimated outturn position for the year of £119.8m incorporating: £1m net increase in spending relating to approved/technical changes (Appendix 2) and £9.1m of expenditure rescheduled into 2018/19 (Appendix 4).

Audit and Procurement Committee is recommended to:

1. Consider whether there are any comments they wish to be passed to Cabinet

List of Appendices included:

Appendix 1	Revenue Position: Detailed Directorate breakdown of forecast outturn position
Appendix 2	Capital Programme: Analysis of Budget/Technical Changes
Appendix 3	Capital Programme: Estimated Outturn 2017/18
Appendix 4	Capital Programme: Analysis of Rescheduling
Appendix 5	Prudential Indicators

Background Papers

None

Other useful documents:

None

Has it or will it be considered by scrutiny?

No

Has it, or will it be considered by any other council committee, advisory panel or other body?

Audit and Procurement Committee, 18th December 2017

Will this report go to Council?

No

Report Title:

2017/18 Second Quarter Financial Monitoring Report (to September 2017)

1. Context (or Background)

1.1 Cabinet approved the City Council's revenue budget of £232.5m on the 21st February 2017 and a Directorate Capital Programme of £123.2m. This is the second quarterly monitoring report for 2017/18 to the end of September 2017. The purpose is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and to report on the Council's treasury management activity.

1.2 The current 2017/18 revenue forecast is an overspend of £3.1m, a decrease of £1.5m on the Quarter 1 position of £4.6m. The reported forecast at the same point in 2016/17 was an overspend of £7.1m. Capital spend is projected to be £119.9m, a decrease of £9.1m on the Quarter 1 position.

2. Options considered and recommended proposal

2.1 **Revenue Forecast** - The forecast revenue overspend £3.1m is analysed by service area below.

Table 1 - Forecast Variations

Service Area	Revised Net Budget £m	Forecast Spend £m	Forecast Variation £m
People Directorate			
Public Health	0.5	0.1	(0.4)
Directorate Management	1.5	1.5	0.0
Education & Inclusion	12.4	12.5	0.1
Children & Young People	71.6	76.6	5.0
Adult Social Care	81.9	81.6	(0.3)
Customer Services & Transformation	2.8	4.6	1.8
Total People Directorate	170.7	176.9	6.2
Place Directorate			
Directorate Management	4.0	4.0	0.0
City Centre & Major Projects	7.2	7.3	0.1
Transportation & Highways	3.9	4.1	0.2
Streetscene and Regulatory	27.1	27.7	0.6
Project Management & Property	(7.5)	(7.9)	(0.4)
Finance & Corporate Services	6.9	8.0	1.1
Total Place Directorate	41.6	43.2	1.6
Contingency & Central Budgets	20.2	15.5	(4.7)
Total Spend	232.5	235.6	3.1

2.2 Individual Directorate Comments for Revenue Forecasts

A summary of the forecast year-end variances is provided below. Further details are shown in Appendix 1.

People

The People Directorate continues to face significant financial challenges, and a large underspend on centralised salaries (£3.9m) masks a significant overspend across other areas (£10.1m).

The net position of a £6.2m overspend includes undelivered savings targets of £2.6m. This is largely as a result of delays in delivery within Children's Services and Customer Services & Transformation. Both divisions have plans against the targets however they will not be delivered within the required timescales.

The remainder of the problem is a result of budgetary control pressure, including a significant increase in the Looked After Children (LAC) population (average LAC numbers in 2016/17 were 587, whereas the discrete numbers at the end of September are in excess of 650) as well as continued pressures in supported accommodation provision for care leavers.

Children's Leadership Team are reviewing all children and young people in placements (both LAC and Supported) to identify how costs can be reduced within the financial year and as a result have managed to reduce numbers in residential provision. Further work is in train to interrogate the LAC trends, plans and budget forecast for a more detailed consideration to include the Deputy Chief Executive (People) and Director of Finance and Corporate Services.

Place

The largest pressure within the Place Directorate's overall forecast deficit of £1.6m, relates to the unfunded cost of housing families in temporary accommodation, which due to the significant increase in homelessness, is causing a £1.5m overspend in 2017/18. Other significant pressures exist in the refuse service relating to the roll out of the redesigned service and also the need to maintain collections over the Christmas period.

A number of vacancies across the whole directorate are also being temporarily covered by agency staff as a result of reviews being carried out or difficulties in recruitment. In most cases the external cost is offset by underspends on salary budgets.

There are some other income pressures being experienced in relation to the Parks service, Corporate catering, Monitoring & Response Service and Parking enforcement, all of which are actively being managed by service managers with the view to resolving in the medium term.

Contingency & Central

The variance on Corporate budgets has improved by £2.1m since Quarter 1. This reflects a revised estimate of expected grant income relating to Business Rates reliefs and an updated improved position relating to the impact of the Council's participation in the West Midlands Business Rates Pilot which have a combined impact of £1.3m. The remaining movement is on inflation contingencies which in total are expected to underspend by £2.5m, with further underspends in the Asset Management Revenue Account and the Apprenticeship Levy.

2.4 Capital Programme

Table 2 below updates the budget to take account of a £1.0m increase in the programme, and a reduction of £9.1m for expenditure which is now planned to be carried forward into future years. This gives a revised projected level of expenditure for 2017/18 of £119.9m. Appendix 3 provides an analysis by directorate of the movement since quarter 1.

The resources available listed below show how the Capital Programme will be funded in 2017/18. It shows 54% of the capital programme is funded by external grant. Overall the capital programme and associated resourcing reflects a forecast balanced position in 2017/18.

Table 2 – Movement in the Capital Budget

CAPITAL BUDGET 2017-18 MOVEMENT	£m
Estimated Outturn Quarter One	128.0
Approved / Technical Changes (see Appendix 2)	1.0
"Net" Rescheduling into future years (see Appendix 4)	(9.1)
Revised Estimated Outturn 2017-18	119.9

RESOURCES AVAILABLE:	£m
Prudential Borrowing (Specific & Gap Funding)	51.6
Grants and Contributions	64.3
Capital Receipts	0.5
Revenue Contributions	3.0
Leasing	0.5
Total Resources Available	119.9

On the 10th October 2017, the Council approved a report to acquire a further financial interest in Coombe Abbey Park Ltd. Upon completion the transaction will be incorporated into the Council's Capital Programme and reflected in subsequent monitoring reports.

Final decisions on the funding of the programme will be made at year-end, based on the final level of spend and the level of resources available. These decisions will pay due regard to the need to earmark resources to fund future spending commitments. In recent years the Council has delayed prudential borrowing as a means of funding capital spend but it is important to be aware that significant amounts of borrowing have been approved to fund the 2017/18 and future programmes and this will come on-stream over the next few years. The revenue funding costs of this have been built into the Council's forward financial plans.

2.5 Treasury Management Activity in 2017/18

Interest Rates

The economic outlook for the UK remains uncertain with Brexit negotiations ongoing, however the most recent inflation data indicates that CPI inflation is currently at 3.0%. The Bank of England Committee who set the official interest indicated at the last meeting that an increase in interest rates was likely to be appropriate to return inflation to a lower level

and a subsequent meeting of the Committee has approved an interest rate increase to 0.5% applicable from November.

Long Term (Capital) Borrowing

The net long term borrowing requirement for the 2017/18 capital programme is £43.8m, taking into account borrowing set out in Section 2.4 above (total £51.6m), less amounts to be set aside to repay debt, including non PFI related Minimum Revenue Provision (£7.8). No long term borrowing has been undertaken for several years, in part due to the level of investment balances available to the authority. Any future need to borrow will be kept under review in the light of a number of factors, including the anticipated level of capital spend, interest rate forecasts and the level of investment balances.

During 2017/18 interest rates for local authority borrowing from the Public Works Loans Board (PWLB) have varied within the following ranges:

PWLB Loan Duration (maturity loan)	Minimum 2017/18 to P6	Maximum 2017/18 to P6	As at the End of P6
5 year	1.34%	1.82%	1.79%
50 year	2.45%	2.79%	2.75%

The PWLB now allows qualifying authorities, including the City Council, to borrow at 0.2% below the standard rates set out above. This “certainty rate” initiative provides a small reduction in the cost of future borrowing. In addition the Council has previously received approval to take advantage of a “project rate” as part of the Coventry and Warwickshire Local Enterprise Partnership (LEP), enabling it to access PWLB borrowing up to the end of 2017/18, at 0.4% below the standard rate for £31m of borrowing required for delivery of the Friargate Project. Given current interest rates and the level of investment balances held by the Council, it is likely that the Council will not use the “project rate” facility.

Regular monitoring continues to ensure identification of any opportunities to reschedule debt by early repayment of more expensive existing loans replaced with less expensive new loans. The premiums payable on early redemption usually outweigh any potential savings. However, the Council and its Treasury Management advisors are exploring one opportunity currently in relation to part of the Council’s debt portfolio which, if successful, may deliver a small revenue saving.

Short Term (Temporary) Borrowing and Investments

In managing the day to day cash-flow of the authority, short term borrowing or investments are undertaken with financial institutions and other public bodies. The City Council currently holds no short term borrowing.

Short term investments were made at an average interest rate of 0.61%. This rate of return reflects low risk investments for short to medium durations with UK banks, Money Market Funds, Certificates of Deposits, other Local Authorities, Registered Providers and companies in the form of corporate bonds.

Although the level of investments varies from day to day with movements in the Council’s cash-flow, investments held by the City Council identified as a snap-shot at each of the reporting stages were:-

	As at 30th September 2016	As at 30th June 2017	As at 30th September 2017
	£m	£m	£m
Banks and Building Societies	54.4	23.4	24.4
Money Market Funds	18.6	26.9	9.9
Local Authorities	0.0	0.0	0.0
Corporate Bonds	34.9	10.4	11.4
Registered Providers	15.0	8.0	8.0
Total	122.9	68.7	53.7

External Investments

In addition to the above investments, a mix of Collective Investment Schemes or “pooled funds” is used, where investment is in the form of sterling fund units and non-specific individual investments with financial institutions or organisations. These funds are generally AAA rated, are highly liquid as cash, can be withdrawn within two to four days, and short average duration. The Sterling investments include Certificates of Deposits, Commercial Paper, Corporate Bonds, Floating Rate Notes and Call Account Deposits. These pooled funds are designed to be held for longer durations, allowing any short term fluctuations in return to be smoothed out. In order to manage risk these investments are spread across a number of funds.

As at 30th September 2017 the pooled funds were valued at £39.9m, spread across the following funds: Payden & Rygel; Federated Prime Rate, CCLA, Standard Life Investments, Royal London Asset Management and Deutsche Bank.

Prudential Indicators and the Prudential Code

Under the CIPFA Prudential Code for Capital Finance authorities are free to borrow, subject to them being able to afford the revenue costs. The framework requires that authorities set and monitor against a number of Prudential Indicators relating to capital, treasury management and revenue issues. These indicators are designed to ensure that borrowing entered into for capital purposes was affordable, sustainable and prudent. The purpose of the indicators is to support decision making and financial management, rather than illustrate comparative performance.

The indicators, together with the relevant figures as at 30th September 2017 are included in Appendix 6. This highlights that the City Council's activities are within the amounts set as Performance Indicators for 2017/18. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 10) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 30th September the value is -£68.6m (minus) compared to +£80.0m within the Treasury Management Strategy, reflecting the fact that the Council has more variable rate investments than variable rate borrowings at the current time.
- The Upper Limit on Fixed Interest Rate Exposures (indicator 10) sets a maximum amount of net borrowing (borrowing less investments) that can be at fixed interest rates. At 30th September the value is £240.1m compared to £400.0m within the Treasury Management Strategy, reflecting that a significant proportion of the Council's investment balance is at a fixed interest rate.

Regulatory Update – MiFID II

Currently, local authorities are treated by regulated financial services firm as professional clients who can “opt down” to be treated as retail clients if they wish. However, from 3rd January 2018 local authorities will be treated as retail clients who need to “opt up” in order to be treated as professional clients. Regulated financial services firms include banks, brokers, advisers, fund managers and custodians but only where they are selling, arranging, advising or managing designated investments.

There are criteria that the authority must meet in order to opt up to professional status. Firstly, the authority must have an investment balance of at least £10m and the person authorised to make investment decisions on behalf of the authority must have at least one year’s relevant professional experience. In addition, the firm must assess that the person has the expertise, experience and knowledge to make investment decisions and understand the risks involved.

The main benefit of not opting up and being treated as a retail client is there is a duty on the firms to ensure that the investment is “suitable” for the client. However, local authorities would still not be protected by the Financial Services Compensation Scheme nor are they eligible to complain to the Financial Ombudsman Service. It is also likely that retail clients will face an increased cost and potentially restricted access to certain products including money market funds, pooled funds, treasury bills, bonds, shares and financial advice.

The Council meets the conditions to opt up to professional status and intends to do so as the costs of being a retail client are thought to outweigh the benefits.

3. Results of consultation undertaken

3.1 None.

4. Timetable for implementing this decision

4.1 There is no implementation timetable as this is a financial monitoring report.

5. Comments from the Director of Finance and Corporate Services

5.1 Financial Implications

Revenue

In line with Quarter 1 the Council continues to face some budgetary challenges from the non-achievement of planned budget savings and due to overspends in a range of housing related and children’s social care budgets. The children’s social care overspend has increased by £1.4m since Quarter 1 and there are strong indications from current trends that this cost pressure is likely to grow. The future implications of this are covered in more detail in the Pre-Budget and Medium Term Financial Strategy Reports being considered by Cabinet on 28th November.

Management focus and activity is continuing in order to achieve existing savings programmes although it is important for Cabinet to be aware that a small number of remaining undelivered savings will prove difficult to deliver. The extent to which these pressures are likely to have a future years impact are being considered as part of the work done in preparation for 2018/19 Budget setting.

At this stage of the financial year the overall bottom line position for 2017/18, whilst challenging, is not a cause for undue concern. Work will continue across areas that are reporting overspends currently to refine the likely outturn position and reduce where possible the level of budget imbalance. Tight budgetary control will be required across other budget areas and where possible within existing policy constraints, officers will seek to deliver budgetary underspends to help mitigate overspends elsewhere. Other options for managing any residual overspend will also be kept under review including any opportunities within corporate budgets to identify one-off areas of flexibility.

It is important to stress that some significant concern is emerging about the Council's future budgetary position as a result mainly of areas that represent intractable long-term demand led issues that require longer-term solutions. As part of the Council's medium term budget considerations, decisions will be required on the extent to which demand led pressures can be safely managed down or more cost efficient service solutions identified. In addition, where existing savings targets remain undelivered, it will be important for savings plans to be clearly set out including the implications and timescale of delivering (or not delivering) these plans.

Capital

Several schemes are now reflecting the likelihood that expenditure will be rescheduled into 2018/19 including £5.3m for Growth Fund external schemes and £3.8m for the City Centre South scheme. The grant conditions surrounding the Growth Funded schemes allows the Council to fund capital expenditure on a cash-flow basis within 2017/18 and therefore reduce the amount of Prudential Borrowing that it is required to undertake in the year.

5.2 Legal implications

None

6. Other implications

6.1 How will this contribute to achievement of the Council's Plan?

The Council monitors the quality and level of service provided to the citizens of Coventry and the key objectives of the Council Plan. As far as possible it will try to deliver better value for money and maintain services in line with its corporate priorities balanced against the need to manage with fewer resources.

6.2 How is risk being managed?

The need to deliver a stable and balanced financial position in the short and medium term is a key corporate risk for the local authority and is reflected in the corporate risk register. Budgetary control and monitoring processes are paramount in managing this risk and this report is a key part of the process.

6.3 What is the impact on the organisation?

In Quarter 2 there is a forecast overspend. The Council will continue to ensure that strict budget management continues to the year-end and will also need to manage overall financial resources to accommodate any overall year-end overspend. Any use of one-off resources to balance the final position means that these resources would not be available to use fund future spending priorities.

6.4 Equalities / EIA

No impact.

6.5 Implications for (or impact on) the environment

No impact

6.6 Implications for partner organisations?

No impact.

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Appendix 1 Revenue Position: Detailed Directorate Breakdown of Forecasted Outturn Position

Appendix 1 details directorates forecasted variances.

Budget variations have been analysed between those that are subject to a centralised forecast and those that are managed at service level (termed “Budget Holder Forecasts” for the purposes of this report). The Centralised budget areas relate to salary costs – the Council applies strict control over recruitment such that managers are not able to recruit to vacant posts without first going through rigorous processes. In this sense managers have to work within the existing establishment structure and salary budgets are not controlled at this local level. The Centralised salaries and Overheads under-spend shown below is principally the effect of unfilled vacancies.

Directorate	Revised Budget	Forecast Spend After Action/ Use of Reserves	Centralised Forecast Variance	Budget Holder Forecast Variance	Net Forecast Variation
	£m	£m	£m	£m	£m
Public Health	0.5	0.1	(0.2)	(0.2)	(0.4)
People Directorate Management	1.5	1.5	0.0	0.0	0.0
Education and Inclusion	12.4	12.5	(0.3)	0.3	0.1
Children and Young People's Services	71.6	76.6	(3.1)	8.1	5.0
Adult Social Care	81.9	81.6	(0.8)	0.5	(0.3)
Customer Services & Transformation	2.8	4.6	0.4	1.4	1.8
Total People Directorate	170.7	176.9	(4.0)	10.1	6.2
Place Directorate Management	4.0	4.0	0.0	0.0	0.0
City Centre & Major Projects Development	7.2	7.3	0.1	0.0	0.1
Transportation & Highways	3.9	4.1	(0.5)	0.7	0.2
Streetscene & Regulatory Services	27.1	27.7	(0.4)	1.0	0.6
Project Management and Property Services	(7.5)	(7.9)	0.1	(0.5)	(0.4)
Finance & Corporate Services	6.9	8.0	(0.1)	1.2	1.1
Total Place Directorate	41.6	43.2	(0.8)	2.4	1.6
Resourcing	20.2	15.5	0.0	(4.7)	(4.7)
Total	232.5	235.6	(4.9)	8.0	3.1

Reporting Area	Explanation	£m
People Directorate	The Directorate's centralised salary underspend against its salary budgets and turnover target is partly as a result of high levels of vacancies in Childrens Social Care, which accounts for £3.1m of the underspend. This is partly offset by non-salary overspend as a result of agency staff in Childrens Social Care. Internally provided services in Adult Social Care contributes a further £0.5m towards the forecast underspend. As part of the Children's Services Redesign vacancy levels and agency expenditure will reduce.	(4.0)
Place Directorate	The vast majority of the variations for centralised forecasts relate to vacancies which have been held pending service review completion, or areas where there has been difficulty in recruiting to posts	(0.9)
Total Non-Controllable Variances		(4.9)

People Directorate			
Service Area	Reporting Area	Explanation	£M
Public Health	Public Health Staffing & Overheads	Savings relating to staffing vacancies and early delivery of savings.	(0.2)
Public Health	Other Variances Less than 100K		0.0
Public Health			(0.2)
Education and Inclusion	Inclusion & Participation	Overspend as a result of a part year delivery of the transport review, against a full year saving.	0.2
Education and Inclusion	School Enrichment Services	Performing Arts Service is forecasting an overspend of £87k mainly due to anticipated shortfalls in income. A service redesign will be implemented in September 2017 which will achieve efficiencies, increase flexibility for customers and assist the service in achieving a break even position. Governor Support is currently forecasting an over spend of £59k due to reduced levels of buyback from schools. A plan is in place to reduce this deficit and the service are currently attending a number of additional meetings as well as actively looking for alternative income streams.	0.2
Education and Inclusion	Adult Education	Target set in corporate plan to switch internal training with ESFA grant funding. To date it has not been possible to identify areas in the Council where this can take place.	0.1
Education and Inclusion	Libraries	Library Service variance due to current predicted overspend due to purchase of self service machines required as part of the Connecting Communities programme.	0.2
Education and Inclusion	Advice and Health Information Services	Resettlement generates corporate income which will be maximised where possible. Under Spend will be used to support spend in other Council services.	(0.4)

Education and Inclusion	Other Variances Less than 100K		0.0
Education and Inclusion			0.3
Children and Young People's Services	LAC & Care Leavers	The overspend is as a result of undelivered savings targets and budgetary control pressure. Approximately £1.8M is a forecast shortfall in delivery of savings reported to the Children's Transformation Board. This is in the area of Looked After Children Placements and is as a result of delays in the delivery of the internal residential provision changes, and slightly slower than forecast increases in internal foster carers and specialist foster carers. This is being closely monitored by the Children's Transformation Board. In addition there is a significant budgetary control pressure as a result of an increase in the number of LAC, which is impacting on the external fostering area of the placements budget. The average LAC numbers in 2016/17 were 587, whereas the discrete numbers at the end of September are in excess of 650. This largely accounts for the increase in forecast from quarter 1. Analysis has identified 2 reasons for this, firstly an increase in UASC (Unaccompanied Asylum Seeking Children) as a result of the national transfer scheme, and secondly changes in court practice which mean it is taking longer to secure permanency options for children and young people, thus inflating LAC numbers. We also have a continued pressure within supported accommodation as a result of high levels of activity. Children's Leadership Team are reviewing all children and young people in placements (both LAC and Supported) to identify how costs can be reduced within the financial year, and as a result have managed to reduce the number of LAC in the most expensive placements.	5.8
Children and Young People's Services	Help & Protection	Overspend relates to the costs of Agency staff covering posts across the service. This is more than offset by underspends across salary budgets. There is also a pressure as a result of grant fall out for the Family Drug and Alcohol Court. It is proposed that this will be resolved as part of the restructure out to consultation, and we are also exploring the possibility of a Social Impact Bond funding model from 2018/19.	1.8
Children and Young People's Services	Commissioning, QA and Performance	Following the Ofsted monitoring visit (and further backed up in the OFSTED Inspection) and significant concerns about the volume and quality of the work of CP chairs and IRO's, it was agreed that 4 additional posts were required on an interim basis. All 4 posts are currently recruited to on an agency basis, and the re-structure out to consultation proposes that these posts are recruited to on fixed term contracts for 12 months, and beyond that subject to review of workload, areas of responsibility and identified budget. We also currently have some other agency staff filling establishment posts, but will continue to recruit to permanent posts.	0.4
Children and Young People's Services	Other Variances Less than 100K		0.1

Children and Young People's Services			8.1
Adult Social Care	Internally Provided Services	The overspends on other pay, overtime and variable allowances are offset by underspends on centralised salary costs due to a number of vacancies.	0.3
Adult Social Care	All Age Disability and Mental Health Operational	Underlying budget pressures continue to rise in part due to increasing demand for complex social care support for eligible service users. Working age adults tend to receive expensive packages of care for a longer period of time. This increases the cumulative cost of services as younger people tend to receive services longer once they enter the care system. Control mechanisms are in place to ensure expenditure is robustly managed. Approval for packages are rigorously scrutinised at panel meetings with social workers required to present their panel submission before approval is gained	0.3
Adult Social Care	Older People Community Purchasing	Budget pressures continue due to market pressures that are leading to increased prices the local authority are paying for services. On-going monitoring of price increases are underway and reported through the managers. Approval for packages are rigorously scrutinised at panel meetings with social workers required to present their panel submission before approval is gained.	0.3
Adult Social Care	Adult Social Care Director	Underspends achieved due to early delivery of Adult Social Care savings targets.	(0.2)
Adult Social Care	Other Variances Less than 100K		(0.2)
Adult Social Care			0.5
Customer Services & Transformation	Customer and Business Services	Unmet element of £1.8m Business Services savings target (£623K) and ongoing pressure relating to homelessness service mainly comprising B&B rental cost not covered by Housing Benefit and agency cost in Housing Options team (£311K). This is partially offset by additional income forecast in Post and Fastprint	0.8
Customer Services & Transformation	HR and Workforce Development Management	Unmet element of savings target linked to resources needed for Workforce Strategy programme (£103k). Additional Resource requirements for Workforce Programme (£90k) as well as agency costs to cover vacant posts	0.2
Customer Services & Transformation	ICT Operations	There is an ongoing pressure with Mobile Phone contracts as the demand for flexible ways of working increases (£227K). This is partially offset by the data and voice budget underspending where older technology has been decommissioned and is no longer needed (£116K).	0.1
Customer Services & Transformation	Other Variances Less than 100K		0.3
Customer Services & Transformation			1.4
Total Non-Controllable Variances - People			10.1

Place Directorate	Place		
Service Area	Reporting Area	Explanation	£M
Transportation & Highways	Traffic	Parking services (£174k): income pressures within parking enforcement due to reduced recovery rates and fewer number of PCNs issued, offset by an increase in bus lane enforcement income. There are also expenditure and income pressures within car parks. Network Management (£153k): primarily within urban traffic control due to anticipated expenditure on agency cover, pressures due to unrecoverable road traffic accident damages to assets and the unfunded energy & maintenance cost of growth in the asset estate	0.3
Transportation & Highways	Highways	Primarily agency cover for vacant posts and unfunded surface water management planning checks, patially offset by capital contributions.	0.3
Transportation & Highways	Other Variances Less than 100K		0.1
Transportation & Highways			0.7
Streetscene & Regulatory Services	Waste & Fleet Services	Fleet services are not as yet fully achieving their vehicle refinancing targets due to high inflation on vehicle acquisition. There are also some additional costs within refuse relating to the purchase of bins, caddies & liners for the redesigned service, plus some additional costs expected to maintain collections over the christmas and new year period. These are partly offset by reductions in the cost of waste disposal and some underspends on PTS.	0.6
Streetscene & Regulatory Services	Streetpride & Parks	Variation as a result of reduced Coombe Abbey car parking income together with temporary agency staff costs required to cover vacancies in the service being held pending the outcome of a review	0.5
Streetscene & Regulatory Services	Planning and Regulatory Services	Variation due to an overachievement of income in Building Control.	(0.1)
Streetscene & Regulatory Services	Other Variances Less than 100K		0.0
Streetscene & Regulatory Services			1.0
Project Management and Property Services	Development Services	Core funded surveyors costs being recovered from sales disposal proceeds.	(0.2)
Project Management and Property Services	PAM Management & Support	£200k underspend against anticipated reduced cost of Lamb St dilapidation costs.	(0.2)

Project Management and Property Services	Other Variances Less than 100K		(0.1)
Project Management and Property Services			(0.5)
Finance & Corporate Services	Revenues and Benefits	There is a net pressure within the Housing Benefit (HB) Subsidy account. The largest pressure (circa £2.1m) is due to the element of HB paid out for bed & breakfast (B&B) accommodation for homeless people which cannot be reclaimed from DWP as HB Subsidy. In addition there is a pressure (circa £1.0m) due to the element of HB paid out for mainly clients in supported accommodation which can only be partially reclaimed from DWP as HB Subsidy. The above two pressures are offset by the surplus recovery of HB overpayments (circa £1.6m)	1.3
Finance & Corporate Services	Legal Services - People	Variation primarily due to the cost of external barrister expenditure which the service is hoping to bring down external costs by greater use of internal resources for court work. In addition there are pressures within Coroners due to increased pathology and venue fees (£60k), offset by increased income from the Registrar's service (£60k).	0.1
Finance & Corporate Services	Financial Mgt	Accelerated achievement of headcount savings target plus 30k savings have been made on non-staff budgets	(0.3)
Finance & Corporate Services	Other Variances Less than 100K		0.1
Finance & Corporate Services			1.2
Total Non-Controllable Variances - Place			2.4

CONTINGENCY AND CENTRAL		
Reporting Area	EXPLANATION	£m
Corporate Finance	This favourable variance reflects less than anticipated expenditure across inflation contingencies (£2.5m), the Asset Management Revenue Account (AMRA) (£0.3m) and the Apprenticeship Levy. It also incorporates a combination of higher than expected grant income relating to Business Rates reliefs and benefit from the Council's participation in the West Midlands Business Rates Pilot (£1.3m).	(4.7)
Forecast Overspend/(Underspend)		(4.7)

Capital Programme: Analysis of Budget/Technical Changes

SCHEME	EXPLANATION	£ m
PLACE DIRECTORATE		
Friargate	As approved at Cabinet on 24th January 2017, early Project Management fees for Friargate WMCA £50m Business Case development costs	0.5
Highways Maintenance & Investment	The purchase of Welfare Units which will initially be funded from the Capital Reserve, to be re-paid back from Place Revenue over the next 5 years.	0.2
Bus Lanes	It has been agreed to extend the trial phase of the suspension of phase 1 of the bus lane review to a full 12 months. Alongside this it has also been agreed that the next phase of bus lane suspensions and the permanent removal of some of the Foleshill Rd bus lanes will commence. The total cost of the next phases of work is £465k of which £160k is to be provided from the existing urban traffic control integrated transport capital pot for 2017/18 and the balance of £305k is to be provided from capital receipts in 2017/18.	0.3
SUB TOTAL - Place Directorate		1.0
TOTAL APPROVED / TECHNICAL CHANGES		1.0

Appendix 3

Capital Programme: Estimated Outturn 2017/18

The table below presents the revised estimated outturn for 2017/18.

DIRECTORATE	ESTIMATED OUTTURN QTR 1 £m	APPROVED / TECHNICAL CHANGES £m	OVER / UNDER SPEND NOW REPORTED £m	RESCHEDULED EXPENDITURE NOW REPORTED £m	REVISED ESTIMATED OUTTURN 17- 18 £m
PEOPLE	23.1	0.0	0.0	0.0	23.1
PLACE	104.9	1.0	0.0	(9.2)	96.8
TOTAL	128.0	1.0	0.0	(9.1)	119.9

Capital Programme: Analysis of Rescheduling

SCHEME	EXPLANATION	£m
PLACE DIRECTORATE		
City Centre South	The £11m forecast capital spend was an estimate taken from the Full Business Case grant application at the point of which it was submitted to the WMCA i.e. November 2016. This was a pro rata figure assuming that land assembly would commence in the second part of 2017/18. In reality, third party land and buildings will be purchased as opportunities arise. The £7m figure is based on more accurate information.	-3.8
GD11 - Coton Arches	Slippage on scheme as a result of delays issuing the works tender whilst WCC worked with utility companies to mitigate costly service diversions. Now issued. Slippage agreed by Programme Delivery Board on the 21st September.	-0.3
GD14 - A46 N-S Corridor (Stanks)	Slippage as a result of the delay issuing works tenders. Delays to the programme are caused by the difficulty obtaining a Section 6 agreement from Highways England to carry out works and revising the land dedication agreement with Opus 40 and Taylor Wimpey. Slippage due to be spent in 2018/19. Waiting for agreement from Programme Delivery Board.	-2.8
GD18 (ULS00) - Unlocking Sites	This was unallocated spend that will be allocated and spent in future years.	-0.7
GD18 (ULS01) - Regeneration of Priory Square, Dudley	This project has had its funding withdrawn (at the Sep 21st Programme Delivery Board and confirmed at CWLEP Board 9th Oct. As no scheme forthcoming)	-0.2
GD18 (ULS02) - Bridge to Living	This scheme is no longer able to progress due to the owners of the retail block pulling out of the scheme	-0.4
GD18 (ULS09) - Getting West Nuneaton Moving: Bermuda Connection	Awaiting confirmation of match funding status – this project has reported slippage, status confirmed by 31/10/17	-1.0
SUB TOTAL - Place Directorate		-9.1
TOTAL RESCHEDULING		-9.1

Appendix 5

Prudential Indicators

Indicator	per Treasury Management Strategy	As at 30th Sept 2017
Ratio of Financing Costs to Net Revenue Stream (Indicator 1) , illustrating the affordability of costs such as interest charges to the overall City Council bottom line resource (the amount to be met from government grant and local taxpayers).	13.53%	13.49%
Gross Borrowing should not, except in the short term, exceed the estimated Capital Financing Requirement (CFR) at the end of 3 years (Indicator 3) , illustrating that, over the medium term, net borrowing (borrowing less investments) will only be for capital purposes. The CFR is defined as the Council's underlying need to borrow, after taking account of other resources available to fund the capital programme.	Year 3 estimate / limit of £474.2m	£362.2m Gross borrowing within the limit.
Authorised Limit for External Debt (Indicator 6) , representing the "outer" boundary of the local authority's borrowing. Borrowing at the level of the authorised limit might be affordable in the short term, but would not be in the longer term. It is the forecast maximum borrowing need with some headroom for unexpected movements. This is a statutory limit.	£470.4m	£362.2m is less than the authorised limit.
Operational Boundary for External Debt (Indicator 7) , representing an "early" warning system that the Authorised Limit is being approached. It is not in itself a limit, and actual borrowing could vary around this boundary for short times during the year. It should act as an indicator to ensure the authorised limit is not breached.	£430.4m	£362.2m is less than the operational boundary.
Upper Limit on Fixed Rate Interest Rate Exposures (Indicator 10) , highlighting interest rate exposure risk. The purpose of this indicator is to contain the activity of the treasury function within certain limits, thereby reducing the risk or likelihood of an adverse movement in interest rates or borrowing decisions impacting negatively on the Council's overall financial position.	£400.0m	£240.1m
Upper Limit on Variable Rate Interest Rate Exposures (Indicator 10) , as above highlighting interest rate exposure risk.	£80.0m	-£68.6m
Maturity Structure Limits (Indicator 11) , highlighting the risk arising from the requirement to refinance debt as loans mature: < 12 months 12 months – 24 months 24 months – 5 years 5 years – 10 years 10 years +	0% to 40% 0% to 20% 0% to 30% 0% to 30% 40% to 100%	12% 4% 13% 8% 63%
Investments Longer than 364 Days (Indicator 12) , highlighting the risk that the authority faces from having investments tied up for this duration.	£24m	£9.8m



Finance and Corporate Services Scrutiny Board (1)
Cabinet
Council

15th November 2017
28th November 2017
5th December 2017

Name of Cabinet Member:

Cabinet Member for Strategic Finance and Resources – Councillor J Mutton

Director Approving Submission of the report:

Deputy Chief Executive Place

Ward(s) affected: All

Title:

Medium Term Financial Strategy 2018-21

Is this a key decision?

Yes - Cabinet and subsequently Council are being recommended to approve the Medium Term Financial Strategy incorporating decisions which have financial implications in excess of £1m

Executive Summary:

This report presents a Medium Term Financial Strategy (MTFS) for adoption by the City Council. The previous strategy was approved in October 2016. The Strategy sets out the financial planning foundations that support the Council's vision and priorities and leads to the setting of the Council's revenue and capital budgets.

Indications are that the government is maintaining its commitment to the current 4 year funding settlement for local government. To qualify for this, the Council approved an Efficiency Plan within the previously approved MTFS for 2017-20.

The Council's Pre-Budget Report is being brought to the same meeting of Cabinet as this MTFS. The final Budget Setting Report will be brought to Cabinet and council in February 2018.

Local authorities continue to face severe financial pressures. Although the previous government policy of targeting a budget surplus by 2020 has been pushed back, uncertainty as a result of BREXIT negotiations and over the future of local government finance means that the pressure on public finances is unlikely to ease significantly in the foreseeable future. This Strategy assumes that reductions in available revenue resources and spending levels are likely to continue.

On a local level, the Council is faced with a challenging and fluid financial position affected by temporary shortfalls in delivery of its existing savings plans and growing costs within Children's Services and services related to housing and homelessness. Notwithstanding the approaches set out in this strategy, the Council will need to maintain a dynamic financial model that takes account of changes in its medium term budget position. This may include adopting some

measures which have a short-term focus or which re-evaluate the Council's approach to financial risk. These will be set out fully at the point of decision making.

In summary, the national and local contexts that frame this Strategy include:

- A paramount need to protect the most vulnerable people in the city including children at risk, children and young people in care, victims of domestic abuse and vulnerable adults and older people;
- Significant reductions in government resources with an expected further fall of c£12m in the next 2 years following reductions totalling c£107m in the 6 years to 2017/18;
- Fast population growth causing greater demand and expenditure pressures in areas such as housing, social care and waste disposal;
- A move towards greater localisation of income, including Business Rates, and uncertainty arising from the review of the Business Rates system and other funding programmes;
- The increasing importance of promoting growth in the local economy;
- The transfer of schools to Academy status putting increasing pressure on the Council's core education functions and other services that trade with the city's schools;
- More complex service delivery models across the Council driven by the need to modernise and rationalise services and work in tandem with partners and neighbouring authorities;
- Continued expectations on the Council to maintain service levels and standards across the full range of core services despite the financial challenges;
- The development of the West Midlands Combined Authority providing a source of financial support for key transformation programmes.

Taken together, these factors represent a combination of reducing resources, challenging underlying economic and demographic conditions, increased demand, a heightened need to improve the quality of services and new challenges represented by government reform and local structural and governance relationships. In these circumstances it is crucial that the Council's financial strategy is both robust and flexible. This will provide the financial foundations required to ensure that Council services are fit for purpose to protect the most vulnerable as well as providing decent core services for every citizen in the city.

In support of these aims, the City Council's strategic financial approach to the demands that it faces includes:

- A Council Plan focusing on economic growth, quality of life and a commitment to protecting the vulnerable, whilst delivering services with fewer resources;
- A Local Plan setting the blueprint for taking the City forward, identifying land to satisfy housing, infrastructure and developmental demand;
- Strong corporate financial planning, monitoring and project management arrangements;
- Growing the city's local income base, within the environment of increasing localisation of funding sources, including Business Rates;
- Managing the demand for services, through digital working and community engagement;
- A transformation programme, including the delivery of major capital investment schemes, to change the way the Council works and engages with its customers, as well as to drive economic growth and the delivery of savings;
- Partnership working, including as part of the West Midlands Combined Authority, together with voluntary organisations and other partners;

- A continued drive towards income maximisation, including investment in commercial ventures within the context of robust risk management arrangements;
- A fundamental commitment to protecting the city's vulnerable children, adults and older people;
- Changing the relationship between the Council and its citizens reflecting the reality that the Council will provide a smaller range and lower level of services in new ways and out of far fewer locations;
- Doing things differently by considering alternative service delivery models and options for delivering service outcomes in different ways with less reliance on Council delivered services;
- A continued Workforce Strategy requiring a significantly smaller workforce working in flexible ways consistent with a modern organisation, ensuring that the Council has the talent in place necessary to deliver the challenging agenda that it faces;
- Seeking to optimise the use of pooled or new funding available to support social care and health;
- Investing in the environmental elements that support the regeneration of the city including its public realm, the city's highways network and its cultural and leisure offer to make Coventry an attractive place to live and work.

Based on the 2017/18 approved budget, the initial financial gap for the following 3 years as at the start of the new Budget Setting round was:-

	2018/19 £m	2019/20 £m	2020/21 £m
Revised Revenue Budget Gap	0.0	0.0	11.4

It is important to be clear as indicated above that the position set out is dependent on the achievement of outstanding savings programmes over the medium term. In total these amount to c£20m and although there are plans in place to deliver the majority of these, there remains up to £6m of savings for which plans still need to be formalised.

The 2020/21 position shown in the table is based on early estimates and could be subject to change. An updated financial position is considered further in the Pre-Budget report.

Recommendations:

- (1) Finance and Corporate Services Scrutiny Board 1 is recommended to consider whether there are any comments/recommendations that they wish to make to Cabinet.
- (2) Cabinet is recommended to:
 - (a) Consider any recommendations from Scrutiny Board 1
 - (b) Agree the report and recommend that Council approve the Strategy.
- (3) Council is recommended to approve the Strategy as the basis of its medium term financial planning process.

List of Appendices included:

None

Other useful background papers:

None

Has it been or will it be considered by Scrutiny?

Yes, Finance and Corporate Services Scrutiny Board (1), 15th November 2017

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, 5th December 2017

Medium Term Financial Strategy 2018-21

1. Context (or Background)

1.1 Background

- 1.1.1 This Strategy sets out the financial planning foundations that support the setting of the Council's revenue and capital budgets. Last year's Strategy also included an Efficiency Plan which was required by government as part of the 4 year funding settlement. The principles of the Plan continue to apply and are reflected in this proposed Medium Term Financial Strategy, although local authorities are not being required to produce a separate Efficiency Plan this year.
- 1.1.2 Local authorities will continue to face severe financial pressures for the foreseeable future. From 2016/17 government, provided local authorities with 4 year funding settlements, with the aim of providing greater certainty for authorities in planning their budgets. However, the country's move towards Brexit and the subdued level of economic growth mean that significant uncertainties remain across a number of areas, including, for example, the way that the role of Combined Authorities will evolve, the shape of any future Government Fair Funding review of local authority resource distribution, the implementation of localised Business Rates and the overall level of funding available to local authorities.
- 1.1.3 Resources available to Coventry have reduced significantly with a fall of c£107m over a six year period to 2017/18, whilst the most recent Settlement Funding Assessment for Coventry shows annual reductions to 2019/20 with a total further fall of £12m over the coming two years.
- 1.1.4 Within this environment of downward pressure on resources, the Council has delivered very significant savings and in broad terms the more straightforward savings have already been made. This Medium Term Financial Strategy forms part of the process to refresh the Council's strategic approach to the nature and scale of services it provides in the context of the need to close future budgetary gaps.
- 1.1.5 Approaching the current Pre-Budget process, the Council's financial position has worsened as a result of shortfalls in delivery of its existing savings plans and growing costs of looked after children and homelessness. The Council's current medium term budget process will need to be applied flexibly and may for instance require the adoption of measures which have a more short-term focus or re-evaluate the Council's approach to financial risk. Where this is necessary, the implications will be set out in full as part of the decision making process.

1.2 National and Local Context

- 1.2.1 Apart from the increasing financial pressures that all public bodies face, there is a range of developments set out below, which impact on the City Council:-
- The development of the West Midlands Combined Authority (WMCA), of which the Council is a member, as a route to maximising investment in Coventry to drive growth and more efficiently co-ordinate services across the sub-region. The WMCA's Devolution Deal plans to provide financial support in 2 broad areas: City Centre South and Friargate (£150m capital) and transport/connectivity (£370m capital). The precise arrangements and processes through which WMCA programmes are delivered will continue to develop through the course of the MTFs planning period.

- The stated government intention to move towards localising 100% of Business Rates. This localisation, as well the uncertainty arising from the review of the Business Rates system, offers the prospect of authorities benefitting from growth, but with the corresponding downside risk of falling local income bases or the Government expecting localised Business Rates to fund a disproportionately large range of new services. The changes required to move to 100% localisation do not appear to be included in the Government's current legislative timetable so it is now likely that this will be pushed back beyond 2020. However, prior to full localisation the Council continues to be part of the West Midlands business rates pilot scheme through which 99% of business rates are retained locally with the benefits of this being shared between the Council and the WMCA, and a "no detriment" clause to protect the Council against any adverse movements.
- The operation of integrated social care and health services within the Better Care Fund, now within the context of Sustainability and Transformation Plans across the health sector. This area continues to operate within a very dynamic environment with expanding adult social care user numbers and increasingly complex care packages.
- The increasing focus of local authorities on wider commercial sources of income, including investment in commercial property has the potential to expand the resource base, but also present authorities with different types of financial risk which need to be managed. Nationally, the development of the Prudential and Treasury Management codes will require local authorities to manage their exposure to these risks both through existing processes, such as the Treasury Management Strategy, and potential new ones such as a Capital Strategy.
- The critical importance of regeneration and economic growth, particularly in the light of the planned changes to Business Rates. Within the regeneration arena, the next few years are likely to see significant fluidity in the range of funding streams available from European and sub-regional sources as a result of Brexit and the development of the Combined Authority.
- The city's rapid population growth and the consequent demographic and socio-economic trends are causing increases in demand or expenditure pressures in areas such as social care and waste disposal. The costs of housing homeless individuals and families has emerged as a significant additional cost pressure more recently and now represents one of the most challenging financial developments facing the Council.
- The continued difficult economic circumstances for many, affecting the number of people seeking to access local government and voluntary sector services.
- A schools sector which continues to experience greater fragmentation with the move towards free and academy schools, although the intention to force all schools to commit to becoming academies by 2022 has been dropped. This changing face of local education provision and reducing role of councils is putting more pressure on the remaining rump of local authority education services and finances.

1.2.2 Coventry has significant potential for growth with two global universities, an unrivalled location, exceptional transport infrastructure links and a talent pool for employers to recruit across the region. The city has a growing population and a continued high enterprise growth rate. However, the local economy needs to grow and, for example, the city's Gross Value Added per head (an average level of economic value generated per person) ranks significantly below the national average.

1.2.3 The financial starting point for the Council's MTFs is the forecast 3 year balanced programme to 2019/20 as at budget setting in February 2017. This reflected resourcing assumptions, including for example the continuation of a 3% Adult Social Care precept into 2018/19 and the impact of Business Rates retention through the regional pilot scheme as well as the delivery of existing programmes. Moving the three year planning horizon on by one year, financial year 2020/21 is showing a significant starting budget gap of £11m. The Pre-Budget Report, which will be considered by Cabinet at the same meeting as this report, sets out the detailed financial position over the next 3 years, including emerging pressures and the non-delivery of programmed savings, together with potential technical savings to partially offset the impact of these. More recently, the Quarter 2 2017/18 Financial Monitoring Report sets out a forecast overspend in the year of £3.1m, highlighting significant pressures, with the potential to impact on future years.

1.2.4 The current Capital Programme approved in February 2017 is:-

	2018/19 £m	2019/20 £m	2020/21 £m
Capital Programme Spend	199.2	98.1	74.3

1.2.5 This Programme, provided for a number of large investment programmes across the city including the construction of the City Centre Leisure Facility; Coventry Station Masterplan and regionally significant infrastructure schemes through the UK Central Connectivity programme, as well as investment in school buildings and business development. The major proportion of the total planned capital spend of £372m over the next 3 years is being met from grant (£276m), including significant sums through the WMCA, and also prudential borrowing (£76m). Although the level of prudential borrowing in recent years has been low, this has in part been due to the temporary use of grant received up front prior to the implementation of the various capital schemes. The higher level of prudential borrowing assumed in the Programme is based on a more limited capacity to temporarily use grants in this way. The position will be updated in the Pre-Budget Report.

1.2.6 The Council's revenue reserve balances totalled £51.3m as at 31st March 2017 with a further £30.2m of capital reserves that are only available to fund major capital schemes. These are being reviewed in order to assess their adequacy for current known liabilities and approved policy commitments, with the objective of releasing reserves where they can be better used to drive efficiencies and service improvement. The make-up of the Council's reserves as at 31st March 2017 was:

	Balance at 31st March 2016 £000	(Increase)/ Decrease £000	Balance at 31st March 2017 £000
<u>Council Revenue Reserves</u>			
General Fund Balance	(3,823)	689	(3,134)
Private Finance Initiatives	(11,771)	463	(11,308)
Potential Loss of Business Rates Income	(2,670)	700	(1,970)
Early Retirement and Voluntary Redundancy	(12,500)	4,239	(8,261)
Birmingham Airport Dividend	(4,400)	0	(4,400)
Children's Social Care	(2,000)	2,000	0

Leisure Development	(876)	(18)	(894)
Public Health	(1,037)	297	(740)
Health and Social Care Schemes	(280)	280	0
Troubled Families	(701)	15	(686)
Insurance Fund	(2,402)	616	(1,786)
Management of Capital	(2,337)	(3,229)	(5,566)
Other Corporate	(2,343)	1,370	(973)
Other Directorate	(6,920)	(1,905)	(8,825)
Other Directorate funded by Grant	(3,101)	298	(2,803)
Total Council Revenue Reserves	(57,161)	5,815	(51,346)
<u>Council Capital Reserves</u>			
Useable Capital Receipts Reserve	(6,660)	(13,829)	(20,489)
Capital Grant Unapplied Account	(5,736)	(4,001)	(9,737)
Total Council Capital Reserves	(12,396)	(17,830)	(30,226)
Total Council Reserves	(69,557)	(12,015)	(81,572)

1.2.7 Separately, balances for the Council's local authority maintained schools stood at £22.6m at 31st March 2017

School Reserves

Schools (specific to individual schools)	(19,983)	1,857	(18,126)
Schools (for centrally retained expenditure)	(5,841)	1,348	(4,493)
Total School Reserves	(25,824)	3,205	(22,619)

2. Options Considered and Recommended Proposal

2.1 The remainder of the report contains the proposed Medium Term Financial Strategy. It is recommended that Cabinet and Council approve the Strategy subject to any comments or changes from Finance and Corporate Services Scrutiny Board. The Strategy is structured around the following core elements:

- The Council Plan;
- Strategic Policy Assumptions within the MTFS;
- Strategic Financial Management Framework.

2.2 Council Plan

2.2.1 The MTFS rests on the principles, visions and priorities set out for the City within the Council Plan 2016-2024, which was revised in August 2016. In summary these are:

- Globally Connected;
- Locally Committed;
- Delivering our Priorities with Fewer Resources.

The full plan is available on the Council's website or via the following link: [Coventry Council Plan - August 2016](#)

2.3 Strategic Policy Assumptions within the MTFS

2.3.1 The policy assumptions that will drive the Council's financial strategy are set out below:

2.3.2 The Council's **transformation programme** is centred on the following overlapping strategies: Connecting Communities, Kickstart, incorporating Customer Journey, the Workforce Strategy and Children's Services Transformation. Most of these strategies are aligned to and are being driven by an extensive rationalisation of the Council's office accommodation, investment in new technology to support agile working and an improved customer experience including a shift towards enabling the Council's customers to self-serve on line. A number of capital investment projects are key components of transformation. Capital projects will only go forward on the basis of a sustainable financial model.

2.3.3 In addition to this however, the Council is moving into a new phase of Budget planning that will require a fresh look at some major areas of expenditure and how it can deliver the savings required to deliver a balanced budget. This will include policy led consideration of which services are provided, whether it is appropriate for the Council to continue to deliver them in the same way and whether there are some new and innovative approaches to delivering services. At the same, a line by line review of the Council's budget is being undertaken, led by the Cabinet Member for Strategic Finance and Resources.

2.3.4 The engagement in partnership working is central to the delivery of the Council Plan and the MTFS, through:-

- The Council's membership of the West Midlands Combined Authority providing the opportunity to maximise investment in the city and work more efficiently across the region;
- Integrated working of Health and Social Care through the Better Care Fund;
- Partnership with various stakeholders in driving economic growth;
- Engaging voluntary bodies in order to develop alternative delivery models to enable local services to be delivered at a reduced cost.

2.3.5 The Council will continue to drive towards Income Maximisation through a number of routes:

- maintaining the Council's default position that fees and charges should increase annually in line with inflation;
- generating capital receipts where there is a clear business case for doing so by disposing of property and thereby providing funds for capital reinvestment in services, driving growth or making savings through the repayment of debt.

2.3.6 In addition, the Council will also consider investing in more commercial ventures (e.g. property investment, share purchase or commercial loan finance), in order to secure a financial return or to give opportunities for important local organisations or businesses to develop and flourish. In doing this the Council will robustly assess risk as part of individual project appraisals as well as through strategic risk management strategies. The starting point for this type of arrangement is that it will be no worse than cost neutral to the Council and that it will support the regeneration of the city and/or that it will protect the Council's financial or strategic interests. At the time of writing current proposed changes in regulatory and governance requirements on local authorities indicate that commercialisation will have to be considered robustly within the context of the Council's Treasury Management and Capital Strategies.

2.3.7 Through the Local Plan, the Council is seeking to take the city forward by working closely with its neighbours and partners. In order to drive further growth the plan identifies land to satisfy the demand for homes, community and commercial uses, as well as addressing the need for digital connectivity and the right infrastructure.

2.3.8 The Capital Programme will continue to be resourced from a number of sources including: prudential borrowing, capital receipts and grant. The Council will seek to minimise the revenue funding of capital, in particular where the capital expenditure is of a one-off nature.

2.3.9 The Council is obliged to work towards ensuring that its pension liabilities within the West Midlands Pension Fund are funded. The Council's level of funding last reported was at 77%. The Council's contributions to the pension fund have increased significantly in recent years and, following the latest triennial review, stand at 27.3% from 2017/18. As an alternative to making monthly payments, in order to efficiently manage the burden of contributions, an upfront payment of £93m was made in 2017/18 to cover the next 3 years. The Council will continue to work with the West Midlands Pension Fund to agree employer pension contributions that strike a balance between increasing the funding level over the long-term and maintaining sustainability and affordability in relation to the Council's overall financial position.

2.4 Strategic Finance Management Framework

2.4.1 The Strategic Financial Management Framework encompasses the Council's strategic financial management processes and also the key financial assumptions on which the MTFS rests.

2.4.2 The financial management processes that underpin the MTFS are:-

- A corporate planning and monitoring process that considers capital and revenue together;
- Overall direction undertaken by Strategic Management Board (SMB);
- A framework founded on delegation and clear accountability, with budgets managed by the designated budget holder, reported through Directorate Management Teams, SMB, Cabinet and Audit and Procurement Committee;
- A drive to identify efficiencies and achievable savings to enable the Council to optimise delivery of its policy priorities;
- Strong project management approaches, including a specific focus on cost control;
- Where feasible, the establishment of a balanced revenue budget and capital programme over the medium term planning period.
- The management of reserves in a way that supports the MTFS and the Council's priorities. In particular, the City Council's approach is based on:
 - A policy that reserves are not to be used to: (i) meet on-going expenditure or (ii) fund capital expenditure other than for mostly short life asset rolling programmes or in exceptional circumstances, for capital schemes of major importance;
 - The classification of reserves as a corporate resource, with Cabinet via Strategic Management Board considering the application of budgeted amounts unspent at year end;
 - Holding reserves for a clearly identifiable purpose. This will include protecting against known or potential liabilities, at a minimum level consistent with adequate coverage of those liabilities, taking into account the overall level of risk faced by an organisation of the City Council's size.

2.4.3 The key financial or technical assumptions that underpin the MTFs are:

- The Council will plan for funding levels in line with those set out by government as part of the multi-year settlements for local authorities. Current plans are based on no significant unforeseen financial changes to local or central government finances;
- As a technical assumption, Council Tax increases of just under 2% per annum and one further Social Care precept increase of 3% in 2018/19. This will be subject to political debate and decision as well as any changes at a national level;
- 1% p.a. pay awards will be assumed until 2019/20 in line with indicative Government announcements. Subsequent to its initial announcement of the 1% level, the Government has indicated subsequently that some public sector awards will be above this. This area will be kept under close review over the coming months and it is expected that the Council will reflect national pay awards;
- Business Rate income will be assumed to be inflated broadly in line with recent CPI inflation levels but flexed each year where shorter term inflation expectations dictate.
- Planning on the basis of the underlying Council Tax-Base growing at 0.6% per annum in line with historical trends but flexed each year where shorter term expectations dictate;
- The budget for the Council's Asset Management Revenue Account will continue to be reviewed annually in detail as part of the MTFs, taking into account any impact of changes in: the capital programme, cash-flow forecasts, the level of provision to repay debt through Minimum Revenue Provision (MRP) and forecast interest rates. The Council's Minimum Revenue Provision (MRP) policy will be based on an approach that is both prudent and affordable in a way that reflects the long term nature of local authority debt and assets;
- Forward financial estimates will be guided by existing CPI inflation levels in line with practice adopted across a broad range of public sector areas. This will provide the financial planning benchmark for increases in fees and charges and any areas of expenditure subject to specific inflation requirements assessed by the Director of Finance and Corporate Services. Actual increases in fees and charges will depend upon local factors such as the need to generate sufficient income to meet the cost of trading services. The majority of non-employee based expenditure budgets will not be inflated – the assumption will be that continued procurement and commissioning work plus underlying efficiency savings and the reduced purchasing requirements of some services will deliver savings equivalent to the cost of inflation. A number of areas subject to external contracts are more likely to reflect inflation patterns dictated by pay inflation and this expectation will be built into Council budgets in the affected areas.

3. Results of consultation undertaken

- 3.1 No consultation has been undertaken as part of the MTFs. The implementation of the Strategy through Budget Setting and other individual projects, programmes and initiatives will be accompanied by specific consultations as appropriate.

4. Timetable for implementing this decision

- 4.1 The MTFs will underpin the proposals and approaches that will be set out in the forthcoming Pre-Budget Report and will be implemented in parallel to the proposals for setting the 2018/19 Budget.

5. Comments from the Director of Finance and Corporate Resources

5.1 Financial implications

The main body of this report is concerned wholly with financial matters. It is important that the assumptions and principles detailed in the Strategy are adopted in order for the City Council to be able to deliver balanced budgets over the medium term. Taking into account both the strategic policy and financial management assumptions set out in the report, a revised projected gap will be set out in the forthcoming Pre-Budget Report.

Moving into the 2018/19 Budget Setting process there is an initial forecast gap of £11m in 2020/21 which is expected to rise further in the years beyond that. In addition, the Pre-Budget Report for 2018/19 to 2020/21 sets out some further developments which are affecting the Council's Budget position adversely over this period. It is clear that Coventry faces the challenges and major policy choices faced by many other authorities and the size of the gap makes it inevitable that areas not previously considered will now need to be reviewed with some services being delivered differently or quite possibly not at all. In addition, the Council will need to consider some financial approaches that provide some flexibility allowing a relatively short-term focus. This in turn will provide more time to identify further necessary structural changes to the Council's services. These approaches may include but will not be restricted to; the use of reserves, the use of Capital receipts, repayment of debt, investment in property and other investment assets, application of the Council's Minimum Revenue Provision policy and updating estimates of the Council's Business Rates and Council Tax resources.

5.2 Legal implications

The proposals in this report provide the foundations to allow the Council to meet its statutory obligations in relation to setting a balanced budget by mid-March each year, in accordance with Section 32 of the Local Government Finance Act 1992 and section 25 of the Local Government Act 2003.

6. Other implications

6.1 How will this contribute to achievement of the Council's Plan

The Council will continue to be faced with challenging resource constraints in the coming years. Whilst the focus is to identify additional income generation and savings options that are intended to have as little adverse impact as possible on services, this will not always be possible, and it is inevitable that changes will have a more marked effect on front-line services. Within these very difficult circumstances, the MTFS is closely aligned to the Council Plan priorities that are so critical to ensuring the city's success.

6.2 How is risk being managed?

Inability to deliver a balanced budget is one of the Council's key corporate risks. The proposals within this report are aimed at mitigating this risk by providing a robust platform from which to deliver balanced budgets.

6.3 What is the impact on the organisation?

The Council will need to make some decisions about which are its core priorities and which services it considers that it can no longer afford. It will also need to become more flexible about the mechanisms through which it delivers its services. In addition, the Council continues to use Early Retirement/Voluntary Redundancy opportunities as the key mechanism by which it is able to reduce staffing levels across the Council. It is anticipated that this mechanism will continue to be used and that the Council will continue to reduce employee numbers over the course of the Strategy. However, changes to the landscape of pensions regulation are expected over the next few years and these may

affect the way in which Early Retirement/Voluntary Redundancy programmes are managed.

6.4 Equalities / EIA

Equality impacts that flow from proposals within the Council's budget will be subject to assessment prior to the relevant decisions being taken. The Pre-Budget Report will provide a further indication of how any equality issues will be managed.

6.5 Implications for (or impact on) the environment

No specific impact

6.6 Implications for partner organisations?

Implementation of the Council's financial plans continue to affect the way it works with some of its partners and the implications of these changes need to be managed in consultation with partners as individual changes are identified.

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Members: Cllr John Mutton	Cabinet Member for Strategic Finance and Resources		27/10/17	2/11/17

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Cabinet

28th November 2017

Name of Cabinet Member:

Cabinet Member for Strategic Finance and Resources – Councillor J Mutton

Director Approving Submission of the report:

Deputy Chief Executive, Place

Ward(s) affected:

All

Title:

Pre-Budget Report 2018/19

Is this a key decision?

Yes

Cabinet is being recommended to approve, as a basis for consultation, the spending and savings proposals for 2018/19 and future financial years as adjustments to the Council's Budget.

Executive Summary:

This report outlines as a basis for consultation a set of new revenue budget proposals for 2018/19 to 2020/21 and an overall Council Tax increase for 2018/19 of c4.9% including 3% to reflect funding for Adult Social Care as allowed for within Government guidelines. The final Budget proposals and the Council Tax increase will be subject to Council approval in February.

The Council remains committed to seeking to protect its most vulnerable citizens and to delivering a range of core services to everyone in the city at a time of recent large reductions in Government funding. In last year's budget setting process, the Council approved proposals to deliver a balanced three year position to 2019/20. This was achieved through a combination of changes to the way that some services are delivered and efforts to increase the Council's degree of self-sufficiency through increased tax revenues and commercial/technical approaches.

Moving forward into a new 3 year planning period incorporating financial year 2020/21, an updated position is included within this report reflecting revised estimates and new areas of expenditure pressure and savings proposals. The Council is faced with new financial challenges stemming from uncertainty around the Local Government finance environment, greater external pressures in some of its demand led services and continued challenges in driving through the most recent savings targets within its own budgets. The Council's projections of the overall position has worsened significantly in recent months and it is very unlikely that it will be in a position to present a balanced medium term budget in February. Based on the proposals within this report there is a budget gap over the next three years of £3m rising to £19m.

The financial proposals are based on the funding set out in the Local Government Finance Settlement announced in February 2016 – an equivalent 2018/19 Settlement Funding Assessment reduction for the Council of £6.3m as part of the Government’s 4 year settlement. This is not expected to be altered significantly in forthcoming Government announcements in December and February.

Further work will be undertaken to address the 2018/19 Budget gap outlined in this report between now and the final Budget Report in February. Details on individual spending and savings are provided in Section 2 and on a line by line basis in Appendix 1.

Recommendations:

Cabinet is recommended to:

- (1) Approve the content of the report, the revenue spending and savings options in Section 2 and Appendix 1 and the broad Capital Programme proposals in section 2.6 as the basis for the Council’s statutory budget consultation process; and
- (2) Approve the proposed approach on Council Tax in Section 2.7.

List of Appendices included:

Appendix 1 – Pre-Budget Financial Proposals

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?

No

Report Title: Pre-Budget Report 2018/19

1. Context (or background)

- 1.1 The Council has received £107m less core Government grant in 2017/18 than the equivalent figure it received in 2010/11. The four year settlement announced by Government in February 2016 confirmed additional reductions including a further £6m in 2018/19. By 2019/20 the total loss will amount to c£119m per annum.
- 1.2 Confirmation of the Government's proposed Settlement Funding Assessment (SFA) for the Council will be contained within the Provisional Local Government Finance Settlement to be released probably in the week leading up to Christmas. The final settlement announcement is expected in late January or early February 2018. The Council's existing participation in the West Midlands 100% Business Rates Retention Pilot will continue into 2018/19, the projected benefits and no detriment basis of which were set out in the 2017/18 Budget Report. Due to the fact that the Council is effectively operating under a 100% Business Rates scheme and as a result of continuing reductions in its SFA, the Council will be subject to a tariff of c£11m in 2018/19. This is required to be paid over to Government as part of the overall Local Government funding model.
- 1.3 When the 2017/18 Budget was set, the Council had a balanced budget position for both 2018/19 and 2019/20. However, it has become clear that some existing savings plans cannot now be delivered to the original timescale. In addition the Council is faced by some additional demand led pressures, the most significant of which reflect a number of societal and social-economic factors that are affecting a number of councils across the country. This position has created budget shortfalls of £12m and £10m (after identified budgetary pressures) over the next two years.
- 1.4 In 2020/21, which fell outside of the three year balanced budget approved in February 2017, the initial projected budget gap (after identified budgetary pressures) is £21m. The Government's current plans for Local Government Funding beyond 2019/20 could be subject to the combination of a new national Spending Review, a revised allocation model within the Local Government sector and a new national 100% Business Rates model. As a result there is huge uncertainty around Local Government funding which makes it impossible to provide a robust financial forecast at this stage. Nevertheless, initial assumptions and existing trends are sufficiently firm to indicate that there will in all certainty be a substantial gap for that year. The view of the Council's Director of Finance and Corporate Services is that the Council should be planning for such a position.
- 1.5 The City Council's Medium Term Financial Strategy (MTFS) which is being brought to the same meeting of Cabinet as this report sets out further national and local context in which the Council is operating. Also, prior to setting the final Budget in February, the Council will be required by law to establish the Council Tax and Business Rates tax-bases for 2018/19 and declare any projected deficits or surpluses from previous years.
- 1.6 Sitting behind the overall financial approach is the Council's commitment to protect its most vulnerable citizens and to deliver a range of core services to everyone in the city. However, the Council's message to Coventry citizens is that it faces an increasingly difficult task to achieve this at the same time as dealing with continued austerity. In order to balance its Budget the Council is taking the following broad approaches:
 - Overhauling and modernising Council services including changes to service provision that require a different set of customer expectations and behaviour as well as the way that Council employees work.

- Being honest with its citizens about the need to make savings in and cuts to some services including the proposals considered as part of previous Budget reports.
 - A focus on ensuring that the Council optimises the full-range of income sources that affect its overall budget including Council Tax and Business Rates revenue, external specific grants, fees and charges and other elements of income from commercial activities including loan finance and returns from property and treasury investments.
- 1.7 This report proposes that the budget consultation is carried out on the basis that the Council will increase Council Tax levels by just under 5% including a 3% Social Care Precept, the maximum amount allowable by Government without triggering a referendum.

2. Options considered and recommended proposal

- 2.1 The remainder of the report details the financial position facing the Council and the specific proposals put forward for consultation. These proposals are set out within Appendix 1.
- 2.2 Following the 2017/18 Budget Report the Council faced a balanced budget for 2018/19 and 2019/20 with a gap of £11m in 2020/21. A number of changes to technical assumptions, budget pressures and savings plans that have not yet been delivered since then have created a revised budget gap over this period.
- 2.3 There is a range of key new issues that are putting renewed pressure on the Council's financial position, the three most significant of which are outlined below. The full list including a number of smaller cost pressures are detailed in Appendix 1.
- The Council's Children's Services continue to face challenges from high and increasing demand. This is causing new budget pressure from the cost of care packages for looked after children and the costs of supported accommodation.
 - There is a range of pressures across Council services that reflect the growth in homelessness in the city resulting in Housing Benefit costs that the Council is not able to recover from Government and the costs of households subject to the benefits cap and families with no recourse to public funds.
 - There is an anticipated shortfall in the delivery of savings set previously which were anticipated would be achieved in 2018/19 and beyond. Savings programmes set since 2015/16 total over £50m and current estimates indicate that over 90% are expected to be achieved to previously indicated timescales. However, the remaining savings are proving more difficult to deliver and there is likely to be a shortfall in achievement of £5.6m in 2018/19 as set out in Appendix 1. The majority of the shortfall is within Children's Services and the cost pressures referred to above make it more difficult to meet budget savings based on reductions in workforce numbers and transformational change. Given the nature of these savings and the current early stages of progress in delivering them it is unrealistic to expect them to be delivered in full within 2018/19 and this requires an adjustment to reflect this shortfall. It should be noted that delivery of the remaining savings programmes will continue to be a key budget risk in 2018/19.
- 2.4 A number of the issues that are helping to close the budget gap represent technical realignments of the budget that will not have a significant impact on services or citizens. The major ones are described briefly below:

- Council Tax-Base - This represents a significant growth in the level of Council Tax income that is likely to be available. It reflects increases in the city's tax-base and continuing falls in the level of Council Tax Reduction Scheme payments and includes known and estimated surpluses brought forward from 2016/17.
- Asset Management Revenue Account - This incorporates the revenue financing costs of capital spending and the confirmed cash-flow benefits of the Council's prepayment of pension contributions to the West Midlands Pension Fund covering the period up to 2019/20.
- Salary/Inflation Contingencies – Planned amounts set aside for issues including pensions auto-enrolment and payroll contingencies are now expected to be lower than previously budgeted. Payroll budgets continue to be planned based on an assumed 1% pay award. Any future decision to provide for a pay award above this threshold would cause a cost pressure for the Council.

2.5 If all these adjustments are incorporated there are still significant budget gaps over the medium term summarised in Table 1 below. The budget gap is forecast to be £2.8m in 2018/19 rising to £19.1m in 2019/20. Further proposals will be brought forward as part of the final Budget Report which will ensure that a balanced budget position is achieved in 2018/19. Whilst this, and a balanced position within 2019/20, look to be realistic within current known financial parameters the position clearly becomes far more serious in 2020/21. This is explored more fully in section 5.1.

Table 1: Overall Financial position 2018/19 to 2020/21

<u>Summary Position</u>	2018/19	2019/20	2020/21
	£000	£000	£000
Initial Budget Gap	0	0	11,419
Delayed Delivery of Existing Savings	5,601	4,032	3,477
Emerging Budgetary Pressures	6,123	5,608	6,110
Technical and Corporate Savings	(8,900)	(6,000)	(2,000)
Current Budget Gap	2,824	3,640	19,006

2.6 The Council's draft five year capital programme until 2022/23 totals over £500m, of which £237m is currently cash-flowed for 2018/19. The programme sees some major schemes start their early stages of works in particular for Coventry Station Masterplan (out for planning approval) and final approval from WMCA for £39m of funding and the early phases of the Whitley infrastructure programme.

In addition the Friargate and City Centre Destination Facility are coming to the end of their construction life alongside regular capital programme investments such as the highways programme. Below is list of some of the specific schemes within the City Councils current draft Capital Programme for 2018/19;

- West Midlands Combined Authority funded schemes including City Centre Regeneration and Friargate at £58m and Uk Central and Connectivity at £43m.
- Continued development of the Coventry Station Masterplan and NUCKLE 1.2 schemes (£23m).
- £24m of Local Enterprise Partnership Growth Funded Schemes to parties outside the Council led Programme.

- £20m of investment in the first phases of the Whitley Infrastructure works. This will rise to a £60m scheme – 100% funded from external partners.
- £22m continued investment in Public Realms works including works on the the ring-road and multi storey car parks.
- Continued investment in the Education Capital Programme in particular for Schools of £17m, including provision for the expansion of secondary places.
- Final phase of the City Centre Destination Leisure Facility (£15m).
- Continued provision for Social Care activities including Pathways to Care and Disabled Facilities Grants (£3m) plus the ICT Programme (£2m).

The draft programme will be subject to change between now and February with every expectation that some of the proposed expenditure profiling above being shifted to later years. Given the large amount of externally funded and driven proposals within the Council's Capital Programme it is very likely that a fair degree of flux will continue to be experienced over the next few years.

2.7 Council Tax

In 2017/18 the Council increased its Council Tax by just under 5%, the limit above which it would have been required to seek referendum approval from Coventry voters. The financial position built into this report is based on an equivalent rise of just under 5% in 2018/19. This incorporates an underlying increase of just under 2% and a further 3% to support Adult Social Care costs allowed for within the Government regulations. Final Council Tax proposals will be confirmed in February once the 2018/19 settlement is known.

3. Results of consultation undertaken

- 3.1 Given the relatively low impact of the recommendations within this report the proposals will be subject only to statutory consultation requirements. The Council will communicate the report's key messages through usual means including social and digital media.

4. Timetable for implementing this decision

- 4.1 If approved, the proposals identified within this report will be implemented from 1st April 2018 in line with the profile set out in Appendix 1. This report does not authorise spending and savings decisions. This will happen in the final Budget Setting report in February.

5. Comments from Director of Finance and Corporate Services

5.1 Financial implications

The proposals in this report are wholly concerned with financial matters. In several key ways they reflect challenges that are common to a number of similar authorities across the sector in terms of emerging cost pressures and delivering challenging transformation targets. The balanced 3 year budget set in February 2017 put the City Council in a better position than many authorities and for this reason the Council should be able to balance its budget for 2018/19 and 2019/20 without the need for very large additional savings across services. However, unless there is a significant shift in national funding arrangements in the Council's favour, financial year 2020/21 threatens to be a very challenging one. Neither this report nor the final Budget report in February will offer solutions to balance 2020/21 at this stage. However, the Council's Strategic Management Board and its Director of Finance and Corporate Services intend to initiate early work to identify ways in which the Council can start to meet the budget gap indicated.

There is no expectation of significant uncertainty over the assumptions for the Council's funding position in 2018/19. Therefore, the work to finalise the 2018/19 Budget for February will focus mainly on fine-tuning (and ameliorating where possible) the cost pressures

identified as well as the Corporate/technical measures including its Council Tax tax-base, capital financing costs and any one-off measures that can be used in line with the Council's Medium Term Financial Strategy.

The potential changes to the local government finance system expected from 2020/21 that are outlined in section 1.4 could have a profound impact on the whole sector and it is impossible at this stage to predict what these may be. Current financial assumptions for the Council are based on the continuation of existing trends which means the likelihood of further reductions in resources.

There are no proposals at present to increase the use of one-off resources to fund the Council's overall revenue budget beyond those approved last year. Such measures are not sustainable over any significant length of time and the strong preference is to avoid doing so. However, it may be necessary to implement such measures where the pressures are perceived to be short term and where there are plans to achieve a sustainable budget position in the medium term.

Although the Council has worked hard to achieve greater efficiency in its services, the requirement to reduce its budgeted expenditure makes it inevitable that reductions in the level or quality of service will be felt in some areas through proposals made in previous budget reports which will continue to be implemented over the next two financial years. However, no new savings are being proposed as part of this report. The Council's medium term focus remains on helping Coventry become a growing and more prosperous city. This will help protect and increase key Council revenue streams in the form of Business Rates and Council Tax and reduce the reliance of some local residents on Council services. Signs continue to emerge that this strategy is taking effect and it is vital that investment in the city's future continues to consolidate this. In addition, the Council is adopting some more commercial approaches that will help it to achieve some new and increased revenue streams. These approaches are outlined in the Medium Term Financial Strategy and have already resulted in a number of decisions. The view of the Director of Finance and Corporate Services is that the Council must increase its own financial robustness and self-reliance in order to support the fundamental services that protect the most vulnerable citizens which it is responsible for.

Notwithstanding the very difficult position facing the Council's revenue budget, there is a continued trend for the Council to propose a large and expansive Capital Programme. This encapsulates several key features: successful efforts to attract external grant funding, working with local partners to lever in funding for important projects often with a sub-regional dimension and flexible use of existing budgets to self-fund schemes from Prudential Borrowing. This is part of the medium term focus referenced above and is central to the Council's plans to increase local regeneration and prosperity.

5.2 Legal implications

The proposals in this report are designed to meet the Council's statutory obligations in relation to setting a balanced 2018/19 budget by mid-March 2018. This includes the duty to report to the Council on the robustness of the estimates provided and the adequacy of the financial reserves in place. Section 31A of the Local Government Finance Act 1992 and Section 25 of the Local Government Act 2003 refer.

6. Other implications

6.1 How will this contribute to achievement of the Council's Plan?

The Council, in common with all local authorities, will continue to be faced with challenging resource constraints over the coming years, which will inevitably have an increasing impact on front-line services. The budget is developed within the context of the approved Medium

Term Financial Strategy, which in turn rests on the principles set out for the City within the Council Plan. In this way pre budget proposals are aligned to existing policy priorities.

6.2 How is risk being managed?

The inability to deliver a balanced budget is one of the Council's key corporate risks. The proposals within this report are aimed directly at trying to mitigate this risk. The scale and scope of the savings that will be included in the Council's bottom line budget position are such that they represent a significant risk of non-achievement in the future. The savings programme will continue to be monitored robustly to ensure that Strategic Management Board and members are kept up to date with the progress of these reviews.

6.3 What is the impact on the organisation?

The size of the revenue gap to be managed means that the Council will have to change radically to meet the challenges that it faces both in terms of the way it works and the services it provides. The very large savings included in previous Budgets but relating to future years will be met largely from savings in employee budgets. Early Retirement and Voluntary Redundancy decisions continue to be made in order to continue the reductions in employee numbers needed to deliver new and existing savings plans. Reduced employee numbers across the Council plus the need to do things differently will further accentuate the importance of new ways of working and will change the nature of the services provided, and the way the Council works.

6.4 Equalities / EIA

The savings contained in this year's pre-Budget report are all technical in nature and therefore there is no equality impact in relation to these. This position will be reviewed ahead of the final budget proposals being put forward in the new year, and any associated equality analysis will be carried out accordingly.

6.5 Implications for (or impact on) the environment

None

6.6 Implications for partner organisations?

None

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Contributors:				
Lara Knight	Governance Services Co-ordinator	Place Directorate	6/11/17	6/11/17
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Helen Williamson	Lead Accountant	Place Directorate	2/11/17	6/11/17
Names of approvers for submission: (officers and members)				
Drector: Barry Hastie	Director of Finance and Corporate Services	Place Directorate	6/11/17	6/11/17
Legal: Carol Bradford	Corporate Governance Lawyer	Place Directorate	6/11/17	7/11/17
Members: Councillor John Mutton	Cabinet Member (Strategic Finance and Resources)		7/11/17	8/11/17

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www.coventry.gov.uk/councilmeetings

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	Description	Proposal & Implications	2018/19 £000	2019/20 £000	2020/21 £000
	Budget Deficit Brought Forward		0	0	11,419
	<u>Delayed Delivery of Existing Savings</u>				
1	Children's Transformation	The areas indicated all have savings targets that were established in previous Budgets. Plans are in place to deliver some of these savings but shortfalls are anticipated in line with the figures shown here.	4,440	3,129	2,574
2	Transport		500	500	500
3	Business Services Savings		461	203	203
4	Place Directorate		200	200	200
	Total of Delayed Delivery of Existing Savings		5,601	4,032	3,477

	<u>Emerging Budgetary Pressures</u>				
5	Looked After Children Placements	There has been a significant increase in the number of Looked After Children which creates additional cost in the placements budget. Average LAC numbers in 2016/17 were 587, but they are currently running at over 650. This pressure is based on a LAC population of 650, and a strategy to reduce the overall unit cost of LAC placements through placement mix.	1,827	891	0
6	Supported Accommodation	This pressure is based on a projection of future care leaver numbers and future costs of provision following a retendering process. It also assumes that we will reduce the number of high cost placements moving forward.	490	382	275

	Description	Proposal & Implications	2018/19 £000	2019/20 £000	2020/21 £000
7	City Centre Parking	The approved City Centre South retail development will result in the closure of Council owned car parks which currently generate income. Whilst the new development reprovides car parking, the income will go to the operator/developer, giving the Council a financial pressure.	0	0	500

	Description	Proposal & Implications	2018/19 £000	2019/20 £000	2020/21 £000
8	City Centre Rents	The approved City Centre South retail development will result in various Council owned properties being demolished. As we get closer to the expected scheme implementation date, many of these properties cannot be let on a short term basis meaning that rent voids and void property rate liabilities become a pressure to the Council.	500	1,000	2,000
9	Homelessness - Housing Benefit Impact	The amount of housing benefit that can be claimed back from the government for individuals and families placed in emergency accommodation has never been sufficient to cover the cost incurred. Increased homelessness across the city and nationally is resulting in a significantly greater cost both in terms of the net cost of emergency accommodation to the Council, and also the administration impacts across various teams within the Council.	1,500	1,500	1,500
10	Housing Options Team	Additional costs for statutorily homeless relating to temporary accommodation over and above what can be claimed via housing benefit, as well as costs of providing storage.	200	200	200
11	Neighbourhood Teams and Referral & Assessment Service	Financial pressure as a result of supporting homeless families to prevent bringing children into care. This includes families with no recourse to public funds	300	300	300
12	Children's Placements Team	Financial pressure as a result of homeless 18-24 year olds in supported or other temporary accommodation.	100	100	100
13	Woodlands School	Cabinet approval was given in July 2017 to provide resources towards the ongoing costs of keeping the Woodlands Academy school site open for the benefit of community facilities, until such time as the future vision for the site has been established.	150	150	150

	Description	Proposal & Implications	2018/19 £000	2019/20 £000	2020/21 £000
14	Council Tax Exemption For Care Leavers	In March 2017 the Council's Cabinet agreed to exercise its discretionary powers to award a 100 per cent discount for Coventry care leavers between the ages of 18 and 21 residing in the city. This proposal funds the estimated cost of this change.	47	47	47
15	IT Licences	Expected increased costs in IT Licences	250	250	250
16	Coroners West Midlands Police Grant Fall-Out	In July 2014 the Council entered into an agreement with West Midlands Police for the Transfer of the Coroners Service. This included a reducing profile of contributions from West Midlands Police resulting in this budget shortfall from 2018/19.	29	58	58
17	ICT Security	Following a national increase in attempted cyber crime against public sector organisations, increased IT security is required to protect the Council's IT infrastructure.	150	150	150
18	Annual Leave Payments (Contractual Overtime)	A recent legal ruling applicable to all Councils has judged that voluntary overtime should be taken into account when calculating holiday pay. Workers undertaking voluntary overtime over a sufficient period of time on a regular and/or recurring basis are entitled to have these payments included in the first 4 weeks' of their paid holiday. It is anticipated that the ruling will apply on a national basis and the estimated cost of this for Coventry is reflected here.	465	465	465

	Description	Proposal & Implications	2018/19 £000	2019/20 £000	2020/21 £000
19	Contact Centre Staffing	To maintain performance levels within the contact centre this additional resource is required to replace previously one off resources	115	115	115
	Total Emerging Budgetary Pressures		6,123	5,608	6,110
	<u>Technical Savings</u>				
20	Council Tax Collection Fund and Tax-Base	Council Tax income resources that are available as a result of the actual 2016/17 Council Tax surplus and projected 2017/18 surplus in excess of previous figures budgeted. This reflects increases in the city's tax-base above the underlying estimate and includes the effects of growing housing numbers and continuing downward trends in the level of Council Tax Reduction Scheme payments and overall levels of discounts.	(4,900)	(2,000)	0
21	Inflation Contingencies	This assumes that previously planned for amounts for pay awards and pensions auto-enrolment from 1st April 2017 can be scaled back compared with previous medium term estimates.	(2,000)	(2,000)	0

	Description	Proposal & Implications	2018/19 £000	2019/20 £000	2020/21 £000
22	Asset Management Revenue Account	The AMRA revenue saving incorporates a range of impacts including the level of capital financing costs (reflecting the profile of capital spend), the level of income from investing the Council's cash balances, the impact of the Council's new Minimum Revenue Provision (MRP) and the cash-flow implications of the Council's up-front payment of pension contributions..	(2,000)	(2,000)	(2,000)
	Total Technical Savings		(8,900)	(6,000)	(2,000)
	Total Financial Shortfall		2,824	3,640	19,006



Public report Cabinet

Cabinet
Council

28th November 2017
5th December 2017

Name of Cabinet Member:

Cabinet Member for Community Development – Councillor Bigham

Director Approving Submission of the report:

Deputy Chief Executive (Place)

Ward(s) affected:

All

Title:

Adoption of the new Coventry City Council Local Plan and City Centre Area Action Plan

Is this a key decision?

Yes.

The proposals in the report are likely to have an impact on all wards across the city as they relate to the City's new Local Development Plan and City Centre Area Action Plan.

Executive Summary:

Following a period of public examination the Inspector has now issued her final reports in so far as they relate to the city's new Local Plan and City Centre Area Action Plan (AAP). The reports conclude that both Plans are Sound and legally compliant (subject to the inclusion of the identified modifications) meaning the Council can move to adopt both the Local Plan and City Centre AAP subject to those modifications being incorporated into the Plans (all such modifications were approved by Council and consulted upon in March and April 2017).

Once adopted by the Council, the new Local Plan and City Centre AAP will become the basis for determining planning applications from the following day (the 6th December 2017). The legal framework that governs development plans means they will remain subject to a statutory 6 week legal challenge period. This is expected to run between the 6th December 2017 and 17th January 2018. Should any such challenge arise however it would not directly impact upon the material weight afforded to the Plan(s) unless the challenge was successful through the high courts. Should such a challenge arise a further report will be presented to Cabinet and Council to provide a suitable update on the expected process and associated risks etc.

The new Local Plan also provides an on-going blue print for continued joint working with the city's neighbouring authorities in Warwickshire and the wider West Midlands. Both Plans will be monitored on at least an annual basis to ensure they are delivering successfully against their aims and objectives and to assess whether or not they require review either partially or in full.

Recommendations:

The Cabinet is requested to recommend to the Council:

1. That it adopts the Coventry City Council Local Plan 2011-2031 and the City Centre Area Action Plan in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and that together they supersede the policies set out in the Council's 2001 Development Plan as set out in Appendix 6 of the Local Plan Appendices.
2. Note that the adopted Coventry Local Plan and City Centre Area Action Plan 2011-2031 are the Submitted Plans – 1st April 2016 as amended by:
 - a) The inspectors final report (as appropriate) (Appendix 1);
 - b) the schedule of Main Modifications recommended by the Local Plan's Inspector (Appendix 2); and
 - c) the schedule of minor modifications (Appendix 3).
3. Request that Adoption Statements and the final Sustainability Appraisal reports are made available on or as soon as possible after the 6th December 2017 in accordance with regulation 35 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).
4. That authority is delegated to the Head of Planning and Regulatory Services in consultation with the Cabinet Member for Community Development to make further minor modifications to the Plans prior to their final publication, where these modifications are confined to the correction of typographical errors, amendments to policy or paragraph reference numbers, and consequential cross referencing.

The Council is recommended to:

1. Adopt the Coventry City Council Local Plan 2011-2031 and the City Centre Area Action Plan in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and that together they supersede the policies set out in the Council's 2001 Development Plan as set out in Appendix 6 of the Local Plan Appendices.
2. Note that the adopted Coventry Local Plan and City Centre Area Action Plan 2011-2031 are the Submitted Plans – 1st April 2016 as amended by:
 - a) The inspectors final report (as appropriate) (Appendix 1);
 - b) the schedule of Main Modifications recommended by the Inspector (Appendix 2); and
 - c) the schedule of minor modifications (Appendix 3).
3. Request that Adoption Statements and the final Sustainability Appraisal reports are made available on or as soon as possible after the 6th December 2017 in accordance with regulation 35 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).
4. Delegate authority to the Head of Planning and Regulatory Services in consultation with the Cabinet Member for Community Development to make further minor modifications to the Plans prior to their final publication, where these modifications are confined to the correction of typographical errors, amendments to policy or paragraph reference numbers, and consequential cross referencing.

List of Appendices included:

Appendix 1: Inspectors Reports for the Local Plan and City Centre AAP (October 2017)

Appendix 2: Full schedule of Minor and Main Modifications to the Local Plan and City Centre AAP

NB: The full schedule of modifications will be incorporated into the Plans and they will be subject to final design and layout for presentation purposes as part of the publication process. For information purposes however, these are expected to read the same as the tracked change version of the Plans approved at Council on the 14th March 2017 (under agenda item 135) – see link below.

Background papers

None

Other useful documents:

The initial Publication Drafts of the Local Plan and City Centre Area Action Plan were considered at Council on the 12th January 2016. The Coventry and Warwickshire Housing Requirements Memorandum of Understanding was also agreed at the same meeting. All papers are available under agenda items 109, 111 and 112 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=130&MId=10701&Ver=4>

A summary note of all responses received to this period of consultation was provided to Scrutiny Board 3 at its meeting on the 16th March 2016. All papers are available under agenda item 39 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=570&MId=10808&Ver=4>

Full coverage of all consultation responses received during this period are available under reference LP16 via the following link:

http://www.coventry.gov.uk/downloads/download/4070/coventry_local_plan_2016

The Coventry and Warwickshire Employment Land Memorandum of Understanding was considered at Council on the 11th October 2016. All papers are available under agenda item 63 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=130&MId=11139&Ver=4>

The Coventry and Warwickshire review of the 2014 based sub-national population projections and household projections is available via the following link:

http://www.coventry.gov.uk/downloads/file/21921/lp231_cw_2014-based_projections

The proposed modifications to both the draft Local Plan and City Centre AAP were considered at Council on the 14th March 2017. All papers are available under agenda item 135 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=130&MId=11143&Ver=4>

A summary note of all responses received to this period of consultation was provided to Scrutiny Coordination Board at its meeting on the 10th May 2017. All papers are available under agenda item 5 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=151&MId=11365&Ver=4>

Full coverage of all consultation responses received during this period are available under reference MOD20a, MOD20b and MOD21 via the following link:

http://www.coventry.gov.uk/downloads/download/4553/proposed_modification_documents_and_information

Has it been or will it be considered by Scrutiny?

No. However, previous rounds of consultation on the both Plans have been considered through Scrutiny.

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, 5th December 2017

Report title: Adoption of the new Coventry City Council Local Plan and City Centre Area Action Plan

1. Context (or Background)

- 1.1 The Coventry Draft Local Plan and City Centre Area Action Plan (AAP) were submitted to the Secretary of State (SoS) on 1st April 2016. Following its submission, the SoS appointed an independent Inspector – Rebecca Phillips – to oversee the public examination of the Plans and their evidence base. The public examination hearing sessions took place over 3 stages between July 2016 and January 2017. Following this examination process the Inspector identified a need for the Council to consult on proposed modifications to both Plans which in turn responded to the Action Points raised by the Inspector during the hearing sessions. This consultation process ran between the 15th March and 28th April 2017. A summary of the consultation process and the responses received were considered by the Scrutiny Coordination Board on the 10th May before all information was returned to the nominated Inspector on the 12th May 2017. This has been a statutory process undertaken in accordance with the Town and Country Planning (Local Planning) (England) Regulations (2012) and has now resulted in the Inspector issuing her final report. This report concludes that the Plans are both Sound and legally compliant meaning the Council can move to adopt both the Local Plan and City Centre AAP subject to the proposed modifications (approved by Council and consulted upon in March and April 2017) being included.
- 1.2 Once adopted by the Council, the new Local Plan and City Centre AAP will remain subject to a statutory 6 week legal challenge period. This timeframe starts when the statutory notice of adoption is posted on the Council’s website, which will take place the day after the Council meeting on the 5th December 2017 (subject to the relevant endorsement of the recommendations). This will be followed by formal notifications being sent to those parties who have participated in the examination and development of the Local Plan. If adopted by the Council, the new Local Plan and City Centre AAP will become the basis for determining planning applications from the following day (the 6th December 2017).
- 1.3 The legal framework that governs development plans means they will remain subject to a statutory 6 week legal challenge period. This is expected to run between the 6th December 2017 and 17th January 2018. Should any such challenge arise however it would not directly impact upon the material weight afforded to the Plan(s) unless the challenge was successful through the high courts. Should such a challenge arise a further report will be presented to Cabinet and Council to provide a suitable update on the expected process and associated risks etc.
- 1.4 The new Local Plan also provides an on-going blue print for continued joint working with the city’s neighbouring authorities in Warwickshire and the wider West Midlands. Both Plans will be monitored on at least an annual basis to ensure they are delivering successfully against their aims and objectives and to assess whether or not they require review either partially or in full. Such monitoring will track the number of new homes, the amount of new employment floor space and the vibrancy and vitality of our city centre.
- 1.5 For the avoidance of doubt and for clarity, the conclusions drawn by the Inspector in her final report cover the following key points:
- The Plan has been subject to adequate and satisfactory consultation processes in accordance with the Council’s Statement of Community Involvement;

- The City Council have fully complied with the spirit and intentions of the statutory Duty to Cooperate;
- The completion of sub-regional Memorandum of Understanding (MOU's) with its neighbouring authorities in the face of land supply constraints has been very helpful and resulted in effective outcomes;
- The Sustainability Appraisal and other legal requirements of the Plan have been satisfied;
- That the Inspector has given due regard to the population projections and alternative approaches to calculating the city's growth projections and housing needs. She has concluded that the Joint Strategic Housing Market Assessment (SHMA) represents a sound and robust platform from which to develop the Local Plan and that there is no justification for diverting from that assessment;
- That the housing requirements be tested as a minimum and monitored against a stepped trajectory;
- That a robust assessment of suitable sites within Coventry has been carried out through the Strategic Housing Land Availability Assessment (SHLAA) and the Plans;
- That the city can demonstrate a robust 5 year housing land supply;
- That all site specific allocations are necessary to maximise the development options within the city boundary and should therefore be retained;
- That exceptional circumstances exist to release land from the Green Belt to meet development needs;
- That a detailed Masterplan Principles Policy be included to cover larger developments in general as well as key sites at Eastern Green, Keresley and Whitley;
- That the site requirements of Gypsy's and Travellers will be positively planned for through the Local Plan;
- That a specific review mechanism be incorporated into the Plan to ensure it can be regularly tested and reviewed (either in full or in part) should a significant change in circumstances occur. This could include an increase or decrease in housing need;
- That the employment policies are robust and provide adequate opportunities to grow the city's economy and support its key employers;
- That relevant adjustments be made to the retail policies to ensure they are met is brought in line with national guidance, especially around sequential and impact assessment. The approach to the city centre as a focal point in the retail hierarchy is supported though;
- Is supportive in principle of the Green Environment policies around the new Local Green Space designation, tree protection and other high quality green spaces, but that greater clarity be added (in accordance with the modifications) to strengthen the policies;
- Policies governing design and heritage are supported, most notably around the proposed Heritage Park and Loop Line proposals;
- That the transport evidence provided in support of the Plan was robust and appropriate and that the policies provide a solid basis for considering detail transport impacts at planning application stages. Also, that the transport policies provide a blueprint for helping increase active modes of transport and facilitate new infrastructure.
- That environmental management policies be updated and enhanced to reflect the most recent advice from the Environment Agency and to cover matters of ground stability and mining legacy;
- That the 'live' Infrastructure Delivery Plan and Monitoring Frameworks be updated to reflect the most up to date position of infrastructure and the amended policies (where appropriate).

2. Options considered and recommended proposal

- 2.1 At this stage of Plan preparation only two potential options have been considered.
- 2.2 The first of these options is set out in the recommendations to this report. This would see both Plans adopted and become the new development framework for determining planning applications across Coventry.
- 2.3 The second option would be to not adopt the Plans and withdraw them from the examination process and start work on new Plans. This option is not recommended as it would mean the Council being without an up to date Development Plan for at least another 3 years and incur further significant costs in preparation and examination time. Being without a Development Plan for this time period would significantly increase the risk of planning by appeal, having little or no control over planning within the city's own administrative boundaries. Indeed, central Government have indicated that they may step in and produce Plans themselves on behalf of Local Authorities who do not have an up to date Plan in place by the end 2017. Furthermore, and having regard to the work undertaken with neighbouring authorities in the preparation of the current draft Development Plan to date, this option would also raise significant risks and concerns over the Duty to Cooperate process. It is also important to note that now the Inspector's reports have been issued they become a material planning consideration in their own right. They would therefore need to be given due consideration when determining planning applications where relevant.

3. Results of consultation undertaken

- 3.1 Numerous periods of public consultation have taken place since 2004 that have related to the development of the Local Plan (or the Core Strategy as it was previously known). The results of this consultation have been reported to Council and Scrutiny panels at various times in the last ten years. Likewise, the City Centre AAP has been subject to previous rounds of consultation dating back to 2010 with results of such consultation reported accordingly.
- 3.2 This process culminated in the statutory period of public consultation between January and February 2016 which focused on the proposed Local Plan and the City Centre AAP. A full Equalities and Consultation Assessment was undertaken at this time to support this consultation. With regards the draft Local Plan approximately 740 responses were received from local communities, local business, professional organisations and key stakeholders, with additional views and opinions expressed and recorded at Ward Forums and drop in sessions. This showed that the greatest area of objection was around potential development within the city's Green Belt, most notably at Keresley, Eastern Green, Cromwell Lane and Baginton Fields. With regards the City Centre AAP approximately 400 responses were received from local communities, local business, professional organisations and key stakeholders, with additional views and opinions expressed and recorded at Ward Forums and drop in sessions. This showed that the greatest area of concern was around the growth of Coventry University, however there was also significant levels of support for regenerating the city centre.
- 3.3 The responses received during this period were presented to a special meeting of Scrutiny Board 3 and Planning Committee in March 2016.
- 3.4 Further statutory consultation was undertaken in early 2017 relating to the proposed modifications to both plans. Approximately 230 responses were received with the vast majority relating to the Local Plan and objecting to matters of proposed Green Belt development and the level of growth proposed for the city. This round of consultation

utilised a very similar consultation strategy that was used in early 2016. A summary of all responses received were presented to the Council's Scrutiny Coordination Board on the 10th May 2017.

4. Timetable for implementing this decision

- 4.1 Should Council approve the recommendations set out in this report the decision will take effect from the following day (6th December 2017). The Council will issue the Adoption notice and other supporting documents on its website and make them available in the relevant and necessary council offices and local libraries. The new Local Plan and City Centre AAP will then form the statutory basis for determining planning applications across Coventry.

5. Comments from the Director of Finance and Corporate Services

5.1 Financial implications

The primary costs associated with the new Plans include the publication of the documents for use by officers, Councillors and other stakeholders. These are considered to be minimal and will be funded from existing budget provisions.

The preparation of both Plans to date however, has incurred significant costs through the development and examination process. Whilst the cost of developing the Plans has already been incurred and funded in prior years, the cost of the examination process is additional and will be incurred in the current financial year, 2017/18. Resources have however been previously earmarked within Council Reserves and are expected to be sufficient to meet the anticipated costs.

5.2 Legal implications

The development of both Plans and their subsequent adoption reflects the statutory requirements set out in the Planning and Compulsory Purchase Act 2004, the Localism Act 2011, the Town and Country Planning Act 1990 and other associated regulations, the National Planning Policy Framework (2012), and Planning Practice Guidance (2014).

The recommended adoption of the Plans means both Plans have been deemed to be sound and legally compliant in accordance with national legislation and guidance. This includes the satisfactory discharging of the Council's responsibilities under the Duty to Cooperate as set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as introduced by the Localism Act 2011).

The provisions of the Planning & Compulsory Purchase Act 2004 and Localism Act 2011 set out the relevant provisions governing the matters raised in this report, including that the Council has a duty to have a development plan.

If the recommendations are approved by Council, an adoption statement and the final sustainability appraisal report are required to be issued alongside the finalised Plans at the earliest convenience in accordance with regulations 17 and 26 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended). This statement is published on the Council's website and sent to all interested parties as well as the secretary of State for their information.

The statutory legal challenge period is set out in Section 113 of the Planning and Compulsory Purchase Act 2004. Challenges should focus on the legal process and correctness of the Plan as opposed to matters of soundness. Challenges should be made

promptly and directed to the High Court. Should the Plan be subject to legal challenge a further report will be brought before Council to outline the proposed timescale and process.

Once adopted by the Council, the Local Plan and the City Centre AAP will become the starting point for determining any planning applications that are submitted to the Council for consideration. Accordingly, the adoption of the Local Plan and the City Centre AAP as proposed in this report will ensure that future planning decisions and appeals can be robustly defended.

6. Other implications

6.1 How will this contribute to achievement of the Council's Plan?

- A prosperous Coventry: The plans have sought to deliver a range of opportunities to deliver new homes and employment land across the city for the next 15-20 years. This will help to ensure that sufficient new homes are provided to meet the needs of local people and sufficient jobs are created and facilitated. It will also help ensure that businesses are not deprived of staff through a lack of housing and land opportunities;
- Citizens living longer, healthier, independent lives: Choosing the right approach to delivering the city's housing, employment, retail and infrastructure needs will help promote improvements to the existing built environment. The most valuable and sensitive green spaces will also be protected from inappropriate development. Both Plans also contain specific policy promoting improvements to health and wellbeing including improvements to health inequalities and life expectancy.
- Making Coventry an attractive and enjoyable place to be: Choosing the right approach to delivering the city's housing, employment, retail and infrastructure needs will help promote improvements to the existing built environment. This will also create opportunities for the city centre to develop and regenerate supporting increased tourism and ensuring the most valuable and sensitive green spaces will also be protected from inappropriate development.
- Providing a good choice of housing: In partnership with neighbouring authorities both Plans make provisions to fully meet the city's housing needs. This will ensure that sufficient new homes are provided to meet the needs of local people within the Housing Market Area.
- Making places and services easily accessible: New homes and job opportunities will be brought forward in a planned and sustainable way. In practical terms this will help ensure the right amount of new development happens to ensure that services are viable and accessible. Both Plans will also promote sustainable development with adequate provision of infrastructure and improved accessibility to key services and facilities.
- Encouraging a creative, active and vibrant city: Both Plans promote a centres first policy, establishing designated centres as the hub for new retail, leisure and community investments within their surrounding communities. New homes and job opportunities will be brought forward in a planned and sustainable way. In practical terms this will help ensure the right amount of new development happens to ensure that services are viable and accessible.
- Developing a more equal city with cohesive communities and neighbourhoods: By planning proactively for the city's housing and employment needs both Plans can help to ensure that more people will be adequately housed, with greater access to new jobs, leisure provisions and community facilities.
- Improving the environment and tackling climate change: The Plans proactively seek to mitigate the impacts on the environment brought about by development and include specific policy on combating climate change. The Plans will help bring about

improvements to areas in need of investment and will protect the most valuable and sensitive areas of green space from inappropriate development.

6.2 How is risk being managed?

The primary area of risk now sits with the statutory legal challenge period. This remains open for a 6 week period and will run between the 6th December 2017 and 17th January 2018.

Throughout the development of the Local Plan and City Centre AAP however, we have sought to undertake extensive engagement, consider all reasonable alternatives and promote the most deliverable and sustainable opportunities for the growth and evolution of the City. This work has been undertaken over many years and has been with a view to minimising the risk of legal challenge and the failure of the Plan. The Council's approach has been endorsed by the Inspector through her reports.

6.3 What is the impact on the organisation?

No direct impact.

6.4 Equalities / EIA

A full Equality and Consultation Assessment (ECA) was undertaken as part of the initial Local Plan and City Centre AAP engagement processes. These were updated to reflect the statutory consultation period in January 2016 and formed part of the Council's submission to the Secretary of State. This stage of the process will result in the adoption of the Local Plan and City Centre AAP with no further changes or impacts on the aims, objectives and direction, therefore a further update of the ECA has not been deemed appropriate at this stage. As part of developing its ECA considerations the Council has had due regard to its public sector equality duty under section 149 of the Equality Act 2010.

In summary, there will be significant economic and social benefits to the city through the development of new homes and employment opportunities in Coventry. This will be promoted by urban regeneration and the redevelopment of land currently sitting vacant and derelict as well as increased opportunities for job creation and the delivery of new infrastructure.

6.5 Implications for (or impact on) the environment

A detailed assessment of potential environmental implications and issues has been undertaken as part of the Sustainability Appraisal Report (SA/SEA) for both the draft Local Plan and the City Centre AAP. These reports have been consistently available as part of all periods of engagement and consultation.

In summary this highlights potential increases in carbon emissions and air quality issues generated by new developments and an increased population. There are also accepted environmental impacts brought about by the proposed development of Green Belt land, however the provision of new green and blue infrastructure as part of such development is likely to support increased biodiversity and quality of space. The plan also encourages climate change adaptation and the provisions of renewable energy and energy efficient buildings. The proposed modifications to both Plans also strengthen the policy platform around air quality, drainage and flood risk in accordance with the latest Environment Agency advice.

6.6 Implications for partner organisations?

As part of developing both Plans, the city council has worked extensively with its Warwickshire neighbours and the CW LEP (amongst others) to agree memorandum of understanding and plan positively for the delivery of new homes and employment land across the sub-region. This has been particularly important to Coventry due to the constrained nature of its administrative boundaries and developable land supply. The adoption of both Plans will mean the City Council must continue to work in partnership with its neighbours to monitor the delivery of new homes and employment land across the sub-region and continue to plan positively for, and deliver, new infrastructure that will support sustainable growth.

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Report to Coventry City Council

by Rebecca Phillips BA(Hons) MSc DipM MRTPI MCIM

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 13 October 2017

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Coventry Local Plan 2011 - 2031

The Plan was submitted for examination on 1 April 2016

The examination hearings were held between July, October and November 2016 and January 2017

File Ref: PINS/U4610/429/6

Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
DCLG	Department for Communities and Local Government
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Coventry Local Plan provides an appropriate basis for the planning of the City provided that a number of main modifications (MMs) are made to it. Coventry City Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- To ensure that the levels of housing, employment, office and retail development to be provided over the Plan period are accurately identified and that the means to deliver the required development is clear;
- To ensure that the delivery housing trajectory is up-to-date and that the basis of the calculation of the 5 year housing land supply position is set out clearly;
- To ensure that there are adequate arrangements to secure the provision of housing and employment elsewhere in the West Midlands HMA to meet the shortfall of provision in Coventry;
- To provide new policies for each of the strategic sites to include infrastructure requirements and master planning principles;
- To provide sites to meet the identified needs of Gypsy and Travellers;
- To identify accurately the necessary transport and other infrastructure improvements; and the mechanisms for securing developer contributions towards them;
- To provide more clarity on the timing and phasing of infrastructure for the strategic sites by including categories of infrastructure in the policies and more detail in the Infrastructure Delivery Plan;
- To ensure that the retail requirements are set out accurately and that the position of defined centres in the hierarchy are consistent with the evidence;
- To ensure that the Plan's development management and site allocation policies are justified, effective and consistent with national policy;
- To ensure that there are effective policies to deal with flood risk, drainage, minerals and waste;
- To ensure that there are effective policies to protect the historic environment, Green Belt, open space and local green spaces;
- To ensure that the Plan's policy requirements take adequate account of viability considerations;
- To ensure that the policies provide a sound monitoring framework for the Plan.

Introduction

1. This report contains my assessment of the Coventry Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Coventry Local Plan 2011 - 2031 submitted in April 2016 is the basis for my examination. It is the same document as was published for consultation in September 2014.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc. and are set out in full in the Appendix (referred to as MOD1, MOD2 etc.).
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Local Plan publication draft 2016 – Policies map as set out in LP6.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. There are also a number of cartographical errors to correct. These further changes to the policies map were published for consultation alongside the MMs¹.
7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted

¹ Examination Document MOD.3

policies map to include all the changes proposed in examination document MOD.3 and the further changes published alongside the MMs.

Consultation

8. The Council carried out widespread public consultation over a six-week period, both on the Plan before its submission and on the proposed main modifications. I have taken account of all the responses to those consultations in preparing this report. The Council contacted everyone on their extensive consultation database. Notices were also placed in local newspapers, local libraries and community venues and on the Council's website. Officers held open evenings and exhibitions and attended Parish Council meetings and other local meetings on request.
9. A very large number of representations were received at both stages of consultation, from local residents and businesses, community organisations, neighbouring local authorities, statutory agencies, developers and others. In my view, the consultation process gave all those potentially affected by the Plan an adequate opportunity to express their views.
10. It was asserted that certain evidence documents, including some of the reports on the transport modelling of the Green Belt allocations, were not made publicly available in time to inform pre-submission consultation on the Plan. However, all the relevant documents were made available to participants at the hearing sessions, including residents and representatives of community groups, and were the subject of thorough comment and discussion. It is most unlikely that any additional points would have been made, had the documents been available sooner. I am satisfied therefore that consultation on the Plan was not compromised by a lack of information.
11. Taking all these points into account, I find that satisfactory consultation was carried out on the Plan. The consultations met all the relevant legal requirements, including compliance with the Council's *Statement of Community Involvement*².

Assessment of Duty to Co-operate

12. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
13. The Council's Duty to Co-operate Topic Paper³ describes the joint working and activities it has undertaken with other bodies. This includes co-operating with the other 5 local authorities in the Housing Market Area (HMA), namely Warwickshire County Council (WCC), Nuneaton and Bedworth Borough Council (NBBC), North Warwickshire Borough Council (NWBC), Rugby Borough Council (RBC), Warwick District Council (WDC) and Stratford-on-Avon District Council (SDC). This is evidenced most notably by the joint working in respect of meeting housing needs. The Coventry and Warwickshire joint Strategic Housing Market Assessment (SHMA) has been endorsed by each of the local authorities.

² Statement of Community Involvement (July 2012) Examination Document LP15

³ Duty to Cooperate Topic Paper (March 2016) Examination Document LP23

14. A Memorandum of Understanding (MoU)⁴ on the level and distribution of housing across the HMA has also been signed by each of the local authorities apart from NBBC. This Council has committed to reviewing the extent of its land availability as part of an updated Strategic Housing Land Availability Assessment (SHLAA) and may sign the agreement at a later date. The MoU sets out the Objectively Assessed Need (OAN) for housing for each local authority within the HMA. The local authorities accept that Coventry City Council is unable to accommodate its full housing need within its own administrative boundary. As such, the MoU sets out the agreed distribution of the shortfall within Coventry to the other local authorities in the HMA. Each local authority signed up to the agreement is committed to ongoing co-operation and engagement in relation to the delivery of housing for the HMA. The MoU and joint SHLAA have been an important component of the assessment of the capacity of the City to accommodate new housing.
15. An agreed statement⁵ between Coventry City Council and NBBC was submitted to the examination. It acknowledges that whilst NBBC has not signed the MoU this does not signify a refusal to sign permanently but rather reflects that NBBC first seek to assess their housing land capacity. This would be undertaken as part of the process of updating their development plan and would allow the testing of meeting the unmet need from Coventry through evidence which would also be supported by Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and public consultation. If this process demonstrated that the level of additional housing identified for delivery in NBBC cannot be met, then both parties would work jointly with the other Warwickshire authorities to review the MoU as appropriate. They both stressed an on-going commitment to working together and with neighbouring authorities to meet the development needs of the sub-region.
16. I deal below with the soundness issues in relation to identifying and meeting housing needs across the HMA. However, in terms of the duty to co-operate there is no specific requirement to have reached agreement on the distribution of housing provision across the HMA at the time of submission. It is the actions of the Council in working with other relevant authorities which is central to my consideration of the matter. The Council has participated in joint working in respect of the evidence base for assessing housing needs – both in the context of the SHMA involving all Warwickshire Councils and the updated evidence base. The Council has demonstrated a history of constructive and effective co-operation and joint working with other authorities in the HMA in relation to strategic housing and employment matters. Coordination has also taken place with the other local authorities in a wide range of matters that are described in more detail in the above-noted background paper.
17. There has been ongoing cooperation with other statutory bodies most notably Highways England, the West Midlands Integrated Transport Authority and the Environment Agency, the last named of which has resulted in the preparation of a statement of common ground in respect of the Coventry LP examination. Coventry is a member of the Coventry and Warwickshire Local Enterprise Partnership (CWLEP). The CWLEP area coincides with the HMA. It led the sub-

⁴ MOU relating to the planned distribution of housing: Examination Document LP10

⁵ LP176

regional assessment of employment land availability and was active in identifying and assessing the availability of major employment sites within the sub-region. The outputs of this work have informed the Local Plan.

18. Taking these matters together and within the specific context which applies in this case, I am satisfied that the Council engaged constructively, actively and on an on-going basis in terms of overall housing provision and other strategic matters. I conclude therefore that the Council has complied with the duty to co-operate.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 10 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Does the Local Plan appropriately identify housing needs and does it set out effective measures to meet them in accordance with national planning policy?

Objective Assessment of Housing Needs

20. The National Planning Policy Framework (NPPF) says that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the NPPF's policies.⁶ The first step in the process is to identify the full, objectively assessed housing needs.
21. The joint Coventry and Warwickshire (C&W) SHMA was produced on behalf of the Council and its neighbouring authorities in 2013⁷. This was subsequently updated in 2014⁸ and 2015⁹. The C&W joint SHMA identified the Coventry and Warwickshire area as an appropriate housing market area (HMA). The HMA is justified in the C&W joint SHMA report and supported by a national research study by the Centre for Urban and Regional Development Studies which includes parts of all of the Warwickshire authorities as within a Coventry-focussed HMA. Furthermore it is consistent with evidence underpinning the definition of the CWLEP.
22. The starting point for the assessment of housing need was based on the Department of Communities and Local Government (DCLG) household projections, in line with the Planning Practice Guidance (PPG). In 2013 these were based on the 2011-based 'interim' household projections and predicted an annual increase in households of 4,066 per annum across the HMA. The C&W joint SHMA was updated in 2014 to take account of the Sub National Population Projections (SNPP) published that year and to consider the potential

⁶ National Planning Policy Framework paragraph 47

⁷ C&W Joint SHMA 2013 (LP43)

⁸ C&W Joint SHMA 2014 Annex (LP44)

⁹ C&W Joint SHMA 2015 Update (LP45)

implications of different levels of employment growth on the level and distribution of housing provision in the HMA. In 2015 the C&W joint SHMA was updated to take account of the 2012-based DCLG household projections.

23. Each assessment of need has consistently taken account of demographic need, economic projections, market signals (including affordability) and household formulation rates and has been the subject of sensitivity analysis. Taking into account adjustments made to support economic growth and to improve affordability, the C&W joint SHMA 2015 Update identifies a full objectively assessed need (OAN) for housing in Coventry and Warwickshire of 85,440 homes over the Local Plan period of 2011 – 2031 (4,272 homes per annum). At the local authority level Coventry's full OAN over the Plan period is identified as 42,400 or 2,120 homes per annum.
24. Upon commencement of the first Hearings of the examination, the 2014-based ONS SNPP and DCLG 2014-based household projections were published. The PPG¹⁰ makes clear that housing assessments are not automatically rendered out of date every time new projections are issued. Nonetheless, the Council considered this latest available information to ensure that the local needs assessments were informed by the latest available information. The assessment¹¹ did not seek to revise the key assumptions in the C&W joint SHMA update 2015 but provided an update where the updated population and household projections potentially changed that part of the evidence base. It also considered the 2015 mid-year estimate (MYE) which was also published since the updated SHMA.
25. The findings identify an overall increase of the population of the HMA by 152,319 people over the plan period, representing an 18% increase. There is a predicted increase of approximately 18,800 people in Coventry but lower projected figures across the Warwickshire neighbouring authorities. Overall, the projected level of population growth across the HMA aligns with typical past trends when assessed over a range of trend periods, which reflects the findings of the C&W joint SHMA 2015 Update. The pattern of population growth is similar to that of the 2012-based SNPP. Whilst the projected level of international migration is higher overall, the components of population change differ across different parts of the HMA.
26. The sensitivity testing, which included a number of population projection scenarios, was based on the most up-to-date population data (the 2014-based SNPP and 2015 MYE). It also considered the likely level of population growth required to meet economic forecasts. Market signals and affordable housing were not reassessed in this latest study but I agree that the conclusions from the C&W joint SHMA 2015 Update are unlikely to have changed since September 2015. I return to this below.
27. The updated assessment identifies a very similar level of housing need across the HMA (4,237 homes per annum compared with 4,272 homes previously). Whilst there are differences for individual areas, the updated analysis does not point to any fundamental differences from the conclusions of the 2015 Update. When the more recently published data is taken into account, it is

¹⁰ Planning Practice Guidance (PPG) paragraph 016 Reference ID: 2a-016-20150227

¹¹ Coventry-Warwickshire HMA: 2014-based Subnational Population and Household Projections (August 2016) (LP231)

clear that the identified level of need across the HMA remains valid. Modifications (**MM18**, **MM19** and **MM47**) set this out clearly and are necessary to ensure that the Plan is justified and effective.

28. Alternative OAN calculations were submitted by representors¹² - suggesting that the OAN has been underestimated. Figures vary, with suggestions that the OAN should equate to around 5,000 dwellings per annum or higher to take account of demographic adjustments, household formation rates, market signals and economic growth.
29. The Council's assessment of overall housing need began by considering the most recent (2012-based) population and household projections published by ONS/DCLG in line with national planning policy guidance¹³. It then assessed key components within those projections - namely, migration trends and household formation rates. The 2015 Update also considered the 2013 and 2014 ONS mid-year population estimates. In terms of overall population growth, the analysis shows that the population growth rate in the HMA since 2000 has been broadly similar to that seen across England. The components of population change in Coventry, including migration trends have been taken into account and the analysis does not identify any conclusive evidence that would warrant making adjustments to the demographic projections. The data suggests that future growth is expected to be at a rate reflecting somewhere between short and long-term past trends.
30. Unattributable Population Change [UPC] is the term used by ONS for an unexplained difference between the MYEs that have been updated to take account of the 2011 Census, and the previous "rolled-forward" MYEs that predated the 2011 Census. For the 2011 MYEs, at the national level, UPC amounts to 103,700 - a small proportion of the total UK population. At the local level, however, UPC is distributed very unevenly with some local planning authorities experiencing "positive" and others "negative" UPC. The UPC figure for the HMA is "negative", which suggests that the components of change feeding into the SNP may have over-estimated migration and population growth or there was an error in the Census data.
31. The UPC is relatively modest when considered at the HMA level but has greater impact when considered for individual authorities, particularly Coventry. The Council thus undertook a sensitivity analysis to consider the potential impact of UPC on the projections. However, as set out in the 2015 Update, it is unclear if UPC is related to migration and could potentially be due to changes in the methods used by ONS to measure migration. As such, it is likely that any errors would be focussed on earlier periods and so a UPC adjustment for more recent data would not be appropriate. It is thus not a robust alternative to the SNPP which shows a level of population growth for the HMA which is consistent with short-term past trends. This suggests that UPC is not having a significant impact on the future projections.
32. The 2015 Update considered longer-term 10 year migration trends as part of the sensitivity testing, as an alternative to the 5-year period used in the SNPP. The sensitivity testing showed a higher level of population growth in the HMA and Coventry in particular. At HMA level the analysis showed that

¹² Barton Willmore OAN Review Rep No 1049 dated 29 February 2016 (LP139)

¹³ Planning Practice Guidance Paragraph 015: Reference ID: 2a-015-20140306

population growth could vary from 14% (if UPC was attributed) to around 22% based on a linear projection of 10 year population trends. The 2012-based SNPP lies within the middle of this range at around 17%. The evidence thus tends to support the robustness of the SNPP. Moreover, projections linked to long-term migration trends are not considered to be a reliable alternative to the SNPP.

33. The 10 year linear migration projection shows that the analysis does not take account of the impact of a changing population structure (as the SNPP does). The variable projection is more robust at HMA level but at local planning authority level it is less so, as there are likely factors in the past which have influenced the distribution of growth across the HMA. The sensitivity testing broadly confirms the levels of population growth in the SNPP as a reasonable trend-based projection. It is therefore reasonable to assume that the 2012-based SNPP is a sound basis for identifying housing need. The 2012-based DCLG Household Projections have also been considered in some detail. These appear to be robust when considering age specific household formation rates.
34. In terms of economic growth, the C&W joint SHMA 2015 Update considers the latest economic forecasts from Experian and Cambridge Econometrics. These projections have been compared with historical employment growth. There was also detailed consideration of economic growth assumptions within individual authority employment land reviews.
35. The 2015 Update sets out how there can be issues with the data that each forecasting body uses – for example, jobs can be recorded from places where employees are paid from rather than where the job is located . The comparison between the two 2013 forecasts shows a particular difference between the employment growth expected to occur between 2011-13. It is difficult to provide accurate figures over this period given issues regarding how employment is recorded and the multiple data sources which need to be considered to model employment changes. The Council's evidence thus sought to consider changes across the HMA during this timeframe based on a range of data sources.
36. As explained in the 2015 Update, accurate data for changes between 2011 and 2014 is not essential for the purposes of assessing housing need as demographic data is available up to 2014 and projections were run from 2014 onwards. Consideration was also given to local economic growth dynamics and potential, the influence of past supply/constraints on past performance and the potential influence of policy on future growth potential. Furthermore, in the most recent update, the number of dwellings has been increased to support economic growth. However, these do not impact upon the HMA-wide housing requirement as the overall need linked to economic growth is lower than the demographic need.
37. Economic growth can thus be supported through altering the spatial distribution of housing provision between the neighbouring authorities, in line with the advice in the PPG¹⁴. I consider the Council's assessment to be robust in terms of providing a demand-based assessment of economic growth

¹⁴ Planning Practice Guidance Paragraph 018 Reference ID: 2a-018-20140306

potential for the HMA and individual authorities that takes account of the structure and growth potential of the economy in different areas.

38. Market signals were considered in the 2013 SHMA and revisited in the 2015 Update. House prices, affordability and overcrowding were all taken into account. The 2013 SHMA found that market conditions have changed dramatically since 2007/8 with falling prices and improving affordability. An update to the assessment showed an improvement in market conditions over 2013/14 and associated increases in house prices. However, the SHMA identified that whilst house prices grew over the pre-recession decade, since 2007 in real terms the value of housing has fallen in all areas. Coventry is shown as the most affordable area within the HMA with an affordability ratio of 4.7 which is below national averages. House prices have fallen in real terms since 2008 and this has had a particular impact in Coventry which shows notable improvements in affordability since then.
39. Nonetheless, in the 2015 Update it was acknowledged that there had been a decline in household formation amongst the population aged 25-34. The reduction in the affordability of market housing and the economic recession over the latter part of the 2001-11 decade is likely to have contributed to a decline in household formation rates in younger people. However, the 2015 Update shows an improvement in the projected household formation rates of this age range when comparing the DCLG 2012-based projections to the 2011-based projections¹⁵. As outlined in the evidence, complex factors are at play such as real growth in disposable income, access to mortgage finance, interest rates and economic confidence which will all influence trends in household formation.
40. A scenario was thus developed whereby the headship rates for this age group were returned to levels in 2001. The same approach was taken in the recent analysis. The sensitivity analysis undertaken in 2015 indicated that an uplift of around 75 homes per annum across the HMA would support an improvement in affordability and household formation rates amongst younger households. Using the 2014-based SNPP and MYE projections, the latest update indicates that an uplift of 70 dwellings per annum is required across the HMA. I return to this below.
41. The 2013 joint SHMA identifies a high level of overcrowding in Coventry which is a reflection of the City's housing offer which is focussed more on terraced housing and flats as well as the high number of students. The Council thus seeks to combat this through delivery of a greater number of larger family homes and purpose built student accommodation through the provisions of the Plan.
42. It was suggested that the result of the EU Referendum and plans for Brexit will affect international migration to the UK and result in a reduced level of housing to be required over the Plan period. Also, that the ONS methodology for measuring migration is unreliable. However, the potential impact of Brexit on migration and future population projections is as yet unknown. National planning policy¹⁶ is clear that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about

¹⁵ C&W Joint SHMA 2015 Update (LP45) Appendix A: Figure 1

¹⁶ NPPF paragraph 158

the economic, social and environmental characteristics and prospects of the area and that they should take full account of relevant market and economic signals. The Plan's housing requirement has been identified on the basis of the most up-to-date evidence and has been informed by the latest available information in line with planning policy guidance¹⁷.

43. It has been suggested that the level of housing need in Coventry has been over-estimated on account of inaccuracies in recording the number of students arriving and leaving the City. The Council looked specifically at whether student growth could have inflated the ONS 2012-based SNPP and household projections and whether out migration could have been underestimated. The evidence¹⁸ suggests that student numbers have been growing in Coventry with a notable increase in foreign students over the last 10 years. However, whilst some of the flow of international migrants to the City has been to study, the evidence shows that this does not have a particular impact on overall flows and that numbers of economic migrants are likely to be higher. Whilst there is a strong level of international migration of young persons, the highest inflows are of those aged 20-24 rather than 18-19 year olds. There is significant internal out migration from Coventry of those aged between 20-35 but particularly those aged 20-22. This suggests that some students who come to Coventry to study from abroad then move to other parts of the UK.
44. There is no clear evidence of an under-recording of out-migration of international students. The assessment acknowledges that it is difficult to definitively say whether the various data feeding into the SNPP serves to over or under-estimate international out migration. However, the evidence shows that international students are not a particularly substantial component of overall international migration to the City whilst the age-specific evidence of internal out migration suggests students move to Coventry but subsequently move elsewhere within the UK. Overall, predicted future population growth in Coventry does not look to be erroneous when compared to past trends. As outlined previously it sits somewhere between short and longer term trends.
45. Overall, the updated analysis of more up-to-date information shows that there is a very similar level of housing need across the HMA, i.e. 4,237 per annum compared to 4,272 previously. On the basis of the evidence and taking account of more recent published data, I consider that there are no overriding fundamental differences from the analysis and conclusions set out in the 2015 Update. This supports the robustness of the objectively assessed identified level of need set out in the Plan.

Assessing Affordable Housing Need

46. Coventry's full OAN over the Plan period is identified as 42,400 dwellings or 2,120 homes per annum. Of this total, there is a need for 12,000 affordable homes over the Plan period (equating to 600 per annum). Whilst the full OAN is unlikely to be met within Coventry's boundary, the Plan will seek to meet the identified need for market and affordable housing in partnership with the other HMA authorities. As such, the Council is taking a pro-rata approach to the delivery of affordable homes in terms of what can be delivered within the

¹⁷ PPG Paragraph 015 Reference ID: 2a-015-20140306 & 016 Reference ID: 2a-016-20150227

¹⁸ Note: Students & Housing Need in Coventry (September 2015) LP47

City. The Plan includes a requirement for 24,600 homes which equates to 58% of the OAN and a requirement for 6,960 affordable homes (348 per annum) which also equates to around 58% of the total need.

47. The PPG advises that total affordable housing need should be considered in the context of its likely delivery by market-led housing development. An increase in the Local Plan's total housing requirement should be considered where it could help to meet the need for affordable housing¹⁹. This is considered below under the section headed *Meeting Affordable Housing Need*.
48. In considering the balance between the affordable housing requirement and the supply, the assessment looked at whether levels of housing provision should be adjusted to improve affordability over the longer term. It was found that the deterioration in affordability of market housing over 2001 to 2011 is likely to have influenced a decline in household formation rates in younger people.
49. The link between the affordable housing need and the overall need for housing is complex. The affordable housing needs model includes needs arising from households who require a different size or tenure of accommodation, but whom by moving would not result in a net need for additional housing as they would release an existing property. Additional needs could arise only from concealed or homeless households. The impact of addressing those needs would be to increase household formation rates, particularly amongst younger households. The 2012-based Household Projections already assume increased household formation amongst younger households – and thus “build in” some improvements to affordability.
50. A sensitivity analysis was undertaken exploring a scenario whereby affordability and access to housing for younger households improves. As outlined previously, the analysis sought to quantify the implications of returning the household formation rates of the 25-34 age group back to 2001 levels (before the rate began to decrease) by 2031. Whilst there are complex factors at play and it is difficult to predict how these might influence household formation rates amongst younger households, as outlined above, the sensitivity analysis indicates that an uplift of around 75 homes per annum across the HMA would support an improvement in affordability and household formation rates. This level of uplift would be modest but would not be expected to generate any significant growth as it would be specifically targeted at improving household formation rates of 25-34 year olds within the existing population who may otherwise be living with parents or in temporary or shared accommodation.
51. The more up-to-date information indicates that an uplift of 70 dwellings per annum (or 2%) is required across the HMA. The 2014-based Household Projections already build in some improvements to the household formation rates of the 25-34 population in some areas and hence the 2% is an increase from an already uplifted position and thus results in an overall uplift of 4%. This uplift has been included within the Plan's affordable housing requirement.

Meeting the Objectively Assessed Housing Needs

¹⁹ PPG, 2a-029-20140306

Meeting the Overall Need for Housing – Capacity within Coventry

52. The Plan seeks to provide at least 24,600 new homes over the Plan period. The Council acknowledges that the Plan will not, on its own, deliver the full OAN for market and affordable housing in Coventry. In seeking to meet the OAN for housing, the Council's 'Strategic Housing Land Availability Assessment' (SHLAA), based on data for 2014/15 and published in January 2016²⁰, identifies capacity for around 25,000 homes. Subsequent to this, the Council has updated the figures to present the latest position as of 1 April 2016. This is shown in **MM46** and **MM48** and brings the total housing land supply to around 25,372 dwellings. This is comprised as follows - adding completions since 2011 (5,550) to sites with planning permission (5,900) and sites under construction (945) gives a total of 12,395 homes. Added to this, the SHLAA identifies sites capable of accommodating 3,058 dwellings.
53. The SHLAA used the joint methodology that was prepared by the 6 neighbouring authorities comprising the HMA. The process involved a robust assessment of 503 sites which were analysed for their suitability and deliverability. Some of these sites were discounted and some were incorporated into LP and City Centre Area Action Plan site allocations. The remaining 113 sites have been identified as deliverable or developable residential or mixed use opportunities. They comprise approximately 67 ha of gross developable land and are anticipated to provide 3,058 dwellings. I am satisfied that the SHLAA methodology is sound, and that the position, as updated, provides an accurate account of the sites that are either deliverable within five years or developable in later years, in accordance with the NPPF.
54. The remaining components of the housing supply comprise LP site allocations (8,920 dwellings), City Centre Area Action Plan allocations (649 dwellings) and a small site windfall allowance of approximately 350 dwellings. The figure is based on sites comprising less than 5 dwellings. It is considered important to consider such a supply given the approach in the SHLAA to maximise supply within Coventry's administrative area and to reflect local circumstances which shows a continued contribution of housing completions on smaller sites of less than 5 dwellings. The calculation of the allowance excludes the development of residential gardens. Overall, I am satisfied that the windfall allowance is based on sound evidence and is realistic and achievable. Thus the figure of just over 25,000 dwellings represents a sound assessment of the overall housing land supply over the period of the Plan.

Meeting the Overall Need for Housing – Addressing the Shortfall

55. The identified housing land supply will clearly not meet the OAN for 42,400 dwellings. As referred to elsewhere in my report, the available evidence, most notably the Council's SHLAA process, indicates that the allocation of additional sites would not be achievable given the City's tight administrative boundaries and lack of developable options during the Plan period. In devising its strategy, the Council considered a range of options as set out in the SA/SEA Final Report²¹ including the impacts of attempting to deliver all of its growth

²⁰ Examination Document LP53

²¹ Sustainability Appraisal/Strategic Environmental Assessment Report (January 2016): Examination Document LP8

within its own administrative boundaries. These options were discussed with the neighbouring HMA authorities.

56. Meeting all of the growth within Coventry would remove the Meriden Gap as far as it relates to Coventry's boundary and erode sensitive landscapes and areas of historic significance as well as potentially leading to a high degree of uncontrolled growth and urban sprawl. There would be significant infrastructure investment implications associated with meeting the total level of growth anticipated – not least to overcome significant constraints associated with flooding and environmental designations such as SSSIs, LNRs and ancient woodlands.
57. Other options to increase the supply of housing were considered via the SHLAA process including identifying additional sites, increasing density on allocated and SHLAA sites and increasing the windfall allowance. Additional sites were discounted for a number of reasons, including those outlined above. The Council's review of density across Coventry since 1991²² has helped to inform density assumptions made in terms of site capacity through the SHLAA process. Increasing density assumptions would reduce the opportunity to diversify the housing stock, particularly increasing the number of larger, family homes which are required. Furthermore, the windfall allowance is based on realistic assumptions about viability and delivery. To place a higher reliance on this source would reduce certainty – particularly in respect of infrastructure planning.
58. Policies DS1 and H1 make provision for 24,600 homes but Policy DS2 and the reasoned justification says that the Council will work with its neighbouring authorities within its HMA to support delivery of the development needs that originate from the City. In the case of Coventry, it is anticipated that the full OAN will be met and positively planned for in partnership with the 5 neighbouring authorities within the HMA. This is set out in the Plan and the Coventry and Warwickshire Housing Requirements MOU²³.
59. The MOU sets out the level and proposed distribution of housing within each local authority area across the HMA. This was based on the SHMA which is supported by a shared evidence base designed to ensure that the anticipated scale of housing growth would be distributed appropriately across the HMA. It is founded on realistic assumptions about the availability, suitability and viability of land to meet that need in accordance with the NPPF²⁴. Some representors have suggested that the agreed level and apportionment of the housing for each of the HMA authorities should be included within the Plan. However, I do not consider it necessary and it would be beyond my remit, in examining this Plan. That would be a matter for the examinations of the plans for those particular areas.
60. The MOU was signed by all authorities apart from NBBC who, at that time, were continuing to review the extent of its land availability with a view to potentially signing it at a later date. It is acknowledged within the MOU that NBBC's review of housing land will determine the need for any subsequent amendment to it. This is clear evidence of effective co-operation between

²² Assessing Density Trends in Coventry (December 2015): Examination document LP50

²³ Examination Document LP10

²⁴ NPPF paragraph 159

LPAs with the aim of meeting the housing needs of Coventry and the HMA as a whole. The housing provision in NBBC and the other HMA authorities will be monitored and any necessary Plan review will be undertaken if the necessary development isn't delivered as anticipated.

61. There is a clear expectation that LPAs will co-operate in allocating land to meet a shortfall in a neighbouring area. Policy DS1 of the LP sets out the full scale of the OAN for housing and makes clear that Coventry must continue to work with neighbouring LPAs through the Duty to Co-operate to ensure that appropriate provision is made elsewhere within the HMA. In respect of the implications for this examination, the MOU includes a figure of 14,060 dwellings to be delivered in NBBC. This figure includes the untested OAN for NBBC plus additional dwellings to help meet Coventry's shortfall. The housing figure in NBBC's draft plan is between 12,370 and 13,374 homes, depending on whether the 1,004 house difference is an allowance for contingency within the supply²⁵.
62. The difference between the NBBC draft plan housing figures and the MOU figure is relatively small when considered in the context of the wider HMA. It may be possible to make up this shortfall if more dwellings were delivered across the HMA as a whole. To this end, Coventry City Council points to sub-regional monitoring which suggests that the supply of housing (over 90,000 homes) is slightly above the identified need in the HMA (88,160 between 2011 and 2031)²⁶. This is based on assumptions at this stage that Plans will be adopted as proposed without further changes to site allocations or capacities. The statement of common ground²⁷ between Coventry CC and NBBC submitted to the examination says that joint work will be ongoing to produce an agreed schedule of amendments to NBBC's draft plan to reflect any additional capacity that may be identified within the Borough. Adoption of Coventry's LP will provide certainty in respect of the scale of the shortfall and the requirement for it to be met elsewhere in the Coventry and Warwickshire HMA.
63. Amendments to Policy DS1 (**MM18**) and its supporting text (**MM20, MM25, MM27** and **MM28**) express the housing requirement for Coventry as a minimum in line with Policy H2 and introduce a mechanism to review the Plan and address any shortfall in the event that the wider housing and employment needs of the HMA are not being met. The Council will monitor housing delivery in the City and in other LPA areas across the HMA to ensure it meets the shortfall. This mechanism would ensure that provision is made for Coventry's needs over the Plan period. Should sufficient housing not be brought forward within Coventry or the wider HMA there is a policy requirement for a full or partial review of the Plan to be undertaken. These proposed modifications are necessary to ensure that the LP is effective.

Meeting the Affordable Housing Need

64. As outlined above, there is an identified need for 12,000 additional affordable homes in Coventry between 2011- 2031. The Council has taken a pro-rata approach to identifying the level of affordable housing it will seek to deliver within its administrative boundary. Coventry's identified capacity figure of

²⁵ Coventry City Council response to NBBC draft plan – Examination Document MM19

²⁶ Coventry City Council response to NBBC draft plan – Examination Document MM19

²⁷ Statement of Common Ground regarding CCC Proposed LP Modifications – MM24

24,600 homes equates to 58% of total need within the HMA. On a pro-rata basis this would equate to 6,960 affordable homes (348 per annum). This approach is supported by the neighbouring authorities within the HMA, and the majority of them have agreed to include higher proportions of affordable housing within their respective policies in order to maximise the potential to meet the needs of the HMA. LP Policy DS2 sets out a clear commitment to work jointly with the neighbouring authorities to deliver the wider affordable housing need.

65. Policy H6 seeks 25% of all dwellings to be affordable on new residential schemes of 25 dwellings or more or over 1 ha in size. The Affordable Housing Economic Viability Assessments (AHEVA)²⁸ made an appropriate allowance for S106 contributions and potential future Community Infrastructure Levy (CIL) contributions. It analysed a range of different types and size of development and assessed existing use values, factoring build standards and infrastructure contributions into a residual value appraisal model. An assessment of brownfield sites included an allowance for site preparation as well as a contingency margin. On the basis of the evidence, I consider that the proposed policy requirement for affordable housing is reasonable and is based on credible and robust evidence.
66. Policy H6 includes the flexibility to negotiate on a site by site basis. Proposed modification **MM63** to include specific reference to viability in the policy wording would ensure that this is clear. The AHEVA was updated and monitored to ensure that the evidence base underpinning it remains robust²⁹. There is evidence to show that since 2012 both build costs and property values have grown in the region of 20% whilst land values have remained broadly stable. There are also clear signs of an improving housing market and development viability. In addition, quarterly data on new build price changes published by DCLG reflect the conclusions reached in the updated AHEVA note.
67. The Council did assess whether reducing the threshold to, for example, 20 dwellings would make an impact. However, based on the SHLAA sites as well as one of the allocations, it was found that the uplift in delivery of affordable homes would be minimal (it would supply approximately 64 additional dwellings equating to 5% of the identified 1,500 affordable homes needed).
68. Registered housing providers operate in the interests of scale preferring to manage a higher number of properties on one site rather than a smaller number of properties on several sites. This is due to the cost benefits associated with the marketing and management of a higher number of properties. The site threshold of 25 dwellings would thus prove more cost effective for registered providers. The Council concluded that on balance this minimal contribution may potentially have a far greater impact on development viability and result in a reduced amount of homes delivered over the Plan period.
69. Furthermore, the affordable housing requirement proposed via Policy H6 is similar to that required under current policy provisions. The Council can demonstrate that affordable homes are being delivered under current policy

²⁸ Affordable Housing Economic Viability Assessment October 2012 (LP39)

²⁹ Affordable Housing Economic Viability Assessment Note May 2016 (LP131)

and point to evidence which shows that since 2012 there have been only 3 instances whereby the requirement was reduced for development where there were exceptional on-site costs which reduced the viability of providing affordable housing contributions. There is therefore a very good prospect that the affordable housing requirement for 6,960 dwellings within Coventry will be met over the Plan period.

70. The need for 12,000 additional affordable homes in Coventry over the Plan period represents approximately 28% of total housing growth. Given the capacity constraints in Coventry, the housing requirement cannot be raised to help meet more of the need for affordable housing, as suggested in the PPG. The Council acknowledges that it will have to undertake regular reviews of affordable housing delivery within the City and the wider HMA. **MM151**³⁰ amends the Plan's monitoring indicators accordingly.

The Housing Trajectory and the Five-Year Housing Land Supply

71. Policy H1, as submitted, set out a phased approach to the delivery of housing proposing to deliver 1,020 homes per annum in the first 5 years of the Plan period and 1,300 homes per annum thereafter. The Council produced an updated housing trajectory to reflect the small site windfall figure before the start of the hearings (Examination Document **MOD.2**). I consider this to be necessary to ensure that the Plan reflects the most up-to-date position and for housing delivery to be monitored effectively. The trajectory is broadly consistent with evidence from the SHLAA about the rate at which residential sites would come forward for development.
72. Policy H1 refers to the housing land requirement being phased to allow for the necessary step change to be managed in a sustainable way. It is acknowledged that this step change reflects the increase in deliverable land options which would be facilitated by adoption of the Plan. However, given that the identified housing need exceeds the proposed target, and that there is an immediate need for housing, a phased approach to the release of development land would not be justified. Furthermore, it would not be warranted on the basis of the longer lead-in time associated with bringing forward the strategic sites.
73. The annual provision rates in Policy H1 are not maximum figures and higher rates of provision would be permissible. It would thus be more accurate to describe this phasing as a stepped trajectory. **MM49** and **MM51** amend the policy wording and supporting text accordingly. The projected delivery of the housing land supply set out in Policy H1 would reflect the Council's updated housing trajectory.
74. The updated trajectory, together with Policy H1, as proposed to be modified as outlined above, will facilitate the quickest possible rate of housing delivery to help meet as much of the OAN as possible within Coventry's administrative area. It will thus be consistent with the NPPF's goal of boosting significantly the supply of housing. Proposed changes to the supporting text of Policy H1 would set out that the proportion of development of brownfield sites would be monitored with a view to encouraging brownfield development, though it

³⁰ Examination Document MOD.10

would be made clear that such monitoring data would not constitute a reason for refusing greenfield development (**MM53**).

75. The SHLAA identifies the housing supply for the next 5 year period against the equivalent housing requirement. This sets out both the 'Liverpool' and 'Sedgefield' approaches to 5 year supply monitoring. It has also considered the need for a buffer in line with the NPPF³¹. The SHLAA assessed a 5% and 20% buffer as well as the impact of a "phased" approach (better described as a stepped trajectory) as set out in Policy H1. It also assessed the 5 year housing supply assuming an "un-phased" (i.e. not stepped) approach.
76. Over the first 5 years of the Plan period, 2011 – 2015, the updated trajectory broadly reflects the amount of housing that has been completed. It is then predicted that there would be a step up in the annual rate, from 1,020 to around 1,300 up to 2031. This is to reflect improving housing market conditions and a predicted uplift in anticipated completions following adoption of the Plan and removal of the Green Belt policy constraint to development of the SUEs. An alternative method would have been to show the trajectory as a flat annual average of the overall housing requirement across the whole plan period. However, to adopt this approach would mean applying a retrospective requirement for the years 2011-2015 which would not accurately reflect the rate of delivery. Furthermore, the stepped trajectory reflects the actual pattern of need which is predicted to increase more rapidly after 2021.
77. The SHLAA demonstrates that a 5 year supply of housing will be available upon adoption of the Plan. It has taken into account previous completion rates against requirements. No allowance has been made for the release of land from the Green Belt within the first 5 years of the Plan. Turning first to the assessment of the "phased" approach (or stepped trajectory, as proposed), under the Liverpool assessment there would be a 6.05 years' supply and a 6.07 years' supply under the Sedgefield approach. The "un-phased" approach would see a 5.85 years' supply under the Liverpool assessment or 5.40 years' supply under the Sedgefield approach. Each of the scenarios can demonstrate that the supply is sufficient with either a 5% or 20% buffer apart from the "un-phased" requirement which would be just short of a 20% buffer.
78. The Council should set out clearly in the Plan on what basis the 5 year housing land supply is calculated including whether it adopts the Liverpool or Sedgefield approach and whether it can demonstrate that an appropriate buffer can be achieved, whether that be 5% or 20%. It is proposed, via **MM52**, to set this out in the supporting text to Policy H1. As I explained at the hearing, this would be necessary in the interests of clarity and to effectively monitor the 5 year housing land supply on an ongoing basis. The supplementary housing paper³² sets out an assessment of past delivery rates against a range of adopted and draft housing requirements from 1991 and 2015. Performance has been strong when measured against adopted plans' performance though weaker when assessed against draft requirements such as the Regional Spatial Strategy or older versions of the Core Strategy.

³¹ NPPF paragraph 47

³² Supplementary Housing Paper (2015): Examination document LP51

However, this has coincided with an increase in the City's housing needs and an economic recession.

79. Nonetheless, the Council has continued to maintain a 5 year land supply of housing throughout this time. The evidence shows that the delivery of new homes is increasing year on year in Coventry³³. There has been a step change in housing delivery since 2011 and a falling trend in demolitions since 2009. The trajectory shows that for the 4 years from 2011/12 to 2014/15 a total of 4,114 dwellings have been delivered which would be in line with the 1,020 units per annum anticipated. It is assumed that 1,527 units would be delivered during 2015/16. However, the up-to-date position shows that since 2011, 5,550 dwellings (equating to an average of 1,110 dwellings per annum) have been completed, as of 1 April 2016 (**MM48** and **MM148**). This suggests that there is no shortfall in required housing delivery since the start of the plan period, when assessed against the stepped trajectory. Some minor changes are proposed which reflect updated site capacity figures taking into consideration permissions and phasing to-date but these do not fundamentally alter the numbers (**MM55**).
80. The Council suggest that the Sedgefield method would be an appropriate basis by which to assess the 5 year housing land supply. The Sedgefield method is normally used whereby the shortfall of delivery in the first 5 years of the Plan would be recovered within the first 5 years after adoption of the Plan. When assessed against the stepped trajectory the evidence suggests that there would not be a shortfall in the first five years. However when assessed against an annualised requirement (1,640 dwellings per annum) there would be a shortfall of approximately 2,650 dwellings.
81. The delivery of 1,300 homes per annum as proposed under the stepped trajectory would make up this shortfall within the first 5 years of the adopted Plan. This approach would also be justified on the basis that housing delivery is dependent upon some large urban extensions that will require some lead-in time to ensure that critical infrastructure is in place in a timely manner. Furthermore, the anticipated lead-in and delivery rates for these large sites are supported by evidence from developers. Accordingly, I agree that the Sedgefield approach would be an appropriate basis upon which to assess the 5 year housing land supply.
82. The Council considers that a 5% buffer is required. I agree that this would be appropriate, on the basis that there has not been a record of persistent under-delivery of housing in Coventry. **MM52** is thus necessary to make clear the basis upon which the 5 year housing land supply is calculated.

Specific Policy Requirements for New Housing

83. Policies H3 and H4 set out requirements for new housing and Policy H8 relates to proposals for care homes and older persons' accommodation. A number of modifications are necessary to ensure that they are effective and consistent with national policy. Policy H3 requires that proposals for new housing should comply with a number of criteria, including that it should be located within prescribed distances from a list of public services and facilities including medical services, schools and bus-stops. The Housing Supplementary Paper

³³ Coventry City Council Examination Statement to Hearing Session 2: Housing Need

³⁴highlights that the majority of Coventry is already well served by those services listed in Policy H3. The policy seeks to ensure that any gaps in provision created by new development would be addressed through appropriate contributions from developers.

84. It was not the Council's intention that the wording of the policy would be overly prescriptive and criterion 7 (as submitted) says that contributions may be sought to address any deficiencies. However, to ensure that the policy is sufficiently clear and flexible, the Council seeks to change the wording by adding "wherever possible" to the requirement that "new development should be" within prescribed distances from the listed facilities and services (**MM57**). The supporting text would also be changed via **MM59 – MM61**. These changes would specify that transport and infrastructure must be considered from the outset. Also, that new homes should comply with access standards in terms of being within 400m to a bus stop. The changes would also refer to the need to facilitate improved bus connections where appropriate, to ensure that all sites have easy access to public transport and walking and cycling routes but that site specific circumstances would be considered on a case-by-case basis. The changes would also clarify that developer contributions would be sought where appropriate and where it would not have an unacceptable impact on scheme viability.
85. Policy H4 seeks to secure an appropriate mix of housing in accordance with the latest SHMA but acknowledges and lists circumstances whereby it might not be appropriate. Local planning authorities have the option to set additional technical requirements exceeding the minimum standards including an optional space standard. However, the PPG advises that they will need to gather evidence to determine whether there is a need for additional standards and justify setting appropriate policies in their local plans³⁵. To avoid inference that the Council would seek to influence the size of new dwellings through this policy and to aid clarity, I consider that the proposed modification to remove reference to house sizes (**MM62**) is necessary.
86. Furthermore, I consider that the Plan's provisions for inclusive design and accessible environments are consistent with the NPPF. In reaching this conclusion, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty (PSED).
87. The supporting text to Policy H8 says that at least 10% of new homes within the SUEs at Keresley and Eastern Green should be provided to support extra care provision. However, there is no detailed evidence to justify this requirement and for this reason the Council says that it has not sought to embed the provision within the policy wording itself. This is something that would be better considered at the master planning stage and **MM67** would make this clear. The supporting text also refers to 'Lifetime homes standards'. However, as these standards no longer apply, it is proposed to remove this reference through **MM68**. I consider that these modifications to

³⁴ Supplementary Housing Paper (2015): Examination document LP51

³⁵ Planning Policy Guidance Paragraph: 002 Reference ID: 56-002-20160519

Policy H8 would be necessary for the policy to be effective and consistent with national policy guidance³⁶.

88. Proposed changes to the supporting text of Policy H10 would update the number of purpose built student accommodation bed spaces currently benefitting from extant permission (**MM69**). This would provide additional clarity in terms of the most up-to-date data. The inclusion of an additional criterion in Policy H11 is necessary to set out clearly that proposals for homes in multiple occupation would not be permitted where the amenity and living standards of future occupants would be materially harmed (**MM70**).

Conclusion on Issue 1

89. To conclude on Issue 1, I find that, subject to the necessary main modifications recommended in the interests of soundness, the Plan appropriately identifies housing needs and sets out effective measures to meet them in accordance with national policy. In reaching this conclusion, and in my conclusion on Issues 2 and 5, and in all other matters, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty (PSED).

Issue 2 – Does the Local Plan make adequate and appropriate provision to meet the accommodation needs of gypsies, travellers and travelling show people?

90. The Planning Policy for Traveller Sites (August 2015) (PPTS) places requirements on Local Plans in respect of this matter. A robust evidence base should be prepared, including early and effective community engagement with both settled and traveller communities (PPTS policy A). Pitch targets should be set and a supply of sites identified (PPTS policy B).
91. The Council undertook a Gypsy and Traveller Accommodation Assessment (GTAA) in 2014. No substantive criticisms were raised in respect of either the methodology of the study or its conclusions. I have no reason to take a different view. The assessment identified two permanent sites in Coventry. The Council-owned site in Siskin Drive has only 4 pitches and these are occupied as the site is in need of refurbishment. The private owned site at Burbages Lane has all its 14 pitches occupied. The assessment identified a need for 34 permanent pitches over the next 5 years, though 5 of these related to the assumed needs of existing families currently living in bricks and mortar accommodation as well as assumptions linked to the Census data.
92. The Council maintains, having regard to the guidance in PPTS³⁷, that the 5 households identified as living in bricks and mortar accommodation have abandoned a nomadic way of life in favour of residing within traditional accommodation as opposed to mobile homes. In view of the available evidence and on the balance of probabilities I share this view. This would mean that there is an identified need for 29 pitches.
93. It is intended that 16 pitches will be provided at the Council-owned site once it is refurbished. These 16 pitches added to the 14 in private ownership would

³⁶ Planning Policy Guidance Paragraph: 001 Reference ID: 56-002-20150327

³⁷ Planning Policy for Traveller Sites (August 2015) Annex 1

provide a total of 30 permanent pitches. In terms of the longer term need, the assessment identified a requirement for 6 additional pitches to 2031. However, criteria-based Policy H7 would facilitate the delivery of new windfall sites for permanent pitches over the Plan period. This would also enable any needs arising from those families who have ceased to travel, but would still require caravan pitches, to be met. This will be kept under review by the Council. Changes proposed to the supporting text of Policy H7 via **MM66** would provide further clarity to the Council's approach to the land supply for Gypsy and Traveller sites.

94. In addition to permanent pitches the assessment identified a need for 6 temporary or transit pitches. There has been an increase of illegal encampments over the last two years with over 70% of all occurrences taking place in this time. The evidence thus suggests that the need for transit accommodation is infrequent, and may reflect a short term trend rather than a longer term requirement.
95. It may be possible for the Council to respond to short term transit requirements through the use of temporary stopping places as the monitoring of illegal encampments suggests such sites would only be required for a short time. Longer term, the Council will monitor whether the recent trend for more frequent illegal encampments continues. Should a formal transit site be required, the Council intends to manage this via Policy H7 which would allow for such sites to come forward and through its 'Supporting Housing Delivery Development Planning Document'.
96. The Council will also consider whether there is a need for a targeted review of the Plan in accordance with Policy DS1 and the Monitoring Framework (as proposed to be amended). This is reflected in revised wording of the supporting text to Policy H7 (**MM65**). These changes are necessary in order for the Plan to be effective, justified and consistent with national policy.

Conclusion on Issue 2

97. For these reasons, and subject to the changes recommended, I conclude that the Local Plan provides satisfactorily for the needs of Gypsies and Travellers, consistent with national policy.

Issue 3 – Whether the distribution of development within Coventry City Council is sufficiently justified and consistent with the local evidence base and national planning policy?

98. The SA³⁸ considered what would be an appropriate level of growth for Coventry as well as the strategic approaches to delivering planned growth over the Plan period. The Coventry and Warwickshire neighbouring authorities also undertook a joint informal SA³⁹ to consider the spatial and functional relationship between Coventry and its neighbours. It also assessed strategic options in relation to the distribution of development to meet the unmet need outside of Coventry's boundary. However, in terms of a more detailed assessment of the proposed distribution within each administrative area, it

³⁸ Sustainability Appraisal/Strategic Environmental Assessment Report (January 2016): Examination Document LP8

³⁹ MOU Appendix – Examination Document LP10

was agreed that it would be the responsibility of individual authorities through their own SA/SEA and plan making processes. Each local planning authority has a legal obligation to undertake a SA of the effects of their own plans and projects.

99. The SA of Coventry's LP considered all relevant and reasonable alternatives and pursued the most appropriate approach to delivering its strategic development needs. The appraisal of all reasonable alternative growth projections were also considered as part of the SA process. Initial analysis through the SHLAA pointed to approximately 17,000 new homes being capable of being delivered in the existing urban area, representing 80% on brownfield land. However, changes to Green Belt boundaries would be required to accommodate homes to meet Coventry's housing need. As outlined earlier in this report, it was identified that it would not be possible to provide all the required housing in Coventry without there being significant and unacceptable impacts on historic landscapes and the natural environment. It was shown that a proportion of development would need to be provided in the wider Warwickshire HMA area. Also, options to meet the development needs of Coventry more sustainably may exist adjacent to the City's boundary.
100. I am satisfied that the broad approach of seeking land to meet the growth needs of Coventry in the form of urban extensions to the existing built-up area is justified. Given that the built-up area is so tightly constrained, the decision to assess potential sites in neighbouring local authority areas – as well as within the City – is also justified. A robust assessment of suitable sites within Coventry has been carried out through the SHLAA process. A significant number of sites have been allocated for development within Coventry although, as set out above, these are not sufficient to meet Coventry's overall housing requirement.
101. For these reasons, the approach that has been taken fully accords with the spirit and intentions of the Duty to Co-operate, as described at the start of this report. Paragraph 179 of the Framework states that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. It adds that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. The broad approach of the Plan towards meeting the growth needs of Coventry accords with national policy in this regard.
102. The preferred approach was directly informed by the joint SHMA, the Coventry SHLAA and was fully tested by the SA/SEA process. The Habitat Regulations Assessment (HRA)⁴⁰ concluded that neither the Local Plan nor the AAP were considered to have any likely significant effects on any European Sites alone or in combination with their plans or projects. The proposed approach represents a sound basis to deliver Coventry's development needs. The spatial strategy strikes the appropriate balance between the 3 aspects of

⁴⁰ Habitat Regulations Assessment: Examination Document LP76

sustainable development as set out in the NPPF⁴¹. It focuses on continued urban regeneration and the sustainable growth of the City into greenfield and Green Belt locations. I deal with the issue of Green Belt elsewhere in my report. However, it is clear from the evidence that reasonable alternatives were considered and that the preferred strategy is the most sustainable.

103. The SHMA was the starting point for considerations relating to the apportionment of housing to be delivered in each authority across the HMA. Ongoing collaboration through the DtC group and Coventry and Warwickshire Joint Committee ensured that the full housing needs of the HMA were assessed. In addition, realistic assumptions about the availability, suitability and viability of land to meet that need were established, in accordance with the NPPF⁴².
104. To this end, the Council shared its housing land supply data with its neighbouring authorities, including the assessment matrix and density assumptions. It also collaborated with neighbouring authorities to agree its SHLAA procedure. In undertaking the assessments of sites through the SHLAA process the Council completely re-assessed sites in 2015 to take account of the Joint Coventry and Warwickshire SHLAA methodology⁴³. The methodology drew on a range of evidence about the Green Belt, ecology, the historic and natural environment, biodiversity, infrastructure and flood risk. This process ensured that strategic issues regarding the level and distribution of housing growth was supported by a shared and sound evidence base. It also ensured that decisions taken in respect of the suitability and viability of sites for development was supported by a rational process and were robust and justified.

Conclusion on Issue 3

105. For these reasons, I conclude that the Local Plan's proposed distribution of development is adequately justified, that the decision to accommodate some of the growth needs of Coventry within the wider HMA is appropriate and that the methodology of selecting sites, is robust and transparent.

Issue 4 – Does the Local Plan comply with national planning policy in its approach to the Green Belt? Are the allocations of Green Belt land including land for Sustainable Urban Extensions (SUEs) at Keresley and Eastern Green justified and deliverable? Are the allocated sites appropriate and deliverable? Should additional Green Belt or other allocations be made? Are the detailed requirements for the allocations clear and justified?

National Planning Policy and the LP Approach to Green Belt

106. Policy GB1 sets out the approach to Green Belt land including areas that would be removed from the Green Belt to accommodate development. NPPF paragraph 83 says that alterations to Green Belt boundaries should only be made in exceptional circumstances. The Plan sets out why it is considered that exceptional circumstances exist to justify the release of land from the

⁴¹ NPPF paragraphs 7 and 14

⁴² NPPF paragraphs 159 and 160

⁴³ SHLAA Joint Method Statement (May 2015) Examination Document: LP52

Green Belt. As outlined above, the evidence shows that significant growth is anticipated for the area. The City's tight administrative boundaries together with the shortage of available land and diminishing opportunities to develop brownfield sites means that there is a lack of reasonable and appropriate alternatives. There is a need to diversify the housing stock and to meet identified needs for market and affordable housing. Furthermore, there is a need to provide employment land to support planned economic growth.

107. Alternative approaches were considered including increasing density of development on brownfield land and locating development beyond the Green Belt outside of Coventry. However, increasing densities would not provide sufficient capacity to deliver the required housing at the accelerated pace required nor provide adequate opportunities to diversify the housing supply. The Coventry and Warwickshire Housing Requirements MOU highlights the importance of locating development either adjacent to the City's boundary or along key transport corridors to facilitate accessibility to the City. Seeking to deliver the growth beyond the Green Belt would lead to development located in areas detached from Coventry and increase unsustainable patterns of commuting. It would also have implications in terms of being able to meet the HMA's housing needs, in particular affordable housing.
108. Unless some of the Green Belt is released, a substantial level of new dwellings - amounting to nearly one third of the planned supply - would not be delivered. The scale of potentially unmet need in the City is exceptional. The selective release of parcels of Green Belt to provide in the region of an additional 7,000 dwellings would make a very substantial contribution towards meeting the shortfall. However, even with the release of the Green Belt and greenfield sites the Plan will leave a shortfall of nearly 18,000 dwellings that will need to be met elsewhere in the wider HMA. The DtC requires neighbouring authorities in the HMA to help meet the shortfall, in line with the MOU. It also requires that Coventry City Council should seek to maximise housing land provision within its own administrative boundary to meet the identified need. The release of Green Belt sites is necessary to do this. I deal with the issue of Green Belt release below. However, the Plan refers to factors that amount to "very special" circumstances. However, it should refer to "exceptional circumstances" (**MM89**) in order to be consistent with the wording of the NPPF.
109. Several representations were made in respect of the Inspector's report on the Core Strategy 2009 in respect of his findings on the proposed release of Green Belt land. I have considered the Inspector's conclusions on the soundness of allocation of land within the Green Belt in the Core Strategy. However, I find that the circumstances of the Plan before me for examination are very different. The evidence shows that an unprecedented level of growth is required – Coventry is the second fastest growing City in England outside of London⁴⁴. As outlined above, this growth cannot all be accommodated within Coventry's administrative boundary which has necessitated a review of Green Belt land as part of the commitment to maximising the amount of development that can be accommodated elsewhere as part of the Duty to Cooperate.

⁴⁴ C&W Joint SHMA 2015 Update (LP45)

110. I have considered the suggestion that the greenfield sites should be released later in the plan period, and only released once the brownfield sites have been developed. Whilst the reuse of previously-developed land is encouraged in the NPPF, such an approach would run contrary to the overwhelming evidence of shortage of other land in the city to provide for the levels of housing and employment development that are necessary. As already referred to elsewhere in this report in respect of phasing, given the significant lead-time required for building on these strategic sites, it would also jeopardise the contribution they are required to make towards meeting needs during the Plan period. As such, I do not consider that this would be a sound approach.
111. A number of reviews of the Green Belt have been undertaken, the most recent of which was undertaken in 2015⁴⁵. This was a comprehensive assessment of the 5 purposes of Green Belt as set out in the NPPF⁴⁶ which covered the entire Green Belt of Coventry and Warwickshire. As part of the overall assessment, the Council undertook a Green Belt Matrix Assessment⁴⁷ which comprised a number of studies to consider potential environmental effects together with historic environment and infrastructure implications. The SA/SEA was an integral part of that process. The Coventry and Warwickshire Green Belt study assessed each parcel of Green Belt land against the purposes of Green Belts as set out in the NPPF and applied scoring criteria as part of the jointly agreed methodology with the adjoining authorities in the HMA.
112. In response to concerns raised by participants at the examination hearing, the Council engaged LUC – who undertook the 2015 Joint Green Belt Review – to jointly clarify a few matters. In their statements LUC⁴⁸, together with the Council⁴⁹, confirmed that the parcel of Green Belt at Eastern Green (parcel c25), along with all the other parcels, had been measured from the edge of the urban area through the centre or edge of the parcel. In no circumstances had measurements been taken from the centre of the parcel. Also, whilst parcel c25 is in multiple land ownership, it had been measured consistently with how other parcels were measured. The Council confirmed that in fact, the vast majority of parcels are in multiple ownership, with only 3 of the 28 parcels in single ownership.
113. In respect of whether the assessment of historic character for parcel c25 has failed to consider the listed building at the Windmill Hotel, the Council point out that the Joint Green Belt Review makes no reference to listed buildings having an influence on Green Belt policy or the assessment process. As LUC have confirmed, historic towns were considered in the assessment. However, whilst many settlements have historic elements, one of the Green Belt purposes set out in the NPPF aims to 'preserve the setting and special character of historic towns'. It is thus only relevant to settlements of a certain size i.e. towns. In particular, towns that retain a historic character connected to surrounding landscape elements. I consider that this is a sound approach to the assessment.

Are the detailed requirements for the allocations clear and justified?

⁴⁵ Coventry and Warwickshire Green Belt Review 2015: Examination Document LP70

⁴⁶ NPPF paragraph 80

⁴⁷ Coventry Green Belt Matrix Assessment January 2015: Examination Document LP77

⁴⁸ LUC Green Belt Review Update Note (October 2016): Examination Document LP251a

⁴⁹ CCC response to Action Point 8.2: Examination Document LP251

114. The Council and developers of the Eastern Green and Keresley SUEs produced 'Statements of Common Ground' for the examination which set out proposed uses of the sites and broad agreement of capacity and in some cases general infrastructure requirements. It was agreed during the examination that including these details in the Plan itself, rather than in the supporting documentation would provide a greater level of clarity in respect of informing infrastructure and master planning requirements of each of the strategic sites and more certainty that they would be delivered as planned. These overarching frameworks would establish Masterplan principles and design concepts that would inform more detailed subsequent planning applications. As such, a new key policy for each of the strategic sites is proposed to be included in the Plan.
115. The Masterplan general principles for each of the large strategic sites and for major development would be set out in new Policy DS4 (Part A) (**MM31**). Specific Master Plan principles for the Whitley employment hub and Keresley and Eastern Green SUEs would be set out in new Policy DS4 (Part B to Part D). In addition, the reasoned justification would set out how the new policies would provide an overarching framework setting out requirements relating to land use, densities, community facilities, transport, infrastructure, open spaces and phasing. This approach would retain a degree of flexibility as more details would be provided in future master plans. However, sufficient detail would be provided at the strategic stage to assist in bringing forward the sites.
116. The new policy would support the longer term delivery of the strategic allocations through identifying necessary infrastructure required for each phase of development and the likely timing of delivery (**MM16**). This would be achieved through a cross-reference to the IDP which would be regularly updated and linked to the Plan's monitoring framework. These changes are considered necessary to ensure that sufficient policy detail is embedded within the Plan to enable all relevant factors which will influence the delivery of the strategic sites to be taken into consideration and to improve the Plan's clarity and certainty.
117. All major development proposals will be required to demonstrate that they would not have an unacceptable impact on health and wellbeing. The Council is preparing a Health Impact Assessment (HIA) Supplementary Planning Document (SPD). Proposed changes to the supporting text of Policy HW1 are necessary to clarify that the SPD will build upon the health impacts toolkit being developed by Birmingham City Council and is expected to be rolled out across neighbouring authorities within the HMA (**MM32** and **MM33**). Policy HW1 relates to major development proposals, and as such, further changes are also necessary in respect of the thresholds above which, HIAs would be required (**MM34**). This is to ensure that the requirements of the policy would not be overly onerous in respect of development required to deliver the Plan's proposed objectives. The Plan makes clear that HIA can be undertaken as part of the wider SA/SEA or as stand-alone assessments. Also, that the extent of assessment undertaken will depend upon the scale and type of development proposed and will be considered on a case by case basis.

Impact of Planned Road Infrastructure on the Green Belt

118. It is anticipated that the proposed distributor road at Keresley would be entirely within the SUE and thus would not have any further impact on the Green Belt. The proposed grade separated junction at the A45 would require a small area of land north of the A45 to be developed. Removal of land from the Green Belt to accommodate it was considered but it lacked clear defensible boundaries. The utilisation of an at grade junction was also considered but was discounted on account of the likely impact it would have on traffic flows, noise and air quality. A grade separated junction was thought to be the most sustainable arrangement.
119. Appropriate planting would assist to assimilate the road into its surroundings and limit any impact on openness. Such details would be subject to a subsequent application in any event. Furthermore, the NPPF⁵⁰ identifies local transport infrastructure which can demonstrate a requirement for a Green Belt location to be "not inappropriate in a Green Belt". Given the importance of enabling appropriate access to the SUE the Council considers the completion of a grade separated junction to be local transport infrastructure which would demonstrate an essential requirement for a Green Belt location. Other items of infrastructure which would require a Green Belt location are set out in proposed changes to the Plan (**MM56**).
120. The issue of whether these items of infrastructure should be included in the Policies Map was considered at the hearing. However, I agree with the Council that at this stage the intended route is unknown and any identification on the Policies Map could only be indicative. Instead the broad principles would be included in the new policies DS4 and the IDP which would be further developed at the master planning stage.

The Green Belt Policy Approach

121. Policy GB1 relates to Green Belt and local green space, with the proposed changes to those boundaries identified on the Policies Map. Some changes are proposed via **MM92** to ensure that the policy is consistent with national planning policy. A cross-reference to the NPPF is also necessary (**MM93**). A new criterion within the policy (**MM90**) will also make clear that the erection of small ancillary buildings and structures would be permissible in areas designated as Local Green Spaces (LGS). **MM91** removes reference to "local urban green space" from Policy GB1 and is necessary for consistency and clarity. Changes to the supporting text of Policy GB1 would also be necessary to clarify how development in areas designated as LGS would be considered against local policies and national planning policy (**MM94**).
122. The Plan seeks to re-define some areas defined as Green Wedges as LGS. This was supported by the recommendations and conclusions of the Joint Green Belt Review. In redefining these areas the Council agrees with the study in that they no longer reflect the purposes of Green Belt, particularly in relation to the separation of settlements or the managed growth of urban areas. Where they still remain relevant is in relation to their recreational, ecological and biodiversity value and in providing a valuable local amenity. The proposed amendments to GB1 and its supporting text would help to

⁵⁰ NPPF paragraph 90

protect these areas by restricting development to that which supports the sites' purposes as green space.

123. The NPPF⁵¹ does not recommend LGS designations for large tracts of land such as Green Wedges. Whilst the proposed LGS designation along the Sowe Valley may be seen as large, it is not extensive or unrelated to local communities⁵². PPG⁵³ reflects the NPPF in respect of large tracts of land not being designated as LGS but also says that there are no hard or fast rules about how big LGS can be. Development in these locations would effectively be limited to infill or controlled growth thus reducing the likelihood of urban sprawl. Furthermore, in defining the areas of LGS the Council has sought to minimise any harm to the remainder of the Green Belt.

Reserved or Safeguarded Land in the Green Belt

124. The submitted Plan sought to reserve land in the Green Belt that was separated by two administrative boundaries – namely, Coventry City Council and Warwick District Council. The Council sought to support any approved allocation by Warwick District Council in that area and to avoid creating Green Belt 'islands' in Coventry. However, the status of 'reserved' land is unclear as it is not set out in national planning policy. It is also uncertain how such land would come forward within the Plan period if necessary, other than through a Plan review. As such, to provide clarity **MM95** amends Policy GB2 to refer to this land as 'safeguarded' rather than 'reserved' and clarifies that safeguarded land would be considered as part of any subsequent Plan review if the development proposals in Warwick District Council come forward during the Plan period (**MM96** and **MM97**). I consider these changes to be necessary in order to be consistent with national planning policy and for the effective delivery of the Plan.

Keresley SUE Allocation

125. It is proposed that the allocation will include development of approximately 3,100 dwellings of which 25% will be affordable housing. In addition, two new primary schools, a secondary school, a local health facility, two new local centres as well as green and blue infrastructure. The Council assessed a number of constraints as part of the SA/SEA process which led to the selection of the area proposed for the SUE. A summary of these is provided in the Council's statement for Hearing Session 8⁵⁴. The Green Belt Matrix Assessment⁵⁵ includes an assessment of all of the Green Belt parcels. The Development of this site would clearly represent some reduction in openness. However, key views and features would be protected and given the immediate context of existing development, the reduction in openness would not be significant. It would not have a significant effect on the purposes of including land in the Green Belt in this case.
126. One of the key aspects of delivery of the site will be the proposed link road. This piece of infrastructure will be necessary to support the distribution of

⁵¹ NPPF paragraph 77

⁵² CCC Hearing Statement to Hearing Session 8 (LP205)

⁵³ Paragraph:015 Reference ID: 37-015-20140306

⁵⁴ CCC Hearing Statement to Hearing Session 8 (LP205)

⁵⁵ Examination Document LP77

traffic around the site and wider area. The Council will work with Highways England and the County Council to consider medium-longer term enhancements to the M6 junction 3 and the strategic route that connects the M6 to the north and the A45 to the west.

127. The new link road would be included as part of this wider strategic connectivity. The Council is also exploring options for the growth of Pro Logis Park which would help justify connectivity of the link road. However, this remains part of ongoing discussions with N&BBC as it is outside Coventry's administrative boundary. Longer term, the Council anticipates wider strategic improvements to the M6 to be supported by devolution deal funding and other sources of finance. This is anticipated to come on stream between 2021 and 2026 to assist completion of the link road which would support the subsequent delivery of later phases of the SUE. Proposed changes to Policy H2:1 (**MM54**) would refer to the need for appropriate junction improvements together with the protection of Jubilee Woodland and the need for appropriate screening to the existing residential areas.
128. Transport assessments were undertaken including traffic counts against the multi-modal Coventry Area Strategic Model (CASM) developed by Coventry CC and Highways England. The model was calibrated using a 2013 baseline and modelled various scenarios up to 2031 with a number of committed and planned highway measures in place. Account was taken of new development within and potentially adjacent to the City boundary. Highway modelling scenarios were run on a 'worst-case' basis with no adjustments made for demand management, peak spreading, increased public transport patronage or walking and cycling. From the Keresley SUE site 3,100 houses would generate 1,680 vehicular trips in the AM peak. The model shows that traffic would disperse fairly evenly when leaving the site in the morning peak hour. Similarly, there would be no unacceptable impacts resulting from planned development during the PM peak hours.
129. During the examination the CASM was updated⁵⁶ to take account of different scenarios with a forecasting year of 2034. In addition to the LP development scenarios, an assessment was also undertaken to ascertain the impact on the highway network for various stages of the Keresley development, without the Keresley link road. The model shows that as the number of houses increases, without the link road, there would be an increase in traffic but that these increases would be less than 5% and could be accommodated on the highway network.
130. With the link road in place, there would be journey time improvements but more traffic on some connecting roads. However, these could be accommodated without any unacceptable impacts on traffic congestion. The link road would also reduce traffic volumes on Tamworth Road and Sandpits Lane. The monitoring framework (as amended via **MM151**⁵⁷) would monitor progress of delivery of the new link road prior to full completion of the SUE as well as completion of the new A45 junction. Development progress would be monitored and occupation linked to relevant triggers within the monitoring framework.

⁵⁶ Transport Modelling Update (December 2016): Examination Document LP259

⁵⁷ Examination Document MOD.10

131. Whilst the assumptions and projections represent a snap shot in time and will require delivery of supporting infrastructure, I am satisfied that the proposed SUE could be delivered without unacceptable impacts on the highway network. Policy AC3 would ensure that each phase of development is supported by appropriate and timely travel planning and assessment at the planning application stage.
132. I have already considered the spatial strategy and the need to deliver sufficient housing to meet the Plan's requirements. I have also concluded that changes to the Green Belt boundaries are required to meet the identified need for growth. These factors, along with limited opportunities outside of the Green Belt elsewhere in the City amount to exceptional circumstances which justify altering the boundaries of the Green Belt in order to allocate the Keresley SUE. The proposed allocation is justified, effective and consistent with national policy.

Eastern Green SUE Allocation

133. It is proposed to develop approximately 2,250 dwellings including 25% affordable houses, 15 ha of employment land, a new local health facility, a primary school and a new Major District Centre together with blue and green infrastructure at the Eastern Green SUE. The Council acknowledge that one of the key challenges of delivering this site will be securing appropriate site access. The master planning work to-date has explored the options of pedestrian and public transport connections to the existing local highway network. In addition a new junction to the A45 would resolve existing access issues. This would need to be delivered up front to support access to the site. As outlined above, the Council are considering the exact details of this junction including a grade separated junction – upon which the strategic transport modelling has been based. The new Policy DS4 will set out specific master planning principles for the site including the need to make appropriate provisions for new transport infrastructure and highway improvements to support comprehensive delivery of the site.
134. Policy H2:2 as submitted, requires that the 15ha of employment land is brought forward in advance of the residential development. Whilst the Council is concerned that the employment element of the mixed-use site would not come forward until after development of the residential element, as currently worded, the policy implies that there would be an inflexible phasing approach imposed on the site. This may hinder the ability to deliver the site and to ensure that there is a timely delivery of new homes, including much needed affordable homes. As such, the wording of the policy needs to be changed to clarify that the employment land should be developed in tandem with the residential element (**MM54**). Other changes to Policy H2:2 proposed by **MM54** would refer to the necessary junction improvements and to screening to manage the transition of land use into the wider Green Belt.
135. The Meriden Gap is not formally designated but refers to the area of land separating Coventry from the wider urban edge of Greater Birmingham (starting at Solihull). The village of Meriden is broadly located at the centre of that 'gap' along with a number of other villages. The Council has considered the relationship between Coventry and each of these locations, including the spatial relationship and the distance between them and proposed development

within the Plan. This has also been considered through the DtC with Solihull BC as the majority of the gap and villages within it lie within its administrative boundary. The gap between Coventry and Solihull extends approximately 5 miles at its narrowest point and when the proposed development at Eastern Green is considered, this gap does not reduce. This area of development has been supported in principle by Solihull BC which has promoted development around the HS2 station proposed in this area. This development would reduce the gap by approximately 1 mile.

136. The Council's Green Belt reviews identify the possible reduction of the gap and the impact on its wider setting. However, in relation to the Eastern Green development, the Green Belt assessment conducted in 2007 identified the southern part of the site as having potential for development. The study conducted in 2015 also scored the area lower in recognition of the urbanising features towards the north east of the site around the golf course and hotel. There is also the Meriden Business Park along the northern edge of the A45 and Land Rover dealership which provide an urban frontage in this area.
137. The gap between Coventry and Meriden would not be reduced by development at Eastern Green. The Council is working with Solihull BC to ensure that a strategic gap between Coventry and Solihull will be retained through the ongoing DtC work. Furthermore, I agree with the Council that when travelling to and from Coventry and Meriden along the A45, the village is not visible from the road or from the western edge of Coventry.
138. The gap between Coventry and Hampton in Arden would remain unchanged by the proposed allocation. In relation to the proposed development at Cromwell Lane the impact would not be significant given its location beyond Balsall Common and Berkeswell. The development would be approximately 4.4 miles from the settlement. I have considered the Inspector's comments in relation to the Meriden Gap for the CS (2009) examination. However, there has been a significant change in circumstances given the level of growth now identified for Coventry. Furthermore, there are fewer opportunities for development given that some of the alternative sites identified for the CS (2009) have now been developed. In any case, the direction of growth planned for the SUE would not reduce the physical or visual separation between the western edge of Coventry and Meriden. Pickford Green would be kept separate through a green buffer zone defining the north western extent of the development. As outlined above, changes to Policy H2:2 would set out this requirement clearly. Development of the SUE would not have a significant effect on the purposes of including land in the Green Belt.
139. The Eastern Green SUE would not have a significant impact on the local highway network in terms of delay or average speed. Local roads would see an increase in traffic as a result of the development but would have the capacity to accommodate it. Journey times on roads close to the development are anticipated to increase by up to 42 seconds on a journey of over 8 minutes which equates to a 9% increase. I consider this later in my report.
140. For the above reasons, there are exceptional circumstances which justify altering the Green Belt in this case. The proposed site allocation at Eastern Green is justified, effective and consistent with national policy.

Are the Local Plan's policies and proposals for other allocated sites in the Green Belt justified and deliverable?

141. The Walsgrave Hill Farm site would be developed for housing within the Green Belt adjacent to the existing built up area of Eastern Coventry. It is proposed to retain significant areas of green infrastructure to support the required drainage and flood risk mitigation in the area. Highways England propose a new grade separated junction along the A46 which would support a new spine road through the site allowing an appropriate access as well as supporting cross boundary development in Rugby BC. Proposed changes to Policy H2:3 would include reference to this as well as necessary drainage and flood risk infrastructure (**MM54**).
142. The site at Browns Lane would provide approximately 475 houses. Part of the site adjoins an employment site – Lyons Park - but it is surrounded on other sides by residential development. The Council has considered the site's relationship with the Coundon Wedge and found that extending the allocation to the highway would allow for better access and not impact on it. I find no reason to disagree and appropriate green infrastructure and landscaping could enable the development to be screened from the highway. **MM54** would reinforce the importance of retaining important trees and hedgerows as well as the need to focus the primary access at Coundon Wedge Drive.
143. The allocation at Sutton Stop would provide approximately 285 dwellings as well as a marina and 1.5 ha of employment land. One half of the site benefits from extant planning permission. Development of the rest of the site would provide an opportunity for highway improvements to support the allocation and help alleviate existing highway pressures in the area. It would also offer opportunities to link with the canal towpath network incorporating rights of way and promoting active travel. The Joint Green Belt review describes the area as sitting between Coventry and Bedworth. However, the parcel of Green Belt land does not play a separating role between the two settlements as the two have effectively merged by the development to the west.
144. The site at Cromwell Lane comprises 4 parcels and would provide approximately 240 dwellings. The importance of providing a clear boundary and buffer to the wider Green Belt is set out in Policy H2:8. **MM54** makes reference to ensuring there would be defensible boundaries to listed buildings within and adjacent to the site through appropriate screening including to existing residential areas. **MM54** would also include reference to the need for junction improvements. The site is located on the edge of the Coventry urban area. The recent redevelopment of the former sports centre reflects a western expansion of the City's urban area in this direction. However, the proposed allocation would not intrude further west than the existing urban area. The site would make a substantial contribution to the supply of housing land. Development would not have a significant effect on the purposes of including land in the Green Belt. As set out above, there are exceptional circumstances which justify altering the boundaries of the Green Belt.
145. The gap between Coventry and Balsall Common and Berkswell was also considered as part of the Joint Green Belt Review in 2015. The distance between the narrowest point between the east of Balsall Common and the western edge of Cromwell Lane is approximately 1.4 miles which would reduce

to 1.3 miles should the allocation be developed out to the City boundary (which is not proposed but presents a worst case scenario). The allocation would thus not have any significant impact on the openness or separation between Coventry and Balsall Common. The Green Belt assessment of 2009 considered this site as the least constrained parcel and although concerns were raised at the CS examination, there are some notable differences from that scheme to the one now proposed, with particular regard to the proposed woodland planting, reduced density and extent of the proposed allocation which would have less of an impact on the wider Green Belt in this location. Solihull BC has not raised any concerns in this regard through the DtC joint work. Proposed green infrastructure to the western edge of the site would assist with screening the development from the wider Green Belt.

146. The Council acknowledge that concerns were raised by residents in respect of securing an appropriate access and traffic congestion. Initial highway modelling has not identified any significant concerns. The CASM predicted that the volume of trips associated with the development would be low, representing under 7% of traffic on the local highway network. The development would slightly increase traffic on Cromwell Lane but would not have a significant impact on delay or average speed. Journey times near the development would remain very similar with only a few seconds increase whilst increases in junction delay would be less than 20 seconds.
147. Nonetheless, the Council are exploring how to manage more detailed access and junction improvement options in advance of any planning application in partnership with Warwickshire County Council and the transport arm of the West Midlands Combined Authority. It is also considering how to alleviate parking and highway pressures that exist due to the Tile Hill railway station park and ride facility including increasing the number of parking spaces and expanding the residents' parking permit scheme. The Council consider that there are no insurmountable barriers to development of the site and I see no reason to disagree.
148. The London Road/Allard Way site would provide approximately 200 dwellings within the existing urban area of Coventry between the residential areas of Whitley and Willenhall and is well served by public transport as well as being near to key services and facilities. The two locally listed structures on the site would need to be retained and incorporated into the site and this is set out clearly in Policy H2:9 (**MM54**)⁵⁸.
149. In light of the above, and my wider conclusions in relation to the significant growth anticipated in the area, the City's tight administrative boundaries together with the shortage of suitable, available land there are exceptional circumstances to justify alterations to the Green Belt boundary in order to allocate these sites, and the others identified in the Plan, for development. The proposed allocations are justified, effective and consistent with national policy.

Other Site Allocations

150. The allocation at Whitmore Park would comprise of residential and employment development. Part of the site has already been developed with

⁵⁸ Examination Document MOD.3

106 dwellings completed, 47 under construction and 76 with extant planning permission. The remainder of the site is subject to ongoing pre-application discussions between the developer and the Council.

151. The development of Paragon Park would offer opportunities to develop and regenerate a former employment site for approximately 700 houses and to link these new homes to employment within the surrounding area. The allocation has an extant planning permission which includes an initial masterplan layout.

Should other Green Belt or greenfield allocations be made?

152. There is no compelling evidence before me that development needs during the Plan period or beyond it would justify allocating other Green Belt sites for development. The evidence supports the soundness of the allocations proposed in the Green Belt and the Council's decision not to allocate any other Green Belt sites in the Plan.

Conclusion on Issue 4

153. For the above reasons I conclude that, subject to the MMs that are necessary for soundness, the Plan complies with national planning policy in its approach to the Green Belt; that the allocations of Green Belt land, including the SUEs at Eastern Green and at Keresley, would not have a significant effect on the purposes of including land in the Green Belt, either alone or in combination with the other allocations of land in the Green Belt and are justified and deliverable; and that no other Green Belt or greenfield allocations are necessary. Furthermore, the allocated sites are appropriate and deliverable and the detailed requirements for their delivery are clear and justified.

Issue 5 – Does the Local Plan provide the infrastructure necessary to support the delivery of development?

154. The Plan sets out how the Council will work in partnership with neighbouring local authorities, Local Enterprise Partnerships, the West Midlands Combined Authority (WMCA) and others to deliver the necessary infrastructure to support growth. Policy H2 and new Policy DS4 (Part A to Part D) identify key infrastructure requirements for the SUEs and larger strategic sites. In addition, the IDP sets out the infrastructure required as well as details of costs, timing and funding options. This will be kept up to date in order to inform the master planning process and/or decision making.
155. **MM146** and **MM150** clarify that the IDP will be managed to reflect strategic cross-boundary infrastructure that will be delivered outside Coventry but will support the growth of the City as part of the DtC collaborative work. In addition, **MM147** would add clarity by setting out that category 1 'Essential Infrastructure' identified in the IDP and/or the Regulation 123 list would be the focus of developer contributions in order to support delivery of the Plan's growth. This would help to set out the Plan's priorities for contributions linked to delivery of the Plan strategy. In tandem with these changes, proposed changes to the IDP would identify category 1 infrastructure that would be necessary to enable development to proceed.

156. **MM145** and **MM149** change Policy IM1 and its supporting text to set out the most up-to-date position in respect of the Devolution Deal as part of the WMCA. Also, to set out that the IDP will be linked to the Monitoring Framework as an integral part of the evidence base to determining the need to review the Plan in accordance with Policy DS1.

Transport Infrastructure

157. The IDP identifies major highway infrastructure, including that required for delivery of the SUEs, as the highest priority for delivery. All known transport infrastructure to support the SUEs has been identified in the IDP, including an update regarding the Eastern Green and Keresley SUEs and some updated information around initial timescales for delivery, priority and costs⁵⁹. **MM31** and **MM119** ensure that highway infrastructure to support improved access to Whitley Business Park is identified as key to delivery of the Plan's objectives.
158. As outlined above, the CASM considered the impacts of proposed development in the Plan across the City having regard to localised pressure points and infrastructure options. During the examination, this work was developed further with specific regard to the Eastern Green and Keresley SUEs to define the quantum of development that could take place before the identified road infrastructure became essential⁶⁰. This was undertaken to inform the timing or phasing of such infrastructure. In addition, Policy AC3 sets out the need for Travel Assessments and Travel Plans. However, in recognition that assessments for the SUEs would require more detailed modelling of each site to determine the demand for new trips, the impact on existing networks and any required mitigation, the Council updated the CASM in order to define in greater detail the infrastructure required and the timing of its delivery. This information has also informed the update to the IDP, Policy H2 and the new proposed policies DS4 (Part A to Part D) on master planning principles.
159. The CASM estimates that planned LP growth will lead to an 18% increase in the number of trips made by all modes by 2034. Proposed developments on the outskirts of Coventry would predominantly use the car whilst development close to the City centre would lead to a greater proportion of trips being made by public transport, walking and cycling. It is anticipated that a higher proportion of new residents would travel out of Coventry to work in the future. This is due to there being a reduction in the number of jobs compared to workers, thus drawing workers to jobs outside the local authority area.
160. The CASM shows that the increase in traffic associated with the LP growth would lead to an increase in the distance travelled by car and delay experienced by car journeys across Coventry. Also, some of the spare capacity in the local highway network would be filled, particularly around the key development sites, the A45 and A46. This would result in up to a 37% increase in highway network delay for vehicles equating to up to 34 seconds and a reduction in average speed of 3KPH over the City as a whole. Junctions that would experience the most increase in delays would be on key routes in and around Coventry, particularly the A45 and around the M6. However, to

⁵⁹ Examination Document LP134

⁶⁰ Transport Modelling Update Report December 2016: Examination Document LP259

put this into perspective, only 3 junctions in the AM peak and 4 junctions in the PM peak would experience increased delays of over 1 minute 20 seconds. The CASM has assessed junctions to identify where pressures may occur in future. These would be further assessed when planning applications come forward to investigate the most appropriate mitigation, including delivery of any necessary infrastructure to ensure that the highway network continues to operate effectively.

161. The CASM did not include details of HS2 as the Council are currently awaiting traffic management plans and other information. The CASM takes account of known factors but in the absence of specific details in respect of the precise route alignment, HS2 could not be factored into the CASM at this stage. However, once these details are known the CASM can be updated. In the meantime, the situation will be monitored and any necessary infrastructure provision or mitigation could be facilitated through travel assessments and the monitoring framework. Any adjustments could be made to the Plan if necessary via a plan review. Proposed changes to the Plan via **MM118** and **MM121** would set out the most up-to-date position in the Plan, following the latest CASM work.
162. Whilst the Plan is clear about the need for new development sites to be well linked to existing networks, the Council agreed during the hearings that the Plan is not sufficiently clear in some cases, about the specific need to extend routes to serve the SUEs. Proposed changes to Policy AC3 and the supporting text would address this (**MM123**). The West Midlands Strategic Transport Plan sets out the overarching transport strategy for the area and the Plan's policies have regard to it. In particular, policies that support strategic connectivity such as rail, HS2 and rapid transit. However, **MM115** and **MM117** clearly identify this link as well as confirming the Plan's vision of a metropolitan tier with a metropolitan rail and rapid transit network and cycle network. The master plans would also provide opportunities to provide connectivity both within the sites and externally to neighbouring areas. They would be designed to maximise the use of public transport, including the provision of new and extension of existing services as well as walking and cycling.
163. The Plan's proposals for a rapid transit network align with the West Midland Strategic Transport Plan. There is ongoing work to refine the routes and phasing linked to the Devolution Deal as part of the new WMCA. Integration of the rapid transit network with new development would be considered through the master planning process which would help to inform the precise route alignments. As part of its joint working, the Council is working with Transport for the West Midlands (TfWM) - the transport arm of the WMCA - to ensure that development proposed in the Plan would be taken into account when planning future public transport and network requirements. **MM44** and **MM122** would set out how the Council is working with TfWM.
164. Provision for integrating the rapid transit route within the Eastern Green SUE would be made in the proposed new Policy DS4 (Part D). The policies in the Plan (as proposed to be amended) would provide an overarching framework with sufficient detail at this stage to guide more detailed master planning for the transport infrastructure required for the strategic sites and for links to surrounding areas. Amendments to the Plan are necessary to make reference

to Rapid Transit and bus as a means of transportation (**MM14**) whilst **MM15** would ensure that explicit reference to the provision of a high quality public transport network which integrates with walking and cycling routes is made within the Vision and Strategy objectives of the Plan.

165. Changes to Policy AC5 and the supporting text are required to emphasise this partnership approach and clarify how the Plan would support delivery of the Strategic Transport Plan's objectives, particularly in relation to providing quality bus services to new developments and how it would comply with the TfWM access standards (**MM114** and **MM125 to MM128**). Furthermore, whilst Policies AC1 and AC4 require new development proposals to incorporate new cycle routes and ensure that they are well linked to the existing cycle network, **MM116** and **MM124** would explain the role of the West Midlands Cycle Charter and include reference to the need for cycle parking at new sites and along the wider public transport network at transport interchanges and stations, such as Pool Meadow Bus Station, as appropriate.
166. In addition, **MM58** modifies Policy H3 to add a new criterion to say sustainable transport and supporting infrastructure in new housing schemes should be considered from the outset to improve access to public transport, cycling and walking. Changes to Policy DE1 regarding design would ensure that the integration of through routes for public transport and the incorporation of bus priority measures where appropriate would be considered for all development proposals (**MM106**). This would also be reflected in changes to Policy JE7 (**MM45**). These changes are considered necessary to ensure that the Plan is effective.

Modal Shift

167. The Council acknowledge that the Plan target for a 10% modal shift from single occupancy car use to more sustainable forms of travel will be challenging. However, it is considered to be realistic based on the anticipated level of investment in infrastructure as well as evidence of changing travel habits such as an increase in home working, walking and use of public transport. The NPPF aims to extend transport choice, reduce congestion and encourage the use of sustainable modes of transport. It expects this to be achieved through improving accessibility, promoting walking, cycling and use of public transport, promoting a mix of uses for larger scale developments to encourage shorter journey lengths for employment, education, shopping and leisure as well as improving traffic management and infrastructure⁶¹.
168. Whilst it would be unrealistic to expect traffic to flow unimpeded at peak times or to attempt to build sufficient road capacity to accommodate and prioritise the convenience of car users, the CASM assessed the impact of new development on the highway network on a worst case scenario based on current travel behaviour without the 10% modal shift target. The model showed that increases in traffic could generally be mitigated without it.
169. It is intended to measure progress in achieving the modal split via the monitoring framework (**MM151**⁶²). The monitoring framework would include indicators to measure impacts and mitigation measures of approved TAs and

⁶¹ NPPF paragraphs 29 to 32 and 34 to 38

⁶² Examination Document MOD.10

an assessment of the provision of transportation infrastructure. This would be used to update the IDP as well as inform investment priorities through S106/CIL. It would also inform updates to the CASM in order to identify any necessary remedial actions including review of the Plan where necessary. Updated information in the IDP would identify all development projected to come forward together with information on the infrastructure requirements. This would ensure that there is a benchmark for monitoring delivery of infrastructure which would be linked to the monitoring framework to provide additional clarity and ensure that the necessary infrastructure is delivered at the appropriate stage.

170. This approach would provide the Council with a delivery and funding implementation timetable which would inform the master planning process as well as ensure the funding is in place to enable the relevant infrastructure to be provided at the appropriate stage. Furthermore, it would provide a basis for the Council to monitor progress by setting out a programme and key progression points for the critical infrastructure and to identify what action would be taken if the delivery of infrastructure fails to progress as expected.

171. **MM12** emphasises the need to balance the needs of public transport, cycling and walking in the key issues and opportunities table.

Air Quality

172. The whole of Coventry is designated as an Air Quality Management Area (AQMA). The Plan acknowledges that emissions from road transport are the major source of pollution in the area, with emissions from industry also having a negative impact on air quality. The Plan sets out how the Council is working together with its West Midlands neighbours – as a partner of the Low Emissions Towns and Cities programme – to reduce emissions from road transport.

173. Changes to the supporting text of Policy EM6 would clarify that the West Midlands Metropolitan Transport Emissions Framework (WMMTEF) and its associated policies set out transport's role in tackling air quality issues (**MM138**). In addition, changes to Policy EM6 would make clear that major development proposals should be in accordance with the WMMTEF and associated policies (**MM138**). These changes are necessary to ensure that the policy is effective. Policy EM6 'Air Quality' would change to Policy EM7 as a result of a new policy EM6 'Redevelopment of Previously Development Land' being included in the Plan (referred to in more detail below).

174. The AQMA would be monitored and an indicator would be included in the monitoring framework via **MM151**⁶³ to monitor background and peak levels of air quality to seek an improvement with a view to removing parts of the City from the AQMA status. In addition, the provision of new air quality monitoring stations is identified in the IDP as necessary new infrastructure.

Conclusion on Issue 5

175. The Council has undertaken a thorough and robust assessment of the transport implications of development in the Plan and is satisfied that the

⁶³ Examination Document MOD.10

effects of the strategic sites and allocations on traffic and transport can be adequately mitigated. The Plan will provide effectively for delivery of development, including any necessary supporting infrastructure. There would be sufficient scope to review transport, infrastructure and mitigation measures as the development of the strategic sites progress to ensure that the transport network is accessible and opportunities are taken to improve connectivity.

Issue 6 – Does the Local Plan make adequate and appropriate provisions to meet employment development needs?

176. Coventry's economic base has shifted from a predominance of manufacturing over recent decades. Today the majority of jobs are in healthcare and education. These trends have meant changing needs in terms of employment land and premises. The growth in employment and diversification is predicted to continue throughout the Plan period. The Council's employment land review⁶⁴ has considered recent take up rates based on annualised averages and actual completions. It has also had regard to projected employment growth, market signals and the City's relationship to employment land on its boundary. It recommends that there is a gross employment land requirement of around 215 ha over the Plan period, which includes a 58 ha 5 year supply margin. In terms of the Coventry and Warwickshire LEP area, the recent employment land use study conducted for the wider area recommends that between 500 and 660 ha of employment land is required up to 2031.
177. Approximately 64 ha of employment land in Coventry is identified in the SHLAA as potentially suitable for housing, whilst since the start of the Plan period around 90 ha of employment land has been granted planning permission or developed for employment uses. Thus when considering employment growth needs as a whole, adding this additional 154 ha to the 215 ha identified, the City's employment land requirement is 369 ha. There is thus an identified shortfall. This is planned to be provided within Coventry and also in Warwickshire but adjacent to the City boundary - principally at Ansty Park, Ryton Park and Coventry Gateway which are being actively promoted by neighbouring Councils. The proposed redistribution has been agreed as part of the Coventry and Warwickshire Employment Land MOU⁶⁵. **MM22** would set out the land supply position and agreed redistribution across the sub-region more clearly.
178. Coventry's employment land supply is approximately 146.5 ha within or immediately adjacent to the City boundary. However, if recent completions are taken into account this figure falls to approximately 101 ha. With signs of strong growth in the demand for new employment land around Coventry and Warwickshire, the Council's evidence base points to the need to boost supply in the medium to longer term. Immediate supply within the area is identified as being sufficient but longer term supply is flagged as being problematic due to a reliance on a number of large sites and constraints imposed by Green Belt policy. As such, the Council seeks to allocate additional land for employment development within the Green Belt as well as supporting its Warwickshire

⁶⁴ G L Hearn Employment Land Review 2015: Examination Document LP30

⁶⁵ Coventry & Warwickshire Employment Land MOU: Examination Document LP209

neighbours' intentions to allocate additional sites adjacent to the City boundary within the wider Green Belt.

179. Policy JE2 sets out the provision of employment land and premises for the Plan period including a rolling land supply of 58 ha. Proposed main modifications to the policy and its reasoned justification – including the table which provides a breakdown of the components of employment land supply – are necessary in the interests of clarity (**MM39** to **MM43**). The proposed employment land provisions set out in Policy JE2 (as proposed to be amended) would meet identified needs throughout the Plan period. This includes quality office space, start up premises, grow-on space for planned expansions as well as land supply for B2 and B8 Use Class development.
180. In order to ensure that the Plan refers to the strongest employment growth sectors **MM35** and **MM36** amend the supporting text of Policy JE1. This is necessary to ensure that the Plan reflects the latest position in the evidence base as the sectors listed in the submitted Plan reflect an earlier draft of the employment study. In addition, **MM38** refers to the importance of supporting the two Universities. Proposed changes to the Vision and Strategy objectives of the Plan would ensure that reference is made to support for the Universities and their importance as engines for research, innovation and culture in the City (**MM13**). These changes would ensure that the Plan is effective by making explicit reference to the recognition of the role the Universities have as drivers of job creation and the LP and AAP's roles in supporting and facilitating their continued growth and expansion.
181. Ongoing monitoring of the delivery of employment land and premises within and adjacent to Coventry will be monitored on an annual basis through the Council's AMR process as well as forming part of the sub-regional monitoring programme to support the employment land MOU and delivery of the CWLEP's Strategic Economic Plan. Furthermore, changes to Policy DS1 (**MM27**) would ensure that a failure to provide the necessary employment land would result in a need to review the policy and identify additional sites to ensure that adequate land was available to support the identified economic growth.
182. The evidence suggests that the supply of employment land would be aligned to economic and labour market forecasts and takes into account Coventry's population projections, economic activity, unemployment rates and commuting patterns. The Plan provides for an appropriate geographical correlation between the distribution of employment and housing. Overall, it would provide for an appropriate level of growth in the context of the wider C&W LEP area and would be sufficiently flexible to accommodate the level and type of growth forecast. The Plan's approach is thus considered sound.
183. The automotive manufacturing sector is heavily influenced by the operations of a few key companies – particularly Jaguar Land Rover (JLR). The sector has seen strong performance and jobs growth in recent years. The Council recognises the importance of JLR to the economy of the City, the sub-region and nationally and fully supports its continued future growth and expansion both within and adjacent to Coventry. A separate policy to support this growth is not necessary, given that the JLR sites in Coventry are in areas where the Plan already proposes employment based development or links to land outside Coventry. Land around the Whitley Business Park, where JLR is

based, is included for allocation in Policy JE2 as well as land to the south east which is allocated for an extension to the existing operations.

184. Furthermore, the Plan makes provision for removal of land for the Gateway/Whitley South development proposals from the Green Belt (JE2:4). This could facilitate further expansion opportunities for JLR. New policy DS4 (Part B) would support joint working with WDC as well as positive consideration of the ecology and biodiversity issues associated with the site. For the reasons outlined above, and my wider conclusions in relation to the need to accommodate the anticipated growth and the limited opportunities for development elsewhere in the area given the City's tight administrative boundaries, there are exceptional circumstances which justify altering the boundaries of the Green Belt to accommodate the planned development and allocate the site at Gateway/Whitley South.
185. Taken together, the Plan's policies and proposals would clearly support the future expansion of JLR. However, in order to emphasise the strategic importance of JLR to the City, modifications to the Plan to include additional text to the introductory section of chapter 3 (**MM3** and **MM21**) as well as additional reference in Policy JE1 (**MM37**) and Policy DS2 (**MM30**) are necessary. In addition, new Policy DS4 (Part B) would relate directly to master planning at the Whitley employment hub site, and refer explicitly to the future expansion of JLR (**MM31**). Changes to the supporting text of Policy JE2 (**MM39**) would also make reference to the growth aspirations of JLR in relation to Whitley South (within Warwick District). I consider these changes to be necessary in the interests of clarity and to ensure that the Plan is effective.

Conclusion on Issue 6

186. In conclusion, subject to the MMs identified as necessary for soundness, the Plan provides adequate and appropriate provision to meet the identified need for employment land and sufficient flexibility to support employment generating development proposals.

Issue 7 –Does the Local Plan make appropriate provision for retail, leisure, tourism and related uses? Are the Local Plan's policies for the hierarchy of retail centres positively-prepared, justified and effective?

187. The Council's retail strategy is underpinned by a number of studies including the City Wide Shopping and Centres study⁶⁶ which used data from Experian as well as primary research around shopper trends and habits in the area and a review of the retail based catchment area. The study factored in allowances for growth in market share, linked to planned improvements in the City centre as well as an allowance for e-retailing which recognises the growth in market share for internet shopping but includes the need for retail floor space with links to click and collect services.
188. It considered projections for retail needs linked to both a constrained level of housing growth and the total population growth projected for the City up to 2031. This approach reflects the joint Coventry and Warwickshire SHMA work. Through consultation and its on-going DtC work, the Council has

⁶⁶ Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

planned for the total level of retail need to meet the City's full projected population growth to 2031. This is to reflect the City centre's position as a sub-regional centre together with its accessibility and its aspirations in terms of several key regeneration schemes, such as Friargate.

189. A total of 106,834 sq m of gross retail floor space has been identified as the requirement over the Plan period. Tables 5.1 and 5.2 of the Plan set out this total retail need, broken down by type. Amendments to these tables are necessary to update these figures and set out in a footnote that an allowance has been made in the short term projection for at least 10,000 sq m of new retail floor space at City Centre south (**MM74** and **MM75**). I return to this below. Changes to Table 5.2 would provide additional clarity by setting out the total retail need broken down into periods – to 2021, 2021-2031 and the Plan period from 2011 to 2031 (**MM75**).
190. The NPPF advises that local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes⁶⁷. Coventry City centre sits at the top of the Council's centres hierarchy as the main focus for comparison shopping as well as employment, leisure and entertainment. It is clear from the evidence that it is necessary to ensure that the City centre is regenerated and revitalised in order to maximise its City-wide catchment, compete with surrounding areas and support the City as a whole. Alongside the Local Plan, the Council's Area Action Plan (AAP) contains specific policies which focus on the City centre. The Primary Shopping Area is designated through the AAP.
191. The hierarchy is set out in LP Policy R3 which identifies Major District Centres (MDCs), District Centres (DCs) and Local Centres (LCs) which sit below the City centre. The Council's Local Centres Assessment⁶⁸ has considered the management of the hierarchy as a whole to ensure that it supports rather than competes with the City centre. This is set out in the Plan. The Council's evidence recognises that retail and the role of town centres are changing and that there is a need for centres to diversify and bring in a greater level of leisure, tourism and entertainment uses. In view of this, the retail strategy aims to maximise flexibility in terms of how retail space is allocated. Rather than specifying A1 uses and risking higher vacancy rates, retail need has been grouped within a broader use class range (A1 – A5) to ensure that floor space is flexible and can adapt to market needs quickly.
192. Table 5.3 sets out how the overall retail needs will be met over the Plan period by setting out the components of the supply including existing commitments and allocations. Amendments to this table to provide a breakdown of convenience, comparison (A1) and other retail (A2 – A5) provision (**MM76**) provide the necessary clarity in terms of how the needs for both comparison and convenience retail floor space would be met. In addition, the figures in this table would be updated to reflect the most up-to-date position since the study was undertaken in terms of completions, sites with planning permission and sites under construction.
193. Proposed changes to Policy DS1 (**MM24** and **MM26**) would set out the level of retail based floor space across use classes A1 to A5 that would be required

⁶⁷ National Planning Policy Framework paragraph 23

⁶⁸ Local Centres Assessment (2015) Examination Document LP60

over the Plan period whilst the addition of the word "based" after "retail" in Policy R1 would clarify that whilst retail provisions are the basis of the policy and floor space allocations, other supporting uses (within A1 - A5) would be acceptable in principle. This would provide additional flexibility within the policy to support the Plan's objective of providing a comprehensive portfolio of retail floor space and to reflect permitted development rights. It would also set out clearly the level of gross convenience floor space needed to 2031 and that at least 70,000 sq m would be allocated in the City centre.

194. A greater proportion of floor space is proposed to be allocated in the City centre – over and above the initial projections in the Shopping and Centres Study. This reflects the Plan's retail strategy to ensure that the City centre remains the focal point for new retail based investment and to support its role at the top of the hierarchy capitalising on its City-wide catchment and accessibility. It would also support the Council's regeneration objectives by focusing investment in the centre in order to benefit the City as a whole and to ensure that its role within the sub-region is not undermined. The study identifies that additional floor space could help to increase market share in the City by attracting greater footfall and opportunities to make qualitative improvements in the retail offer to meet changing demands.
195. There is adequate evidence that sufficient new retail floor space could be delivered within the City centre when developments with extant planning permission and other commitments in the area are taken into consideration. Furthermore, the proposed allocations for retail uses in other centres within the hierarchy would enable opportunities to support and complement rather than compete with the City centre. In order to be sufficiently flexible, changes to the supporting text of Policy R1 are necessary to make clear that if it is not possible to provide new retail opportunities within the Primary Shopping Area or wider City centre through the sequential assessment process then the focus should be on the other centres within the hierarchy as appropriate (**MM73**).
196. The Council's retail study⁶⁹ identified a floor space requirement of 17,667 sq m for comparison goods for the City centre. However, this requirement includes an uplift of 10,000 sq m to take into account the City Centre South scheme which was included as an existing commitment. The projections in the retail study thus identified retail floor space needs over and above that to be provided at City Centre South. Distinguishing this allowance from the rest of the identified requirement reflects that the scheme is a central element to the delivery of the City's retail strategy and will ensure that the contribution from this development will not be double counted when the Council allocate provisions against the overall need.
197. The retail study identifies a need for approximately 21,800 sq m retail warehouse floor space over the Plan period. It says that additional floor space should be accommodated within the designated centres where possible but the study also highlights the opportunities to focus retail warehouse demand towards the City centre. In line with the sequential approach in the NPPF, the Plan seeks to focus retail warehousing and the types of users that occupy

⁶⁹ Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

these units within the City. This would also provide a potential opportunity to promote the Council's wider regeneration objectives. However, changes to table 5.1 are required to more accurately show the total warehouse need as a requirement across the City centre and rest of the City (**MM74**).

198. Policy R1 seeks to restrict further retail development at Arena Park Major District Centre (APMDC) unless it can be shown that it will not directly impact on the City centre. The retail study identifies it as having a large volume of retail floor space which, if expanded further, could compete with rather than complement the City centre. It is understood that the APMDC is fully occupied and trading well. However, there are limited opportunities to extend it with the only vacant land nearby already benefiting from planning permission for leisure uses. Nonetheless, I agree that further retail expansion of this centre would have the potential to adversely affect the City centre.
199. In order to align with the NPPF, **MM77** changes Policy R1 by replacing the words "impact" with "significant adverse impact". This will also ensure that the Plan is clear that any expansion proposals would need to be accompanied by robust evidence that it would not harm the vitality and viability of the City centre. Each of the centres will be monitored in terms of their performance and position within the hierarchy to ensure that any emerging issues can be identified and that the Plan's policies are appropriate in terms of helping to reduce vacancy rates and meet local and wider- catchment needs.
200. Policy R3 sets out the network of centres that comprise the retail hierarchy. However, some changes put forward by the Council are necessary to ensure that it is sufficiently flexible to enable identified retail needs to be met across the hierarchy. The policy is clear that the centres would be the preferred locations for new retail development and other town centre and community uses that do not serve a City-wide catchment. As submitted, the policy wording would contradict the statement that these centres in the hierarchy are the preferred locations to support the City centre. The deletion of the words "and are not more appropriately sited in the City centre" (**MM81**) is necessary in order to ensure that the policy is not overly restrictive.
201. Policy R3 seeks to support development in MDCs and DCs provided that it does not impact negatively on the City centre and will support the needs of their area of the City within a specified radius area – 3 km for MDCs, 2 km for DCs and 1 km for LCs. However, the Council agreed that the specified radii had not been justified by any detailed evidence to show that it would be necessary to adhere to these distances in order to ensure that they would not compete with the City centre. As such the requirement would be unduly onerous and serve little purpose. The deletion of these stipulated distances through **MM82** is thus necessary.
202. The NPPF requires a sequential assessment for all main town centre proposals outside of a designated centre and sets a threshold of 2,500 sq m for impact assessments, unless lower thresholds can be supported by appropriate evidence having regard to local circumstances. The Plan identifies the average unit size across all centres as being less than 400 sq m (for accuracy these figures have been updated via **MM78**). Policy R4 requires an impact test for proposals that exceed 400 sq m on the basis that the existing designated centres comprise predominantly of smaller units.

203. However, there is no substantive evidence to suggest that allowing proposals of 400 sq m would have a significant adverse effect on the role of the City centre or that impact assessments for proposals of this scale would be justified. During the examination the Council undertook its own analysis which showed that recent out of centre proposals range in size between 120 sq m to 1700 sq m, whilst the out of centre retail parks contain units which average around 900 sq m – 1200 sq m. The Council thus proposed to increase the thresholds for impact tests from 400 sq m to 1000 sq m. This is on the basis of the average unit size of the City's out of centre retail parks which would be the most likely focus for out of centre proposals.
204. PPG says that in setting a locally appropriate threshold it will be important to consider a number of factors, including the scale of proposals relative to town centres, existing vitality and viability of town centres, the impact on planned investment and the likely effects on any town centre strategy⁷⁰. In this context the Council has considered the impact of a scale lower than the default threshold in the NPPF but a level which is considered to be more aligned to the average unit size across the City. This would allow for proper consideration of the potential impacts on the vitality and viability of the City centre. Thus whilst the proposed threshold is below than that set out in the NPPF, the Council has had regard to local circumstances. I consider that, based on the evidence, this threshold would be appropriate in order to ensure that the Plan's town centre strategy is not undermined (**MM83**). Policy R4 would also allow for sufficient flexibility by stating that catchment areas for sequential and impact tests would be considered on a case by case basis.
205. Policy R4 requires the sequential assessment to include vacant units within the out of centre retail warehouse parks and local shopping parades. However, this requirement would not accord with the approach set out in the NPPF and may affect the delivery of sufficient retail floor space to meet the Plan's identified need by being unduly onerous and inflexible. **MM84 to MM87** rectify this conflict.

Conclusion on Issue 7

206. The Plan makes appropriate provision for retail, leisure, tourism and related uses and subject to the MMs necessary for soundness, the Plans policies for its network of centres are positively-prepared, justified and effective.

Issue 8 – Whether the policies for the Natural and Historic Environment, green space, the mitigation of flood risk and adaptation to climate change are justified and effective?

207. Policy GE1 seeks to maintain a strategic network of green and blue spaces such as woodlands, parks, ponds, canals and rivers and the links between them. Proposed changes to Policies GE1 and R2 to include specific measures to encourage the retention or reinstatement of tributaries or culverts where appropriate would strengthen support for their retention (**MM80** and **MM98**). **MM98** would strengthen support for the maintenance and enhancement of existing green infrastructure through specific reference to improving and maintaining connectivity, accessibility, biodiversity, flood risk management

⁷⁰ Planning Policy Guidance Paragraph: 016 Reference ID: 2b-016-20140306

and integrating proposals where possible to further improve green infrastructure.

208. The Council has adopted a Green Space Strategy which sets out minimum local standards for green space provision. Policy GE2 seeks to ensure that development would not create a deficiency of green space and sets out criteria that would need to be met if development would lead to its loss. Changes to add the word 'or' after each criterion (**MM99**) are necessary to add clarity to the policy and to ensure that it would be effective.
209. Policy GE3 seeks to ensure that any negative effects on biodiversity through development would be avoided or adequately mitigated where necessary. **MM100** and **MM104** would add a new criterion stating that development proposals should ensure that legally protected species and those covered by national, regional or local Biodiversity Plans are preserved. **MM101** sets out that biodiversity offsetting would be considered only in exceptional circumstances and **MM102** sets out that ancient and newly planted woodlands and heritage assets will be protected. A cross reference to Policy HE2 is necessary to clarify that all practical measures must be taken to assess and record archaeological remains.
210. Policy GE4 relates to tree protection. **MM105** clarifies that any unacceptable loss of trees or woodlands would be mitigated through their replacement with new trees as part of a well-designed landscape scheme.
211. Policy HE2 relates to conservation and heritage assets. **MM109** changes the wording of the policy to substitute the word 'conserve' with 'preserve' and to the supporting text (**MM107**) would ensure that the policy is consistent with the NPPF and the statutory test⁷¹. In addition, **MM110** would add other categories to buildings most associated with the City's industrial heritage. Further changes to the supporting text via **MM108** would provide the most accurate number of buildings which have been selected for local listing.
212. Policy HE3 relates to the creation of a proposed new City Heritage Park in the grounds of the Charterhouse. **MM111** and **MM112** change the policy wording and supporting text to convey the importance of developing a master plan to support delivery of the Heritage Park, the expansion/reconfiguration of the school sports grounds, naturalisation of the river valley and enhancement of the setting of the Charterhouse and surrounding area. These changes are necessary to provide sufficient clarity and to ensure that the policy is effective.
213. Policy EM1 relates to planning for climate change adaptation. Changes to the policy to refer to the need to seek opportunities to develop new blue infrastructure as appropriate (**MM129**), are necessary to improve its effectiveness. Submitted policies EM2 and DS3 require modification (**MM29b** and **MM130**) for consistency with national planning policy⁷² to ensure that they do not set any specific standards for residential development, beyond those within the Building Regulations.

⁷¹ Planning (Listed Buildings and Conservation Areas) Act 1990

⁷² Written Ministerial Statement: Planning Update dated 25 March 2015

214. Policy EM3 relates to renewable energy generation. The supporting text says that around 90% of Coventry is unsuitable for wind turbines due to insufficient wind speeds and the density of development. This is supported by a local wind mapping study. A further Written Ministerial Statement dated 18 June 2015 sets out considerations to be applied to wind energy development. It is thus necessary to amend the supporting text to clarify that the policy does not apply to wind energy developments, which will be considered against national policy and guidance (**MM132**). This change is necessary for consistency with national policy.
215. **MM133** and **MM134** make substantial amendments to policy EM4 and the supporting text in light from advice from the Environment Agency. The changes, which take appropriate account of viability considerations, are necessary to ensure the policy is effective in managing flood risk and protecting and enhancing water resources in a manner consistent with national policy.
216. In addition, proposed changes to Policy EM5 and the supporting text following advice from the Environment Agency are necessary to ensure that the policy is clear that all development must address flood risk from new developments, apply sustainable drainage systems (SDS) and should ensure that surface water runoff is managed as close to its source as possible (**MM135** and **MM136**). These changes, together with some consequential amendments to the supporting text are necessary to ensure that the policy is effective.
217. Further advice from the Environment Agency led the Council to propose a new policy during the examination. This would ensure that the Plan includes appropriate measures to address any potential risk to groundwater through the redevelopment of previously developed land. New policy EM6 and its supporting text (**MM137**) would also ensure that the Plan reflects the most recent published information in support of the Severn River Basin management plan. In addition, it would include measures to protect valuable water resource assets in Coventry that are deteriorating. These changes would also ensure that the Plan is effective.

Conclusion on Issue 8

218. Subject to these necessary modifications to ensure their effectiveness, the Plan contains sound policies to protect and manage the natural and historic environment, green infrastructure, open space as well as to mitigate against flood risk and adapt to climate change.

Issue 9 – Is the Local Plan's approach to Minerals and Waste planning justified, effective and consistent with national planning policy?

Waste

219. Policy EM7 reflects national planning policy in the NPPF as well as the Council's Waste Management Strategy in seeking to reduce the amount of waste sent to landfill. Around 92% of municipal solid waste in Coventry is incinerated in an Energy from Waste facility with the remainder going to landfill. The Plan recognises that the planned new growth will lead to a rise in all waste production and that recycling levels will need to be maintained and

increased throughout the Plan period in line with the Council's Waste Management Strategy. However, existing waste treatment facilities have been located in older industrial areas. The regeneration of these areas may mean that they are no longer compatible with new, more modern treatment facilities. As such, the Plan seeks to ensure that existing waste treatment facilities should be improved where necessary and safeguarded.

220. **MM140** is necessary to ensure that existing waste management facilities or land allocated for such uses would be protected from encroachment from incompatible land uses that are more sensitive to odour, noise, dust and other impacts. **MM140** would also make clear that waste management facilities would only be permitted where they would not have an unacceptable impact on surface or groundwater resources. This modification followed from advice from the Environment Agency and is necessary to help protect valuable water assets. Modifications are also required to delete the repetition of criterion d) and the re-numbering of the policy from EM7 to EM8 due to the insertion of new policy EM6 as outlined above (**MM139** and **MM142**).

Minerals

221. The NPPF requires Minerals Planning Authorities [MPAs], of which the City Council is one, to prepare an individual or joint Local Aggregate Assessment [LAA], the primary purpose of which is to assess requirements for and supply of minerals in the LAA area. Local Plans should define Minerals Safeguarding Areas [MSAs] so that specific minerals resources of local or national importance are not sterilised by other development, and include policies for the extraction of those resources. The NPPF also places emphasis on the use of secondary or recycled minerals in preference to primary extraction.
222. The West Midlands local authorities have a joint partnership arrangement to manage aggregate supply. The Local Aggregate Assessment 2016⁷³ sets out the aggregate supply over the Plan period. The 2009 sub national guidelines suggest that 165 million tonnes of sand and gravel and 82 tonnes of crushed rock will be required in the former West Midlands region from 2005 to 2020. The Aggregate Working Party Secretariat produced an indicative set of apportionments based on previous trends in sales. The proposed apportionment was 0.55 million tonnes of sand and gravel per year with no apportionment of crushed rock as there are no viable resources remaining.
223. There is limited potential for a land-won supply of aggregates from the West Midlands area. However, there is currently a land-bank of over 9 years' supply⁷⁴, well above the required figure to provide a 7 year land bank, and this has been identified as the requirement in the Plan. There are sufficient reserves of sand and gravel to enable production to continue at the level of past apportionments but no realistic prospect of increasing it in view of the constraints to mineral extraction in the area. Recycled aggregates also make an important contribution to the supply but it is unlikely that this will increase significantly over the Plan period. Nonetheless, proposed changes to the supporting text of Policy EM9 (previously EM8) are necessary to make clear that the Council will continue to work collaboratively with its neighbours to assess future supply options (**MM143**).

⁷³ Examination Document LP89

⁷⁴ Coventry City Council Statement to Hearing Session 11: Examination Document LP212

224. Mineral Safeguarding Areas (MSAs) were identified using British Geological Survey maps and industry sources and are defined on the Policies Map. Whilst the minerals resources identified in Coventry are unlikely to be worked during the Plan period, the processing of secondary and recycled aggregate material does occur. Policy EM9 thus delineates MSAs and establishing the need for safeguarding important minerals such as sand and gravel. In addition, the Council propose a new Policy EM10 to ensure that non mineral development in MSAs would not sterilise any potential future mineral extraction should this become viable and appropriate (**MM144**). It would also ensure that development proposals in MSAs would be evaluated in partnership with the Coal Authority to assess any impact from past mining.
225. The Council propose a modification to the Policies Map in order to rectify a cartographical error which omits part of the Sowe Valley from the MSA.
226. Following advice from the Coal Authority, **MM131** is necessary in order to identify the potential risks to development from past coal mining legacy in respect of unstable land.

Conclusion on Issue 9

227. Subject to the MMs identified as necessary for soundness, the Plan's policies for waste and minerals are justified and effective.

Issue 10 – Does the Plan set out effective arrangements for implementing and monitoring the achievement of its policies and proposals?

228. The Monitoring Framework sets out a series of indicators against which implementation of its policies and proposals will be measured. **MM151**⁷⁵ amends a number of these and adds new ones to ensure that monitoring will be effective. In particular, these additions include monitoring indicators for delivery of the Plan's key growth targets for housing, key infrastructure, employment land, offices and retail. The modifications include monitoring indicators to measure patronage of public transport and changes in modal share as well as the development of greenfield sites and land which had previously been designated as Green Belt.
229. The proposed amendments also relate to measuring delivery of planned housing and employment growth outside the City that is required to meet the shortfall in Coventry. Furthermore, the Monitoring Framework specifies the measures that will be taken, including early review of the Plan, in accordance with new Policy DS1 if monitoring reveals that the necessary progress is not being made.

Conclusion on Issue 10

230. I conclude that, subject to the necessary modifications, the Monitoring Framework sets out effective arrangements for implementing and monitoring the achievement of the Plan's policies and objectives.

Assessment of Legal Compliance

⁷⁵ Examination Document MOD.10

231. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan has been prepared in accordance with the Council's LDS 2015.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2012. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report January 2016 sets out why AA is not necessary. Natural England supports this.
National Policy	The Local Plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

232. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

233. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Coventry Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

R. Phillips

Inspector

This report is accompanied by an Appendix containing the Main Modifications.



Report to Coventry City Council

by Rebecca Phillips BA(Hons) MSc DipM MRTPI MCIM

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 7 November 2017

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Coventry City Centre Area Action Plan 2011 - 2031

The Plan was submitted for examination on 1 April 2016

The examination hearing was held on 20 October 2016

File Ref: PINS/U4610/429/7

Abbreviations used in this report

AA	Appropriate Assessment
AAP	Coventry City Centre Area Action Plan
DtC	Duty to Co-operate
HER	Historic Environment Record
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
APP/MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHMA	Strategic Housing Market Assessment
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Coventry City Centre Area Action Plan provides an appropriate basis for the planning of the City centre provided that a number of main modifications [MMs] are made to it. Coventry City Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearing. Following the hearing, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- To ensure that the levels of housing, employment, offices and retail development to be provided over the period of the AAP are accurately identified and that the means to deliver the required development is clear;
- To ensure that there are effective policies to protect the historic and natural environment and open spaces;
- To ensure that there are effective policies to deal with flood risk and adaptation to climate change;
- To identify accurately the necessary transport and public realm improvements;
- To ensure that the AAP's policies are justified, effective and compliant with national policy; and
- To ensure that the policies provide a sound monitoring framework for the AAP.

Introduction

1. This report contains my assessment of the Coventry City Centre Area Action Plan (AAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The AAP, submitted in April 2016 is the basis for my examination. It is the same document as was published for consultation in February 2015.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearing, are necessary. The MMs are referenced in bold in the report in the form **AAP/MM1, AAP/MM2, AAP/MM3** etc. and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Assessment of Duty to Co-operate

5. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
6. The AAP was submitted together with the Local Plan for examination. I deal with the assessment of the Duty to Co-operate (DtC) in my report into the soundness of the Local Plan.
7. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

8. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearing I have identified four main issues upon which the soundness of the Plan depends. Under these

headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Whether the policies for the mitigation of flood risk and adaptation to climate change and the preservation of the Historic Environment are justified and effective?

Flood Risk Mitigation and Climate Change Adaptation

9. The AAP acknowledges the cultural and historic importance of the River Sherbourne to Coventry City centre. The braided sections of the River Sherbourne and its tributaries were culverted to make way for roads and buildings. The AAP seeks to explore opportunities to de-culvert lengths of it as part of wider regeneration aspirations in the City centre. The Environment Agency (EA) says that the river is currently classed as having poor ecological status but the aspiration is that it should improve to meet good ecological status by 2027.
10. Further to the EA's advice, the Council proposes to add an additional criterion to Policy CC1 to emphasise the importance of supporting the reintroduction of green and blue infrastructure throughout the City centre and opportunities for de-culverting wherever possible (**AAP/MM12**). This is necessary to ensure that opportunities are taken to improve the River Sherbourne to support it meeting the target of good ecological potential.
11. In addition, changes to Policies CC8 and CC25 and the supporting text (**AAP/MM23**, **AAP/MM24** and **AAP/MM54**) would set out clearly that opportunities to de-culvert or "daylight" and restore the River Sherbourne and its tributaries would be supported in principle and that doing so would meet the objectives of the Severn River Basin Management Plan.
12. Further to advice from the EA, changes to Policy CC9 are necessary to emphasise that for new development, opportunities to reflect the alignment of the River Sherbourne and its tributaries should be taken (**APP/MM28**). Also, where development proposals lie adjacent to the existing de-culverted River Sherbourne that a natural sinuous river channel should be retained and that consideration should be given to removing water bodies from culverts where appropriate. This will be vital to create multi-functional green and blue spaces within the City centre (**APP/MM30**).
13. A cross reference in Policy CC9 to Policy EM5 of the Local Plan is necessary to ensure that there is a comprehensive policy framework within which to ensure that Sustainable Drainage Systems are put in place where appropriate to properly manage surface water runoff in new development (**APP/MM29**).

Historic Environment

14. Policy CC2 relates to conservation and heritage assets. **APP/MM21** changes the wording of the policy to substitute the word 'and' with 'or' would ensure that the policy is consistent with the NPPF and the statutory test¹. In addition, **APP/MM20** would provide additional supporting text, on the advice of Historic

¹ Planning (Listed Buildings and Conservation Areas) Act 1990

England, to emphasise the Council's commitment to work together with Historic England to undertake further research into the City's post-war buildings, spaces and places in order to ensure that the significance of the historic environment is appreciated and its potential is harnessed and integrated into aspirations for regenerating the City centre. This is necessary to ensure that the Plan's policies are effective.

15. This would be further supported via **APP/MM47** which would clarify in the supporting text to Policy CC14 that development proposals in the area adjoining the Civic area, in particular the historic Cathedral area to the north and primary retail area to the west, would need to give specific consideration to the Council's evolving HER to reflect the heritage and conservation value of the area.
16. **APP/MM20** would also express the Council's commitment to update its local list and continue to identify heritage assets of local importance as well as support for the centre's Heritage Action Zone status. Changes to Table 17a are necessary to ensure that the map showing the heritage assets within the PSA is accurate and includes the most up-to-date designations (**APP/MM52**). These changes are necessary to ensure that the Plan's policies are effective.
17. **APP/MM22** is necessary to ensure that the map of City centre heritage assets is correct and reflects the most up-to-date position.

Conclusion on Issue 1

18. Subject to the necessary modifications outlined above, the AAP contains sound policies to preserve the historic environment as well as to mitigate against flood risk and adapt to climate change.

Issue 2 – Whether the City Centre Area Action Plan makes appropriate provision for retail development in the City centre and whether its retail policies are justified and effective?

19. As outlined in my report into the soundness of the LP, the Council's retail strategy is underpinned by a number of studies including the City Wide Shopping and Centres study² which used data from Experian as well as primary research around shopper trends and habits in the area and a review of the retail based catchment area. The study factored in allowances for growth in market share, linked to planned improvements in the City centre as well as an allowance for e-retailing which recognises the growth in market share for internet shopping but includes the need for retail floor space with links to click and collect services.
20. It considered projections for retail needs linked to both a constrained level of housing growth and the total population growth projected for the City up to 2031. This approach reflects the joint Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) work. Through consultation and its on-going DtC work, the Council has planned for the total level of retail need to meet the City's full projected population growth to 2031. This is to reflect the City centre's position as a sub-regional centre together with its accessibility

² Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

and its aspirations in terms of several key regeneration schemes, such as Friargate.

21. A total of 106,834 sq m of gross retail floor space has been identified as the total requirement within the wider Coventry area over the Plan period. LP Policy R1 sets out that allocations within the City centre would support the provision of at least 70,100 sq m of retail A1 – A5 use. **APP/MM13** clarifies this and sets out the correct figures in the AAP.
22. Table 3 of the AAP sets out this total retail need in the City centre, broken down by type. Amendments to the table are necessary to provide a breakdown of convenience, comparison (A1) and other retail (A2 – A5) provision to provide the necessary clarity. The changes would also set out in a footnote that an allowance has been made in the short term projection for at least 10,000 sq m of new retail floor space at City Centre south. I return to this below. The changes to Table 3 of the AAP are set out in **APP/MM14**. The amended table would also provide additional clarity by setting out the total retail need broken down into periods – to 2021, 2021-2031 and the Plan period from 2011to 2031.
23. Table 4 of the AAP sets out the overall retail needs in Coventry from 2014 to 2031. However, for clarity, it is proposed to delete this table and incorporate a more comprehensive breakdown of retail needs over the Plan period within the adjusted Table 3 (**APP/MM50**).
24. The NPPF advises that local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes³. Coventry City centre sits at the top of the Council's centres hierarchy as the main focus for comparison shopping as well as employment, leisure and entertainment. It is clear from the evidence that it is necessary to ensure that the City centre is regenerated and revitalised in order to maximise its City-wide catchment, compete with surrounding areas and support the City as a whole. Alongside the LP, the AAP contains specific policies which focus on the City centre. The Primary Shopping Area (PSA) is designated through the AAP.
25. The hierarchy is set out in LP Policy R3 which identifies Major District Centres (MDCs), District Centres (DCs) and Local Centres (LCs) which sit below the City centre. The Council's Local Centres Assessment⁴ has considered the management of the hierarchy as a whole to ensure that it supports rather than competes with the City centre. This is set out in both the LP and the AAP.
26. The Council's evidence recognises that retail and the role of town centres are changing and that there is a need for centres to diversify and bring in a greater level of leisure, tourism and entertainment uses. In view of this, the retail strategy aims to maximise flexibility in terms of how retail space is allocated. Rather than specifying A1 uses and risking higher vacancy rates, retail need has been grouped within a broader use class range (A1 – A5) to ensure that floor space is flexible and can adapt to market needs quickly.
27. The addition of the word "based" after "retail" in Policy CC12 via **APP/MM45** would clarify that whilst retail provisions are the basis of the policy and floor

³ National Planning Policy Framework paragraph 23

⁴ Local Centres Assessment (2015) Examination Document LP60

space allocations in the business area, other supporting uses (within A1 - A5) would be acceptable in principle. This would provide additional flexibility within the policy to support the Plan's objective of providing a comprehensive portfolio of retail floor space and to reflect permitted development rights.

28. A greater proportion of floor space is proposed to be allocated in the City centre – over and above the initial projections in the Shopping and Centres study. As outlined in my LP report, this reflects the Plan's retail strategy to ensure the City centre remains the focal point for new retail based investment and to support its role at the top of the hierarchy capitalising on its City-wide catchment and accessibility. It would also support the Council's regeneration objectives by focusing investment in the centre in order to benefit the City as a whole and to ensure that its role within the sub-region is not undermined. The study identifies that additional floor space could help to increase market share in the City by attracting greater footfall and opportunities to make qualitative improvements in the retail offer to meet changing demands.
29. There is adequate evidence that sufficient new retail floor space could be delivered within the City centre when developments with extant planning permission and other commitments in the area are taken into consideration. Furthermore, the proposed allocations for retail uses in other centres within the hierarchy would enable opportunities to support and complement rather than compete with the City centre.
30. The Council's retail study⁵ identified a floor space requirement of 17,667 sq m for comparison goods for the City centre. However, this requirement includes an uplift of 10,000 sq m to take into account the City Centre South scheme which was included as an existing commitment. The projections in the retail study thus identified retail floor space needs over and above that to be provided at City Centre South. Distinguishing this allowance from the rest of the identified requirement in Table 3, reflects that the scheme is a central element to the delivery of the City's retail strategy and will ensure that the contribution from this development will not be double counted when the Council allocate provisions against the overall need.
31. **APP/MM51** would add a new criterion to Policy CC18 to clarify that the PSA is expected to accommodate at least 40,000 sq m of new floor space covering a range of retail needs (A1 to A5) in accordance with Table 3 (as amended). This change would ensure that the Policy is effective.
32. The retail study identifies a need for approximately 21,800 sq m retail warehouse floor space within the wider Coventry area over the Plan period. It says that additional floor space should be accommodated within the designated centres where possible but the study also highlights the opportunities to focus retail warehouse demand towards the City centre. In line with the sequential approach in the NPPF, the Plan seeks to focus retail warehousing and the types of users that occupy these units within the City. This would also provide a potential opportunity to promote the Council's wider regeneration objectives. **APP/MM14** and **APP/MM16** clarify that included within the floor space provision up to 2031, an allowance for approximately

⁵ Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

22,000 sq m of retail warehouse space which should be directed to the City centre, where appropriate.

33. A similar approach is taken with A2 provision which accounts for approximately 9,700 sq m. However, in order to be sufficiently flexible, **APP/MM16** is necessary to make clear that if it is not possible to provide new retail opportunities within the PSA or wider City centre through the sequential assessment process then the focus should be on the other centres within the hierarchy as appropriate.
34. Changes to Figure 16 via **APP/MM48** would ensure that the map includes the most up-to-date information in respect of the leisure and entertainment area of the City centre.

Conclusion on Issue 2

35. Subject to these modifications which are necessary to ensure their effectiveness, the AAP's policies for retail development in the City centre are sound.

Issue 3 – Whether the City Centre Area Action Plan's policies for enhancing accessibility are effective?

36. The AAP seeks to create a highly accessible City centre where people will find it easy to access, understand and move around in. The AAP recognises that the economic geography will change during the life of the Plan, most notably a likely increase in focus of economic activity towards southern parts of the City centre as the Friargate and Southern Precinct developments come forward. As such, the AAP says that it is essential that the City has a comprehensive integrated transport network in place to ensure new development opportunities are highly accessible making them more attractive for new business growth and well connected to other parts of the City.
37. The LP sets out how the Council will work in partnership with neighbouring local authorities, Local Enterprise Partnerships, the West Midlands Combined Authority (WMCA) and others to deliver the necessary infrastructure to support growth. The West Midlands Strategic Transport Plan sets out the overarching transport strategy for the area and the LP's policies, in particular those that support strategic connectivity such as rail, HS2 and rapid transit, are consistent with that strategy. As part of its joint working, the Council is working with Transport for the West Midlands (TfWM) - the transport arm of the WMCA - to ensure that development proposed in the LP would be taken into account when planning future public transport and network requirements.
38. Changes to the supporting text of Policy CC11 via **APP/MM32** set out how the Council is working with TfWM on the Strategic Transport Plan whilst **APP/MM33** and **APP/MM42** provide additional clarity in respect of walking and cycling routes which should be connected to new development sites and link to the existing public transport network. These changes also clarify that the pedestrian and cycle routes should connect to the public transport network and to the TfWM strategic cycle network as set out in the Strategic Transport Plan.

39. **APP/MM36** to **APP/MM39** would clarify how the Council will work with TfWM to develop the bus network and measures to support development through intelligent mobility schemes and improving the reliability of bus journey times on key routes. The MMs also set out the vision for a network of Rapid Transit routes to be fully integrated with national and regional rail services and local bus services. Further changes to the supporting text of Policy CC11 (**APP/MM35**) would place greater emphasis on the importance of rail facilities, in particular, Coventry station. These changes would set out that a master plan has been developed for the station area which will provide for improved linkages and a transport interchange linked to a new cycle parking hub.
40. **APP/MM40** refers to how consideration should be given to the parking standards in the Strategic Transport Plan in new development as well as to park and ride schemes which will support the City centre by increasing access to the metropolitan rail and rapid transit network. This would better reflect the Strategic Transport Plan.
41. Further changes to Policy CC11(**APP/MM44**) would clarify how redevelopment of listed car parks in the City centre should have regard to TfWM's parking policy objectives as well as balancing parking needs with promoting the use of public transport, cycling and walking. These changes would ensure that the Policy reflects fully the objectives of the Strategic Transport Plan. In addition, an additional criterion in part d. of the Policy would ensure that development proposals would have regard to, and where appropriate, make provision for the development of Rapid Transit (**APP/MM43**). This would also support the objectives of the LP and Strategic Transport Plan.

Conclusion on Issue 3

42. Subject to the MMs identified as necessary for soundness, the AAP's policies for transport and accessibility are justified and effective.

Issue 4 – Are the AAP policies effective and does the AAP set out effective arrangements for implementing and monitoring the achievement of its policies and proposals?

43. The LP seeks to provide at least 24,600 homes over its lifetime and sets out how this requirement will be met. Some of this new housing is proposed to be delivered within the City centre and the AAP seeks to encourage the development of more homes within the City centre. Approximately 15% of all new homes have been built in the centre in the last 10 years. Changes to Table 1 and its introductory text via **APP/MM9** and **APP/MM10** provide updated, more accurate figures in respect of the number of completions within the City centre and outside it over the last 10 years (2006/7 to 2015/16). These changes are necessary to provide the most accurate figures and to ensure that ongoing monitoring of the number of homes delivered within the City centre would be effective.
44. In addition, changes to the AAP to provide up-to-date figures for the number of completed purpose built student accommodation in the City centre would ensure that there is an accurate figure in the AAP which could be monitored effectively (**APP/MM11**). **APP/MM11** would also ensure that a more

accurate figure is shown in respect of completed conversions of offices to homes in the City centre.

45. Policy CC24 relates to the City centre's University and enterprise area and sets out requirements for development proposals in this area. Changes set out in **APP/MM53** would add clarity to the policy's requirements by confirming that high quality building(s) would be supported on land to the east of the Computer and Engineering Building on Gulson Road. Also, proposals for the Grade I listed Whitefriars Monastery should not have a detrimental impact upon the surrounding public realm (in addition to the architectural and historic interest of the building). Proposals should also respect the design unity of this part of the University and Enterprise area.
46. The Monitoring Framework sets out a series of indicators against which implementation of its policies and proposals will be measured. **APP/MMC** amends a number of these and adds new ones to ensure that monitoring will be effective. In particular, these additions include monitoring indicators for delivery of the AAP's targets for the delivery of housing, employment land, offices and retail. The modifications include monitoring indicators to measure delivery of key regeneration schemes as well as public realm projects.

Conclusion on Issue 4

47. Subject to the MMs identified as necessary, the AAP's policies are sound and there are effective arrangements for implementing and monitoring the achievement of the AAP's policies and objectives.

Assessment of Legal Compliance

48. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The City Centre Area Action Plan has been prepared in accordance with the Council's LDS 2015.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2012. Consultation on the City Centre Area Action Plan and the AAP/MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report January 2016 sets out why AA is not necessary. Natural England supports this.
National Policy	The City Centre Area Action Plan complies with national policy except where indicated and AAP/MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The City Centre Area Action Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

49. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
50. The Council has requested that I recommend AAP/MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Coventry City Centre Area Action Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

R. Phillips

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Schedule of proposed modifications – Local Plan and City Centre Area Action Plan - November 2017

The tables below lists both the minor and main modifications that have been undertaken upon the Coventry Local Plan and the City Centre AAP for varying reasons. Please note that only specific alterations have been listed, and changes to the formatting/layout or grammatical corrections have been considered as a single reference number – see LP/MOD.A and LP.MOD.B etc.

The tables are presented in the following order:

1. **Local Plan Minor Modifications** – these relate to changes that are not necessary to support matters of soundness and largely relate to matters of factual correction, presentation and/or grammatical considerations.
2. **Local Plan Main Modifications** – these relate to changes that are deemed necessary to support the soundness of the Plan. They predominantly relate to policies or supporting text and respond to the Inspectors Action Points.
3. **City Centre AAP – Minor Modifications**
4. **City Centre AAP – Main modifications**

Modification Reference Number	Page Number / Policy Reference	Proposed Amendment	Justification and Reasoning
LOCAL PLAN MINOR MODIFICATIONS			
LP/MOD.A	Throughout LP Document	All figure numbers in the LP policies, introductory/supporting text and figure/table captions themselves, have been amended so that they are referenced accurately and consistently, and tables and figures are presented in numerical order. Where appropriate figure/table numbers have been changed to reflect this.	To ensure accuracy throughout the Plan.
LP/MOD.B	Throughout LP Document	The document has been reviewed in its entirety in order to ensure it is consistently formatted and presents correct grammar throughout. This includes minor changes such as spelling and grammatical corrections.	To ensure accuracy throughout the Plan.
LP/MOD.1	p.3, List of Key Abbreviations	SUDS - Sustainable Urban Drainage Systems	Correction to acronym.
LP/MOD.2	p.3, List of Key Abbreviations	Additional abbreviation – PHE – Public Health England	Additional abbreviation and acronym.

LP/MOD.4	p.5, Purpose and Role of the Draft Local Plan – introductory text	The Local Plan is currently at ‘publication stage’ meaning this is the version of the Plan the Council believes is suitable to submit for public examination. It has been prepared under the Planning and Compulsory Purchase Act (2004) meaning the Council is seeking representations on the “soundness” and “legal compliance” of these proposals under regulations 19 and 20 of and the Town and Country Planning Regulations (2012). Subject to this final stage of statutory engagement and the representations received by the Council, the Local Plan will be submitted to the Secretary of State for public examination by an independent inspector.	To prepare the document for conversion from ‘Proposed Draft’ to ‘ready for adoption’ stage.
LP/MOD.5	p.6, Background – How the Plan has been Developed – introductory text	The existing <u>previous</u> Coventry Development Plan was adopted in 2001, with the Regional Strategy adopted in 2004. The table below sets out the range of engagement activity that has been undertaken over the course of the last 10 years. <u>supported the development of this Plan.</u>	To prepare the document for conversion from ‘Proposed Draft’ to ‘ready for adoption’ stage.
LP/MOD.6	p.6, Table 1	<u>March 2017 - New Local Plan – Proposed Modifications</u>	To prepare the document for conversion from ‘Proposed Draft’ to ‘ready for adoption’ stage.
LP/MOD.7	p.6, Key Date and Engagement Events – introductory text	<u>The Local Plan is also supported by a Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), a Habitat Regulations Assessment (HRA) and Health Impact Assessment (HIA).</u>	Additional paragraph to add clarity to introductory text by making explicit reference to specific documents in the evidence base.
LP/MOD.8	p. 7, Key Dates and Engagement Events – introductory text	As such, the housing needs of the HMA have been established through a range of research <u>largely</u> completed by the 6 Local Planning Authorities and GL Hearn planning consultants between 2013 and 201 <u>6</u> 5 .	Additional wording to improve accuracy of text + Change of date to acknowledge progression of time.
LP/MOD.9	p.8, The Duty to Cooperate – introductory text	<u>Agreed Memorandum of Understanding across Coventry and Warwickshire relating to housing requirements and employment land (2015 and 2016);</u>	Additional bullet point to add clarity to introductory text and ensure the most up to date documentation is referenced.
LP/MOD.10	p.8, The Duty to Cooperate – introductory text	Establishment of a Coventry and Warwickshire and South East Leicestershire Shadow Economic Prosperity Board <u>Joint Committee</u> for council leaders and the LEP;	Alteration to reflect the change of name.

LP/MOD.11	p.9, The Duty to Cooperate – introductory text	<p><u>Establishment of the West Midlands Combined Authority:</u> + Subsequent references to the WMCA.</p>	Additional bullet point to acknowledge the formation of the WMCA during the LP process.
LP/MOD.17	p.13, Community and Stakeholder Engagement	<p>Community and Stakeholder Engagement</p> <p>As set out above this Plan contains a suite of policies the Council feels are sound, legally compliant, and suitable to submit to the Secretary of State for public examination. The Council does however recognise the statutory need to engage with local communities and stakeholders to test its views and proposed policies prior to submission.</p> <p>This statutory process will commence on the 18th January 2016 and run for 6 weeks until 29th February 2016.</p> <p>As part of the process specific events will be held across the city with local communities and key stakeholders to help the Council understand areas of support and challenge.</p> <p>A Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) has been undertaken at each stage of the Plan and used to help shape policies and proposals, including within this Publication Draft. The final version of the SA/SEA is available to view as part of the supporting documents released by the Council that relate to this period of engagement on the new Local Plan.</p> <p>The Local Plan is also supported by a Habitat Regulations Assessment (HRA) and Health Impact Assessment (HIA).</p> <p>All responses should be submitted to the Council by 5pm on 29th February 2016 and should preferably be submitted via email to: localplan@coventry.gov.uk</p> <p>Alternatively responses can be submitted to the following address: Coventry City Council Planning Policy Department Floor 3, Civic Centre 4 Much Park Street, Coventry CV1 2PY</p>	Complete deletion of sub-section to prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.

		Or, handed in at any one of the city's Libraries, so long as they are clearly marked for the attention of the Council's Planning Policy department (as above).															
LP/MOD.23	p.19, Retail Floor Space Needs – introductory text	Within its boundaries Coventry contains a wide range of designated centres of varying sizes and scales which support the city centre at the top of the retail centres hierarchy. The council's new retail town centre policies have been informed by a range of evidence documents, but most importantly the update to the Shopping and Centres Study completed by Nathaniel Litchfield and Partners in 2014 5 . This study undertook an assessment of the city's retail based needs, looking at 2 levels of population growth linked to capacity and needs.	Alteration of wording to improve accuracy of text + Change of date to acknowledge progression of time.														
LP/MOD.29a	p.23, Policy DS2 – supporting text	Highways England	Insertion of public body to correct a previous omission.														
LP/MOD.41	p.46, Table 3.1	<table border="1"> <thead> <tr> <th><u>Supply Components</u></th> <th><u>Site Size (Ha)</u></th> </tr> </thead> <tbody> <tr> <td><u>Completions 2011-2016 (includes Ryton, Ansty & within Coventry)</u></td> <td><u>70.3</u></td> </tr> <tr> <td><u>Under Constructions in Coventry (excluding proposed allocations)</u></td> <td><u>3.1</u></td> </tr> <tr> <td><u>Extant Permissions in Coventry (excluding proposed allocations)</u></td> <td><u>14</u></td> </tr> <tr> <td><u>Extant Permissions and under constructions at Ryton & Ansty</u></td> <td><u>53.4</u></td> </tr> <tr> <td><u>Proposed Site Allocations*</u></td> <td><u>107</u></td> </tr> <tr> <td><u>Total**</u></td> <td><u>247.8</u></td> </tr> </tbody> </table> <p>*57.79ha of land within proposed allocated sites already benefits from planning</p>	<u>Supply Components</u>	<u>Site Size (Ha)</u>	<u>Completions 2011-2016 (includes Ryton, Ansty & within Coventry)</u>	<u>70.3</u>	<u>Under Constructions in Coventry (excluding proposed allocations)</u>	<u>3.1</u>	<u>Extant Permissions in Coventry (excluding proposed allocations)</u>	<u>14</u>	<u>Extant Permissions and under constructions at Ryton & Ansty</u>	<u>53.4</u>	<u>Proposed Site Allocations*</u>	<u>107</u>	<u>Total**</u>	<u>247.8</u>	Deletion of previous version of table, and insertion of new table which displays the same information as preceding copy, although presented in slightly different format, + Includes updated figures to reflect date changes associated with progression of plan
<u>Supply Components</u>	<u>Site Size (Ha)</u>																
<u>Completions 2011-2016 (includes Ryton, Ansty & within Coventry)</u>	<u>70.3</u>																
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		permission for employment development. <u>** 4.5ha of the allocated allowance at Lyons Park has been completed in 2015/16 monitoring year. This is captured in the completions row of the above table. The allocations row is reduced accordingly to avoid double counting</u>	
LP/MOD.50	p.60, Policy H1 – supporting text	Through the housing trajectory though, the requirement <u>will be stepped</u> is however proposed to be phased to allow for the necessary step change in housing delivery to be managed in a sustainable and appropriate way... Policy H1 sets out the proposed phasing <u>stepped trajectory of the</u> requirements.	Alteration of wording to reflect change to Policy H1 – see LP/MOD.49
LP/MOD.64	p.75	Amend reference to policy H6 – should be to H7 instead.	Factual correction.
LP/MOD.71	p.83, Policy H11 – supporting text	In parallel with the performance of local centres and services, concentrations of HiMO's (<u>small and large</u>), shared accommodation and the private rented sector in general will be monitored closely as part of implementing this Local Plan and supporting the Housing Strategy.	Provision of further clarity in supporting text.
LP/MOD.72	p.85, Retail and Town Centre Uses	Coventry's Retail <u>Based</u> Needs	Change reflects action taken to satisfy Inspector Action Point 25 of Hearing Session 16.
LP/MOD.79	p.91	Amend reference to Policy JE8 – should reference JE6.	Factual correction.
LP/MOD.88	p.108, Policy CO3 – supporting text	Coventry has threetwo Parish Councils at Keresley, <u>Finham</u> and Allesley and a further emerging Parish Council at Finham , which have the autonomy to prepare either a Parish Plan or Neighbourhood Plan.	To reflect the situation change as the plan process has progressed since draft document was published.
LP/MOD.103	p.125, Policy GE3 – supporting text	In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city conurbation and connected corridors linking sites.	Change of wording to add clarity to supporting text.
LP/MOD.120	p.146 1 st main para.	All The initial scenarios have been run on a 'worst-case' basis to understand the potential impacts from additional vehicular traffic.	To add clarity to supporting text.
LP/MOD.123	p.156, Policy AC5 – introductory text	Options are also being considered for improved public transport connectivity to proposed HS2 interchange and the UK Central proposal in Solihull <u>through the HS2 Connectivity Package</u> .	Additional wording to add clarity to introductory text.

LP/MOD.125	p.159, Policy AC6, para. 4	Further details are set out in the Coventry Connected SPD, and Coventry Rail Investment Strategy <u>and the West Midlands Strategic Transport Plan</u> .	To acknowledge the publication of a new document subsequent to publication of draft Local Plan.
LP/MOD.141	P. 177 and 178	References within the supporting text to EM7 are amended to EM8.	To ensure consistency with new policy numbering.

LOCAL PLAN MAIN MODIFICATIONS			
LP/MOD.3	p.5, Introduction	It also allows for the city to maximise the benefits and connectivity to the proposed HS2 interchange and supporting development at UK Central as well as continued job creation at Ansty Park, Ryton, ProLogis Keresley, University of Warwick and the planned Coventry and Warwick Gateway <u>(including the JLR proposals at Whitley South)</u> .	Additional wording to add clarity to introductory text.
LP/MOD.12	p.10, Issues and Opportunities table	<u>Balance the needs of public transport, cycling and walking with those of the car</u>	Additional wording to acknowledge a required balance between sustainable transport modes and private methods.
LP/MOD.13	p.11 (point 1) + 12 (point 4), Vision Strategy and Objectives table	<u>Build on the universities as an engine for research, innovation and culture in the city.</u> <u>Support the city's two world class universities as they continue to strengthen their national and global reputation.</u>	Additional bullet points to ensure explicit reference is made to the progression of the cities two universities across the plan period.
LP/MOD.14	p.11 (point 2), Vision and Objectives table	Making the city more accessible for business, visitors and local people through better road, rail, <u>bus, Rapid Transit</u> and digital connections.	Additional wording to make explicit reference to Rapid Transit and to correct the omission of bus as a means of transportation. + To reflect the inclusion of bus and rapid transit provision included through; <i>Inspector Action Point 7 of Hearing Session 10 and Inspector Action Point 17 of Hearing Session 12.</i>

LP/MOD.15	p.11 (point 4) + 12 (point 7), Vision and Strategy Objectives table	<p><u>Provide a high quality public transport network which integrates with walking and cycling routes</u></p> <p><u>Ensure all housing is accessible by sustainable modes of transport</u></p>	Additional bullet point to ensure explicit reference is made to the improvement of the cities' public transport system and its aim of providing a balanced offering of transport modes across the plan period.
LP/MOD.16	p.10 (point 1) + 11 (point 2 and 3) + 13 (point 9), Vision and Strategy Objectives table	<p>Additional reference added to Policy DS4 to all listed points.</p> <p>Reference added to Policy H2 in relation to point 2 only.</p>	Reflects the introduction of new Policy DS4 and updates to infrastructure requirements.
LP/MOD.18	p.15, Policy DS1, Introduction – introductory text	<p><u>As part of the Local Plans public examination a detailed review of the 2014 based sub-national population projections (ONS), the respective household projections (DCLG) and the 2015 mid-year population estimates was undertaken. This reflected the timely release of this data during the examination process. The information was reviewed as part of a joint Coventry and Warwickshire commission and showed a continued growth in housing need in Coventry. This growth was however offset by a decrease in growth projections for Warwickshire meaning the overall needs of the Coventry and Warwickshire Housing Market Area are actually projected to decrease by 35 homes a year. For the avoidance of doubt this assessment highlights the city's population to grow by in excess of 100,000 people with a revised housing need of 47,320. Again, though this additional growth is to be offset by a decline in growth pressure within Warwickshire. As such, the updated information has very little impact on the ability of the: Local Plans for Coventry and Warwickshire to meet the needs of the HMA in accordance with national guidance. For this reason no adjustment was made to the policy structure of this Plan. Should the situation change in future years however then the Plan will be reviewed in accordance with Policy DS.1</u></p>	Additional paragraph to add clarity to introductory text. This also helps respond to the Inspectors Action Point 1 of Hearing Session 14.

LP/MOD.19	p.16, Housing Needs - introductory text	<u>As set out above, although the 2014 based data suggests an increase in the OAN for the city it also shows that this is more than offset by a decrease in OAN across Warwickshire. As such, the housing needs of the HMA remain stable. In this context though the city's OAN will continue to be considered as a minimum level of provision for the purposes of this Plan.</u>	Additional wording to clarify the housing OAN following the release of updated data in 2016. To partly satisfy Inspector Action Point 1 of Hearing Session 14.
LP/MOD.20	p.16, Housing Need - introductory text	As a result, the Council have worked openly and constructively with its neighbouring authorities, particularly over the last 18 months to agree a Joint Memorandum of Understanding (MoU) on housing delivery (2015) to support all Local Plans for Coventry and Warwickshire. <u>This MOU is unchanged following the 2014 based data as the overall needs of the HMA remain stable and continued to be planned for in a positive way.</u>	Deletion of unnecessary wording, + Likewise to LP/MOD.17, additional text to clarify the Council's position on the OAN updated figures for housing.
LP/MOD.21	p.17, Employment Land Needs – introductory text	Coventry and Warwickshire Gateway (including Whitley Business Park <u>and Whitley South</u>) – Significant investment in advanced manufacturing, logistics, and hi-tech research and development opportunities to the south and south east sides of the city <u>supported by the global headquarters of JLR;</u>	Additional wording ensure explicit reference is made to Whitley South and JLR regarding the support of economic growth projects.
LP/MOD.22	p.19, Employment Land Needs – introductory text	<u>This redistribution has been agreed through a Coventry and Warwickshire Employment Land MOU (2016). The MOU has also agreed the site opportunities referenced above, and although 2016 monitoring suggests a slight improvement in the city's employment land position, there remains a significant shortfall against the overall requirement and an on-going need for deliverable employment land across the sub-region. This also reflects the minimum nature of the requirement identified in Policy DS1.</u>	Additional wording to paragraph which reflects changed to policy DS1.
LP/MOD.24	p.20, Retail Floor Space Needs – introductory text	Having regard to the city's position at the heart of the sub-region, the regeneration opportunities within the city centre and the identification of much of Warwickshire within the Coventry retail catchment area, the Local Plan makes provisions for the city's full retail <u>based</u> needs. In this context a total need of 843,952sq.m <u>843,952sq.m</u> of comparison retail floor space is required (A1-A5 including bulky goods retail) and a further 21,882sq.m of convenience retail floor space. This totals approximately 1076,000sq.m of retail <u>based</u> floor space. In delivering this floor space it is expected that around 20,200sq.m of comparison space will be reoccupied through existing vacant units leaving a further 865,800sq.m <u>865,800sq.m</u> to be planned for.	Alteration of figures, and deletion of wording to improve accuracy of introductory text.

LP/MOD.25	p.20, Policy DS1, para. 1a + b.	<p><u>A minimum of 24,600</u> additional homes.</p> <p><u>A minimum of 128ha</u> of employment land within the city's administrative boundary</p> <p>Where necessary the phrase: <u>at least</u>, has been inserted prior to the respective housing figures respectively throughout the document.</p>	To satisfy Inspector Action Point 2 of Hearing Session 2.
LP/MOD.26	p.20, Policy DS1, para. 1c	<p>84,900sq.m gross comparison-retail <u>based</u> floor space (<u>across use classes A1-A5 (including bulky goods)</u>) and 21,900sq.m gross convenience floor space by 2031, of which at least 70,000sq.m is to be allocated to Coventry city centre.</p>	To satisfy Inspector Action Point 1 of Hearing Session 7(b). + Addition and deletion of text and figures to ensue factual accuracy.
LP/MOD.27	p.21, Policy DS1, para. 3	<p><u>The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on it will commence immediately.</u></p> <p><u>Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -</u></p> <p><u>a) Through the Duty to Co-operate, the unmet housing and employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;</u></p> <p><u>b) Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;</u></p> <p><u>c) The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements;</u></p> <p><u>d) Any other reasons that render the Plan, or part of it, significantly out of date.</u></p>	To satisfy Inspector Action Point 2 of Hearing Session 1.
LP/MOD.28	p.21, Policy DS1 – supporting text	<p><u>Local Plan Review</u></p> <p><u>In the event that the Plan as a whole or a key part of it becomes out of date, it will be necessary to undertake a full or partial review of the Plan. Further to part 3 of Policy DS1 there are a number of factors that could render the Plan out of date:</u></p>	To satisfy Inspector Action Point 2 of Hearing Session 1.

		<p><u>a) Should one or more of the City's Warwickshire neighbours be unable to deliver the relevant proportion of the city's unmet development needs (for housing and employment as appropriate) as informed by the relevant MOU's then the city will explore all options to review its Local Plan. A failure to deliver the development needs in accordance with existing MOU's however should be evidenced by a public examination and subsequent adoption of the relevant Local Plan and have full regard to the Duty to Cooperate process.</u></p> <p><u>b) The Coventry and Warwickshire Memorandum of Understanding (MOU) may need to be updated to reflect changing circumstances and evidence. In the event that a new or revised Memorandum of Understanding would require substantive revisions to the Local Plan proposals, then a partial or full review is likely to be necessary. However a new or revised MOU will not necessarily require a review of the Plan where the changes can be accommodated within the Plan's existing strategy.</u></p> <p><u>c) National planning guidance is clear that updated evidence (such as new ONS population and respective household projections) will not necessarily render the Plan out of date. However where evidence signals a substantial and sustained change (either up or down) to the context of the Local Plan, this will trigger a review (partial or whole) of it.</u></p> <p><u>d) The delivery of the Local Plan's objectives, including the overall annual housing requirement will be closely monitored. Where the Plan's proposals and policies are clearly failing to deliver the Plan's overall strategy and objectives, the Plan will require a review.</u></p> <p><u>To ensure the Plan remains up to date and relevant, the Council is also committed to undertaking a comprehensive review of national policy, the regional context, updated evidence and monitoring data. The outcomes of this review will be reported to the Council before the end of March 2021 with a clearly justified recommendation as to whether a partial or comprehensive review of the Plan is required.</u></p> <p><u>During this period to 2021, the Council will also continue to work with the CWLEP</u></p>	
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		<u>and its Warwickshire neighbours to consider whether a statutory Single Spatial Strategy should be prepared to cover the HMA or part of it. In the event that the Council takes part in preparing a statutory Single Spatial Strategy, this will constitute a review of the Local Plan in accordance with this Policy.</u>	
LP/MOD.29b	p.25, Policy DS3, para. 1.	a) access to a variety of high quality green and blue <u>infrastructure spaces</u> ; e) low and, wherever possible, zero carbon homes ;	To satisfy Inspector Action Point 4 of Hearing Session 9 and Inspector Action Point 14 of Hearing Session 3.
LP/MOD.30	p.24, Policy DS2, para. 6	<u>6. Of particular relevance to parts 4 and 5 of this policy are the continued growth and expansion of:</u> <u>a. Jaguar Land Rover at Whitley;</u> <u>b. the University of Warwick;</u> <u>c. The wider Coventry Gateway proposals;</u> <u>d. Ansty Park;</u> <u>e. Pro-Logis Park at Keresley; and</u> <u>f. Proposed residential developments to the south of the city's administrative boundary.</u>	<i>To satisfy Inspector Action Point 3 of Hearing Session 7(a).</i>
LP/MOD.31	p.25-31, Policy DS4 and supporting text	New Policy (DS4) with associated supporting text which sets out the Master-planning principles for general development (part A) and with a specific focus on the proposed developments at Whitley (Part B) and the 2 SUE's (Part C and D).	<i>To satisfy Inspector Action Point; 6 of Hearing Session 3, 4 of Hearing Session 7(a), 10 of Hearing Session 8, 3 of Hearing Session 10, 4 of Hearing Session 15, and 7 of Hearing Session 16.</i>
LP/MOD.32	p.35, Policy HW1 – supporting text	<u>These guidelines will form a platform to support the Council's HIA SPD.</u>	Additional wording to aid clarity of supporting text.
LP/MOD.33	p.35 + p.36, Policy HW1 – supporting text (part 1)	<u>To support this process the Council will develop a HIA SPD. This will also build upon the current Health Impacts Tool Kit being developed by Birmingham City Council and which is expected to be rolled out across the WMCA in 2017. The development of this toolkit to date has involved partnership working with representatives from the development industry and Public Health England (PHE). Once launched it is expected to carry with it an associated accreditation supported by PHE. In the event that this tool kit is not rolled out across the WMCA or the toolkit is shown to be inappropriate for a specific development proposal, the HIA</u>	<i>To satisfy Inspector Action Point 12 of Hearing Session 3.</i> + Addition of wording to improve clarity of text and ensure the proposed approach is more reflective of national guidance and the local context.

		<u>SPD will provide guidance as to alternative tool kits that will support health considerations in new developments across Coventry.</u>	
LP/MOD.34	p.36, Policy HW1 – supporting text (part 2)	<p>(c) all forms of residential development where:</p> <p>(i) the number of homes to be provided is 150 or more; or</p> <p>(ii) the site area is 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);</p> <p>d) all forms of urban commercial development (<u>not involving housing</u>) where:</p> <p>(i) the area of development exceeds 1ha floor space to be created by the development is 1,000 square metres or more; or</p> <p>(ii) in the case of industrial estate development exceeds 5ha the site area is 1 hectare or more.</p> <p><u>Notwithstanding the identified thresholds, all developments, including those below them, will be encouraged and recommended to complete the toolkit identified above and/or have full regard to how health benefits can be realised through development as part of the design process. By considering the use of this toolkit for sites below the threshold this could carry added benefit, especially within some of the city's more deprived areas where health and wellbeing concerns are more concentrated and in areas where issues are more isolated and/or related specifically to the proposed development or location of development. This process will also help in the consideration of the Local Plans policies on air quality, green spaces and active travel. Any consideration of benefits or impacts should have full regard to both the existing and new population that may live and/or work in or around the proposed site.</u></p>	<p><i>To satisfy Inspector Action Point 12 of Hearing Session 3.</i></p> <p>+ Deletion/addition of wording to improve clarity of text and ensure the proposed approach is more reflective of national guidance.</p>
LP/MOD.35	p.38, Jobs and Economy – introductory text	<ul style="list-style-type: none"> • <u>Financial, Legal and Business Support Services – 3,11,1200 FTE jobs;</u> • <u>Education – 23,8600 FTE jobs;</u> • <u>Health – 3,800 FTE jobs;</u> • <u>Retail Trade – 2,0800 FTE jobs;</u> • <u>Construction – 2,700 FTE jobs;</u> • <u>Wholesale Trade – 24,4600 FTE jobs; and</u> • <u>Architectural and Engineering Services – 2,000 FTE jobs.</u> • Health – 1,400 FTE jobs; • Water, Sewerage and Waste – 1,200 FTE jobs; and • Residential and Social Care – 1,200 FTE jobs. 	<p>Additional information to add clarity to supporting text. Also to satisfy Inspector Action Point 2 of Hearing Session 7 (part A – employment).</p>

LP/MOD.36	p.39. Jobs and Economy – introductory text	<p><u>In particular, Jaguar Land Rover has established itself as a global business and is the UK's largest automotive employer, creating both direct and indirect jobs across the city, sub-region and UK as a whole. Jaguar Land Rover's existing site at Whitley Business Park is home to its global headquarters and is an advance engineer's facility, as well as the Jaguar Design department. The site currently employs in excess of 5,200 people with this figure expected to grow substantially in the coming years as Jaguar Land Rover continues to push forward with its own expansion plans. The City Council is committed to working jointly with Jaguar Land Rover and Warwick District Council in particular to help support the planned growth of Jaguar Land Rover in the most appropriate way. This includes the City Council's commitment to supporting the Whitley South proposals in Warwick District but also the allocation of land adjacent to Whitley Business Park at Baginton Fields. This site will help to create an employment hub for the south east corner of Coventry which could help support the longer term expansion of Jaguar Land Rover at Whitley, support the sustainable growth of its supply chain or provide a stand-alone inward investment opportunity.</u></p>	To strengthen the reference to JLR as a significant part of the city's economy and job creation.
LP/MOD.37	p.41, Policy JE1, para. e	Support companies, <u>including Jaguar Land Rover</u> , in retaining, expanding and/or relocating their headquarters operations within the city <u>and support the provision of new infrastructure that encourages these companies to grow.</u>	Additional wording in policy to specifically acknowledge JLR in terms of the role they play within Coventry's economy and employment base as requested by JLR.
LP/MOD.38	p.41, Policy JE1, para. i	<u>i) Support the continued growth of the city's two universities and in doing so maximise the economic development and other community benefits associated with them.</u>	Additional paragraph in policy to make explicit reference of the universities roles in Coventry's economy and employment base as requested by UoW and CU.
LP/MOD.39	p.44 + 45, Provision of Employment Land – introductory text	<p>These comprise firstly completions to date during the early part of the plan period during the financial years of 2011/2012 to 20154/20165. Such completions include those at the Ansty <u>Park</u> and Pro-logis Ryton sites within Rugby Borough Council's administrative area because these sites lie adjacent to the city's boundary and are therefore considered to form part of the city's employment land supply.</p> <p>Employment land completions for this period total <u>a little over 70ha</u>57ha comprising <u>2615</u>ha of completions on land within the city's administrative area,</p>	<p>Updated dates to indicate the progression of time since submission of draft Local Plan, consequently with updated figures to reflect this,</p> <p>+ Addition to, and deletion of, wording to clarify supporting text.</p>

		<p>30ha at Pro-logis Ryton and 1412ha at Ansty.</p> <p>The next supply components s comprises e extant planning permissions for employment development <u>and sites under construction</u>. Some <u>Certain</u> of the proposed employment allocations in Policy JE2 (or part there of) also benefit from extant permissions and therefore these have been excluded from these se <u>extant permissions</u> components s to avoid double counting as allocations also form part of the city's employment land supply. Bearing in mind the above, land with extant permission for B class employment uses totals 7059ha comprising 1117ha of land within the city's administrative boundary, 27ha at Pro-logis Ryton and 260ha at Ansty.</p> <p>Bearing in mind all of the above it proposed to allocate 8 sites for employment development which in total amount to 1074ha.</p> <p>The 2316.5ha previously developed Lyons Park site at Coundon Wedge Drive in the north west of the city is allocated for a mix of B1, B2 and B8 uses in accordance with the extant planning permission covering this site. Construction is currently nearing completion on of 5 industrial/warehouse units on 45ha of the site <u>has now been completed</u>. The remaining 19ha of of the site either <u>currently</u> remains undeveloped <u>or has commenced development in early 2017 so is subject to the allocation figure in Policy JE2</u>.</p> <p>3026.5ha of greenfield land at Whitley Business Park in the south east of the city are also allocated for a mix of research and development, industrial and storage/distribution uses (B1, B2 and B8) in accordance with previous planning approvals for employment development on this site.</p> <p>Detailed planning approval has recently been granted for a large B8 unit on 128ha of the site <u>with a further 9ha of the site expected to contribute towards the growth aspirations of JLR in association with the land at Whitley South (in Warwick District)</u> and another planning application has recently been submitted for an industrial/warehouse unit (B1/B2/B8) on a further 3ha.</p>	
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LP/MOD.40	p.46, Provision of Employment Land - introductory text	It can be seen that the supply components total 248.6 ha which <u>relate positively towards the identified needs</u> broadly aligns with the employment need of around 215ha suggested by GL Hearn for the Plan period. <u>This level of provision both within and adjacent to Coventry also supports the Coventry and Warwickshire employment Land MOU and the aspirations of the LEP and its Strategic Economic Plan.</u>					Alteration to wording in order to provide an accurate reflection of changes to Table 3.1 – see LP/MOD.41
LP/MOD.42	p.47, Policy JE2, para. 1	JE2:2	Lyons Park	Bablake	19.6.5	B1, B2 & B8	Correction to figures in order to ensure factual accuracy.
		JE2:3	Whitley Business Park	Cheylesmore	30.26.5	B1b&c, B2 & B8	
LP/MOD.43	p.47, Policy JE2, para. 1 + 2	JE2:8	Former Electric Power Station Land off at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	B1c & B8	To satisfy Inspector Action Point 5 of Hearing Session 7(a), + To satisfy Inspector Action Point 6 of Hearing Session 7(a).
		The Friargate, A45 Eastern Green, Whitmore Park, and Durbar Avenue <u>and Alderman's Green Road and Sutton Stop</u> employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.					

LP/MOD.44	p.54, Accessibility to Employment Opportunities – introductory text	<p><u>Within the West Midlands Integrated Transport Authority's Strategic Transport Plan, there are a number of policies promoting 'Economic Growth and Economic Inclusion'. These promote improvements in transport infrastructure including Rapid Transit, improved bus services and enhanced walking and cycling measures, alongside policies to improve junction pinch points. Investments in such infrastructure are considered throughout this Plan and will serve new employment sites, to enable new travel demands to be met successfully through sustainable forms of travel. As such, new development must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks. Sustainable travel improvements will then allow employment sites to be developed, enabling new travel demand to be met by sustainable forms of travel.</u></p>	Additional paragraph added to provide stringer links to the Strategic Transport Plan and its link to sustainable access to jobs in order to support economic growth.
LP/MOD.45	p.54, Policy JE7, para. b	<p><u>Developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.</u></p>	Additional paragraph to enhance the clarification of the policy.
LP/MOD.46	p.56 + 57, Delivering Coventry's Housing Needs – introductory text	<p>Since 2006 however the annual average has dropped to approximately 85<u>79</u> dwellings.</p> <p>The level of urban regeneration proposed by this Local Plan will see a continuation of demolition, especially within the areas of Wood End, Henley Green, Manor Farm and Canley, with at least 350<u>300</u> further homes expected to be cleared up to 2031.</p> <p>Notwithstanding this reduction, there remain approximately 1,100<u>300</u> long-term vacant properties within the city, which with intervention could be brought back into use, helping to meet local housing needs.</p>	Alteration to figures to ensure they display factually correct information.
LP/MOD.47	p.59, Scale of Housing Development – introductory text	<p>As previously highlighted in earlier sections of this plan however, <u>the cities OAN needs to be considered in the context of its HMA as</u> not all of these homes can be delivered within the city's boundaries. Following a thorough consideration of sustainable development principles, the constraints identified in the NPPF and a thorough assessment of land options through the Council's updated SHLAA 2015, a capacity of approximately up to 25,000 homes has been identified.</p>	Addition and alteration of wording to add clarity to introductory text.
LP/MOD.48	p.59, Table 4.1	<p>Table 4.1: Components of housing supply 2011 to 2031</p>	To satisfy Inspector Action Point 2 of hearing Session 3.

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		<u>Total</u>	<u>25,372</u>		
		<p>* In addition to the number of homes under the Proposed Site Allocations (Local Plan), 169,406 dwellings have been completed <u>as of April 1st 2016</u> in 2014/15 and 962,033 homes have planning permission or are already under construction (at April 1st 20165). These are included in the relevant headings in the table and are not double counted.</p>			
LP/MOD.49	p.60, Policy H1, para. 2	<p><u>As part of the housing trajectory (Appendix 1),</u> this requirement is to be stepped<u>phased</u> in the following way:</p>		To satisfy Inspector Action Point 4 of Hearing Session 3.	
LP/MOD.50	p.60, Policy H1 – supporting text	<p>Through the housing trajectory though, the requirement will be stepped is however proposed to be phased to allow for the necessary step change in housing delivery to be managed in a sustainable and appropriate way... Policy H1 sets out the proposed phasing<u>stepped trajectory of the</u> requirements.</p>		Alteration of wording to reflect change to Policy H1 – see LP/MOD.49	
LP/MOD.51	p.60, Policy H1 – supporting text	<p>for 2 successive years. As such, the land supply position</p>		Deletion of text which reflects the changes to trigger points throughout the LP.	
LP/MOD.52	p.60, Policy H1 – supporting text	<p><u>To ensure a robust assessment of land supply is undertaken monitoring will consider the Sedgefield approach and factor in a 5% supply buffer as standard unless there is evidence of persistent under delivery against the housing trajectory which supports Policy H1 of this plan. Through the AMR, land supply will also be assessed against a 20% buffer and give consideration to the Liverpool approach. This additional sensitivity monitoring will also be utilised as an early warning mechanism to identify any potential need for an early review of the SHLAA or early preparation of the ‘Supporting Housing Delivery DPD. This monitoring approach.....</u></p>		To satisfy Inspector Action Point 1 of Hearing Session 3.	
LP/MOD.53	p.61, Policy H1 – supporting text	<p>Through its AMR monitoring process the Council will therefore <u>monitor closely the proportion of development on brownfield sites. This is with a view to encouraging and supporting</u>cook to achieve a majority of annual completions on brownfield sites. Should this fail to materialise for 2 consecutive monitoring years then the Council will consider this a secondary trigger in the delivery of its ‘Supporting Housing Delivery Development Plan Document’. <u>Such monitoring data would not in itself however constitute a reason for refusing a greenfield development proposal.</u></p>		To satisfy Inspector Action Point 11 of Hearing Session 16.	

LP/MOD.54	p.61-64, Table 4.2	Various changes to 'Essential Site Specific Requirements and Other Uses' column. This relates to sites at Keresley, Eastern Green, Walsgrave Hill Farm, Whitmore Park, Browns Lane, Sutton Stop, Cromwell Lane, London Road / Allard Way and Grange Farm. This also results in some small adjustments to the site boundaries which are outlined in the supporting documentation (where appropriate).	To add clarity and certainty to the information relating to proposed site allocations for housing.
LP/MOD.55	p.64, NB to Table 4.2	<i>Site capacities have been rounded and add up to 96 dwellings more than the figures in Table 4.1, which reflects permissions and phasing to date.</i>	Factual correction to figure.
LP/MOD.56	p.63 and 65.	<p><u>In order to support the sustainable access to the sites identified above a number of cases are envisaged whereby local transport infrastructure will require either partial or entire construction upon land that will remain within the Green Belt. Paragraph 90 of the NPPF states "Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. Para 90 goes on to clarify that this includes "local transport infrastructure which can demonstrate a requirement for a Green Belt location".</u></p> <p><u>Having regard to national policy alongside the essential requirements outlined in Policy H2, the Master planning principles outlined in policy DS4 and the proposed Green Belt boundaries in policy GB1 the following sites will require local transport infrastructure that clearly demonstrates a requirement for a Green Belt location.</u></p> <ul style="list-style-type: none"> • <u>Keresley SUE – Highway proposals associated with the Link Road between Winding House Lane and Long Lane</u> • <u>Eastern Green SUE – The new junction from the A45 will require land to the north of the A45 to ensure traffic flows on the road are not compromised</u> • <u>Walsgrave Hill Farm – highway proposals associated with the new junction at the A46 and the blue light access</u> • <u>Sutton Stop – junction improvements to Alderman's Green Road</u> • <u>The Grange Children's home, Waste Lane – possible access improvements at Waste Lane and/or Brownhill Green Road</u> <p><u>In the case of land at Eastern Green and Sutton Stop this will also relate to policy JE2 should the employment elements of the site be brought forward separately.</u></p>	<i>To partly satisfy Inspector Action Point 4 of Hearing Session 15, + 2 of Hearing Session 5.</i>
LP/MOD.57	p.65, Policy H3, para. 4	<u>Wherever possible n</u> New developments should also be:	<i>To satisfy Inspector Action Point 7 of 3.</i>

LP/MOD.58	p.66, Policy H3, para. 6	<u>Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset, to ensure all sites have easy access to high quality public transport and walking and cycling routes</u>	<i>Additional paragraph to add clarity to policy.</i>
LP/MOD.59	p.66, Policy H3, para. 7	Developer Contributions via Community Infrastructure Levy and/or Section 106 Obligations may be required to address any deficiency.	<i>To partly satisfy Inspector Action Point 8 of Hearing Session 3. See LP/MOD.60.</i>
LP/MOD.60	p.66, Policy H3 – supporting text	<u>Should development come forward that is deficient against the criteria in policy H3 then the site specific circumstances will be considered to understand the extent to which the criteria are not met. Should it be deemed appropriate and justified without excessively impacting on development viability, developer contributions will be required via a Section 106 agreement and/or CIL. This will be managed through Policy IM1.</u>	<i>To partly satisfy Inspector Action Point 8 of Hearing Session 3. See LP/MOD.59.</i>
LP/MOD.61	p.66, Policy H3 – supporting text	<p>When considering public transport options in particular new homes should <u>comply with the TfWM's access standards of 400m to a bus stop and</u> seek to maximise connectivity to the existing network and facilitate extensions to this network where practicable. <u>This should include new and improved bus connections with good service frequency to serve new larger sites where appropriate and practical.</u></p> <p>In responding to Government objectives of facilitating the delivery of self-build homes and starter homes the Council have considered that some limited provision of these could <u>in accordance with national Green Belt policy,</u> represent acceptable development within the Green Belt, but only where they represent limited infill opportunities within existing ribbon developments and complement the existing street scene.</p>	<i>Additional wording to paragraph to add clarity to supporting text.</i>
LP/MOD.62	p.68, Policy H4, para. 2	In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types and sizes in accordance with the latest Strategic Housing Market Assessment:	<i>To satisfy Inspector Action Point 9 of Hearing Session 3.</i>
LP/MOD.63	p.72, Policy H6, para. 5	Where the specified level of affordable housing cannot be provided, <u>including for reasons of viability,</u> robust evidence must be presented to justify a reduced or alternative form of contribution.	<i>To satisfy Inspector Action Point 3 of Hearing Session 2.</i>

LP/MOD.65	p. 76, Policy H7 – supporting text	Should on-going monitoring identify a continuation of recent trends and demonstrate that this is not a short term deviation then the council will <u>consider the need for a targeted review of this Local Plan in accordance with Policy DS1 and the monitoring framework which supports this Plan.</u> bring forward allocated sites as part of its 'Supporting Housing Delivery Development Plan Document'.	<i>To satisfy Inspector Action Point 2 of Hearing Session 1.</i>
LP/MOD.66	p.76, Policy H7 – supporting text	By way of reasonable travelling distance, national guidance likens <u>draws some similarities between</u> sites for Gypsy and Travellers and to sites for general bricks and mortar housing. As such, the standards set out in policy H3 should be considered when determining applications for Gypsy and Traveller sites.	<i><u>To support the Policy position and help clarify the land supply approach for Gypsy and Traveller sites</u></i>
LP/MOD.67	p.77m Policy H8 – introductory text	To support future housing pathways, <u>opportunities for new Extra Care provision at least 10% of new homes built</u> within the Urban Extensions at Keresley and Eastern Green should <u>be considered at the Master planning stage.</u> therefore be provided to support Extra Care provision. <u>Within the urban extensions and through city wide development in general</u> whilst further opportunities should be taken to focus <u>make</u> new provisions around designated centres, with the recent development at the Butts a prime example of what can be achieved across the city	<i>To satisfy Inspector Action Point 4 of Hearing Session 2.</i>
LP/MOD.68	p.78, Policy H8 – supporting text	New dwellings should however also be built to, or be easily adaptable to Lifetime standards. Lifetime homes incorporate features, which make the dwellings easily adaptable to changing family needs, and enable everyone to live independently.	<i>To satisfy Inspector Action Point 15 of Hearing Session 3.</i>
LP/MOD.69	p.80, Policy H10 – introductory text	The supplementary evidence has identified the continuation of this trend, with in excess of 3,500 <u>2,500</u> bed spaces currently with extant planning permission.	Updated figures which reflect a progression in time as the document has progressed.
LP/MOD.70	p. 83, Policy H11, para. d	<u>The amenity value and living standards of future occupants of the property, having specific regard to internal space, garden/amenity space and</u>	Additional paragraph to enhance clarity of policy.
LP/MOD.73	p.86, Retail and Town Centre Uses: Coventry's Retail Based Need – introductory text	The allocation of <u>convenience floor space, A2 provision and</u> retail warehouse need towards the city centre reflects the recommendations <u>and overarching principles</u> of the Shopping and Centres Study and the need to consider such provisions sequentially through the hierarchy. As such, new retail warehouse opportunities should be provided within the Primary Shopping Area or wider city centre wherever possible <u>to meet these needs unless otherwise identified in Policy R1.</u> <u>If this does not prove possible through the Sequential Assessment process then provisions should be focused towards the other centres within the hierarchy as appropriate.</u>	<i>To partly satisfy Inspector Action Point 3 of Hearing Session 7, along with LP/MOD.74.</i>

<p>LP/MOD.74</p>	<p>p.86, Table 5.1</p>	<table border="1"> <thead> <tr> <th></th> <th>Convenience</th> <th>Comparison*</th> <th>A2</th> <th>A3-A5</th> <th>Retail Warehouse</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>City Centre</td> <td>10,000</td> <td>27,667</td> <td>8,700</td> <td>10,009</td> <td>21,758</td> <td>78,134</td> </tr> <tr> <td>Rest of City</td> <td>11,881</td> <td>13,175</td> <td>0</td> <td>2,630</td> <td>0</td> <td>27,686</td> </tr> <tr> <td>Total</td> <td>21,881</td> <td>40,842</td> <td>8,700</td> <td>12,639</td> <td>21,758</td> <td>105,820</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="5"><u>to 2031</u></th> </tr> <tr> <th><u>Convenience</u></th> <th><u>Comparison (A1)*</u></th> <th><u>A2</u></th> <th><u>A3-A5</u></th> <th><u>Retail Warehouse</u></th> </tr> </thead> <tbody> <tr> <td>City Centre</td> <td rowspan="2">21,882</td> <td>27,667</td> <td rowspan="2">9,712</td> <td>10,010</td> <td rowspan="2">21,758</td> </tr> <tr> <td>Rest of City</td> <td>13,175</td> <td>2,630</td> </tr> <tr> <td>Total</td> <td>21,882</td> <td>40,842</td> <td>9,712</td> <td>12,640</td> <td>21,758</td> </tr> </tbody> </table> <p>* <u>An allowance for at least 10,000sq.m of new retail floor space at City Centre South has been added into the short term projection.</u> <u>NB: all figures are for gross floor space</u> <u>NB: Source: Coventry Shopping and Centres Study (2014).</u></p>		Convenience	Comparison*	A2	A3-A5	Retail Warehouse	Total	City Centre	10,000	27,667	8,700	10,009	21,758	78,134	Rest of City	11,881	13,175	0	2,630	0	27,686	Total	21,881	40,842	8,700	12,639	21,758	105,820		<u>to 2031</u>					<u>Convenience</u>	<u>Comparison (A1)*</u>	<u>A2</u>	<u>A3-A5</u>	<u>Retail Warehouse</u>	City Centre	21,882	27,667	9,712	10,010	21,758	Rest of City	13,175	2,630	Total	21,882	40,842	9,712	12,640	21,758	<p>To partly satisfy Inspector Action Point 3 of Hearing Session 7b, along with LP/MOD.73.</p>
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Total retail floor space (all forms)	34,077	71,743	105,820
% pre 2021	32%	68%	100%

	<u>To 2021</u>	<u>2021-2031</u>	<u>Total 2011-2031</u>
=			
<u>Total Convenience Retail floor space</u>	<u>8,090</u>	<u>13,792</u>	<u>21,882</u>
<u>Total Comparison Retail floor space (A1)*</u>	<u>14,191</u>	<u>26,651</u>	<u>40,842</u>
<u>Total A2 floor space</u>	<u>3,189</u>	<u>6,523</u>	<u>9,712</u>
<u>Total A3-A5 floor space</u>	<u>7,183</u>	<u>5,457</u>	<u>12,640</u>
<u>Total Retail Warehousing floor space</u>	<u>2,425</u>	<u>19,333</u>	<u>21,758</u>
<u>Total</u>	<u>35,078</u>	<u>71,756</u>	<u>106,834</u>

* An allowance for at least 10,000sq.m of new retail floor space at City Centre South has been added into the short term projection.
NB: all figures are for gross floor space
NB: Source: Coventry Shopping and Centres Study (2014)

LP/MOD.76

p.88, Table 5.3

Retail Floor Space Supply Components	Gross Retail floor space (sq.m)	
	Convenience	Comparison/ Other
Sites With Planning Permission	1,725	2,502
Sites Under Construction	287	1,430
Occupation of vacant premises (outside of city centre)	0	10,600
Proposed Site Allocations (city centre)*	10,000	60,100
Proposed Site Allocations (wider city)*	10,200	10,000
Total	22,212	84,632

Retail Floor Space Supply Components	Gross Retail floor space (sq.m)		
	Convenience	Comparison A1	Other Retail based - A2- A5
<u>Completion since Study (2015-2016)*</u>	<u>125</u>	<u>1,430</u>	<u>0</u>
<u>Sites With Planning Permission</u>	<u>1,813</u>	<u>1,491</u>	<u>490</u>
<u>Sites Under Construction</u>	<u>818</u>	<u>0</u>	<u>0</u>
<u>Occupation of vacant premises (outside of city centre)</u>	<u>0</u>	<u>10,600</u>	
<u>Proposed Site Allocations (city centre)**</u>	<u>10,000</u>	<u>60,100</u>	
<u>Proposed Site Allocations (wider city)**</u>	<u>10,200</u>	<u>10,000</u>	
Total	22,956	84,111	

Alteration to table to increase breakdown of figures given which reflect the changes made in LP/MOD.74.

		<p><u>* Completions since study refers to the level of completed floor space in Coventry since the completion of the NLP Study in 2014. This study identified the level of need which has informed the Local Plan.</u></p> <p><u>** Allocations within the city centre include 33,825,184sq.m of retail floor space (use class A1-A5) with planning permission or under construction. Allocations within the wider city Include 1,843sq.m of floor space with planning permission or under construction.</u></p>	
LP/MOD.77	p.90, Policy R1, para. 3	Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not <u>have a significant adverse impact</u> directly impact on the city centre or is an essential element of supporting the wider parks tourism functions.	<i>To satisfy Inspector Action Point 4 of Hearing Session 7b.</i>
LP/MOD.78	p.90 + 91, Policy R1 – supporting text	<p>Like other centres across the city, this provides a focus on smaller units with an average floor space of <u>115,113</u>sq.m and no single units larger than <u>457,450</u>sq.m.</p> <p>When defining small scale local provisions evidence identifies that such units within similar Coventry centres would be between <u>36,35</u>sq.m and <u>780,700</u>sq.m, although the upper limit is influenced by a small number of larger units which are largely utilised for convenience goods.</p> <p>The new small scale provisions referred to in Policy R1 should therefor reflect this range of unit sizes, with no one unit exceeding <u>800,700</u>sq.m.</p>	Updated figures to improve accuracy.
LP/MOD.80	p.93, Policy R2, para. j + n +p	<p><u>j. Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure.</u></p> <p>n. Continuing to <u>support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan</u>; generate a balance and integration of the university with the wider city centre; and</p> <p><u>p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</u></p>	<i>To satisfy Inspector Action Point 4 of Hearing Session 12.</i>

LP/MOD.81	p. 95, Policy R3, para. 1	These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment, and are not more appropriately sited in the city centre.	<i>To satisfy Inspector Action Point 6 of Hearing Session 7b.</i>
LP/MOD.82	p.95, Policy R3, para. 3-5	<p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city (around a 3km radius) for:</p> <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city (a 2km radius) for bulk convenience shopping as well as an element of comparison shopping, service and catering uses.</p> <p>They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality (a 1km radius) for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses.</p>	<i>To satisfy Inspector Action Point 7 of Hearing Session 7b.</i>
LP/MOD.83	p. 97 + 98, Policy R4 – introductory text	<p>The Council's monitoring has identified an average unit size across all centres of 362267sq.m, although this does decrease to 220496sq.m when the city centre is excluded. In turn the average unit size within the city centre is 457384sq.m.</p> <p><u>Notwithstanding, the city's out of centre retail parks, which would be the most likely focus for out of centre proposals, contain units which average around 900-1,200sq.m in size.</u> As such, the evidence base suggests that on balance a threshold of <u>1,000</u>sq.m would be appropriate to apply for impact tests across Coventry.</p> <p><i>All references to an Impact Assessment made throughout the document have subsequently been altered from 400sq.m. to 1000sq.m where necessary.</i></p>	<i>To satisfy Inspector Action Point 5 of Hearing Session 7b.</i>
LP/MOD.84	p. 98, Policy R4, para. 2c and part 3	<p>Only where parts 2 a) and b) of this policy are satisfied the Sequential Assessment should have regard to:</p> <ul style="list-style-type: none"> I. Vacant units within the city's out of centre retail warehouse parks; and II. Local shopping parades, where the proposal is appropriate in terms of scale. 	<i>To satisfy Inspector Action Point 8 of Hearing Session 7.</i>

		Part 3 – adjust 400sq.m to be 1,000sq.m	
LP/MOD.85		<p>In addition to the centre hierarchy, Coventry hosts a range of out of centre retail warehouse parks, which provide a range of larger bulky goods retail units. Although these locations do not reflect the overall service offer or connectivity to justify being defined centres, they do support the city's overall retail and service offer, often drawing trade from city wide or sub-regional catchments. Furthermore, the city also includes a large array of well established local shopping parades, which serve the needs of the immediate locality, but often lack the quantum and diversity of offer to justify being a defined centre. They generally serve, primarily for "top up" convenience shopping, limited services and limited small scale food and drink uses and often contain at least 4 existing units.</p> <p>The Council considers however that where it has been demonstrated that sequentially preferable opportunities within defined centres cannot be identified that such sites do offer a sequentially preferable option compared to an isolated or standalone provision. This is reflected in Policy R4 and provides additional flexibility to the centres hierarchy. It also supports a more sustainable option giving greater opportunities for linked trips and economies of scale.</p> <p>[†] For the purpose of Policy R4, Coventry's out of centre retail parks include: Alvis Retail Park, Airport Retail Park, Central 6 Shopping Park and, Gallagher Retail Park.</p>	Deletion of wording to reflect changes made in LP/MOD.84.
LP/MOD.86	p.99, Policy R4 – supporting text	= <u>These will be considered on a site by site basis having regard to the location, size, scale and intended customer base of the proposal.</u>	Additional wording to add clarity to supporting text.
LP/MOD.87	p. 100, Policy R4 – supporting text	As a starting point the Council will consider the initial catchment areas of its centre hierarchy (as set out in policy R3), which include a city wide catchment for the city centre. These should be considered through the Sequential Assessment and Impact Test where they overlap with the site proposal. Further consideration can however be given to the scale and type of the proposal, its intended market area, drive time and access to both the highway and public transport.	Deletions to wording which reflect changes made in LP/MOD.84 + LP/MOD.85.
LP/MOD.89	p.110, Green Belt and Green Environment – introductory text	Coventry's <u>Exceptional</u> Very Special Circumstances <i>Accordingly, wherever 'very special' was used has been changed to 'exceptional' throughout the document as necessary and appropriate.</i>	<i>To satisfy Inspector Action Point 5 of Hearing Session 8.</i>

LP/MOD.90	p.111, Policy GB1, para. 2b	<u>Within areas designated as Local Green Space the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated.</u>	To clarify the policy position around the new Local Green Space designation. This will provide a local policy platform to compliment the NPPF.
LP/MOD.91	p. 112, Policy GB1, para. 4 + 4d	The following areas will be removed from the Green Belt and re-designated as Local Urban Green Space and are shown on the Policies Map: To ce il Wood Brook Stray	Change of designated name, + Correction of spelling to satisfy Inspector Action Point 3 of Hearing Session 8.
LP/MOD.92	P.113, Policy GB1, para. 7	In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development amongst existing ribbon developments would be considered appropriate where provisions for starter homes and self build properties are proposed.	<i>To satisfy Inspector Action Point 4 of Hearing Session 8.</i>
LP/MOD.93	p.113, Policy GB1 – supporting text	<u>Furthermore, it is important to highlight that section 3 and 7 of policy GB1 sit in part at least alongside section 9 of the NPPF by considering appropriate and inappropriate development within the Green Belt. In this context it is important to draw links to the supporting text of Policy H2 in this Local Plan in so far as it relates to the appropriate delivery of local transport infrastructure within a Green Belt location.</u>	<i>Additional paragraph to add clarity to supporting text and cross reference NPPF.</i>
LP/MOD.94	p.114, Policy GB1 – supporting text	<u>This approach will also be taken forward in relation to the land at around Charterhouse Heritage Park (policy HE3), the employment allocations at Whitley Business Park and Baginton Fields (Policy JE2) and the housing allocation at London Road / Allard Way (Policy H2:9).</u> <u>National Guidance requires development proposals within areas designated as Local Green Space to be considered against local policies which are consistent with policy for Green Belts. This principle is broadly accepted through Policy GB1, however it is important to consider the context of Green Belt policy against that of Local Green Spaces. Any development within Local Green Spaces should for example not impact on the initial purpose of land being considered as a locally important green space or impact negatively on criteria set out in Paragraph 77 of the NPPF. Of particular importance is land used for recreational and leisure use, especially sports pitches. It is acknowledged that some developments may be</u>	Additional paragraphs to enhance clarity of supporting text around the new Local Green Space designation..

		<p><u>required to support the continued use of sites as high quality sports pitches (e.g. buildings for changing facilities and related teaching or training provisions) and this would be supported in principle. Other acceptable examples will include the provision of:</u></p> <ul style="list-style-type: none"> • <u>new play equipment within parks and public spaces;</u> • <u>appropriate and suitable parking facilities at parks and public spaces;</u> • <u>appropriate lighting (in terms of scale and surrounding uses) to support sports facilities; and</u> • <u>the provision of appropriate and suitable footpaths and cycle ways to enhance accessibility to high quality green spaces.</u> <p><u>In all cases development should be ancillary to the primary purpose of the Local Green Space. Should development prevent the continued use of land for sports pitches, or other forms of Local Green Space (as appropriate) however, this will not be supported.”</u></p>	
<p>LP/MOD.95</p>	<p>p.115, Policy GB2 – introductory text</p>	<p>Reserved <u>Safeguarded Land in the Green Belt</u></p> <p><i>Accordingly, wherever ‘reserved land’ was used has been changed to ‘safeguarded land’ throughout the document as necessary.</i></p> <p>When considered alongside development options within Warwick District however the land could provide longer term possibilities for the release of land from the Green Belt to support cross boundary development <u>proposals</u> in Warwick District. <u>Given the nature of the areas involved though, the retention and delivery of infrastructure, most notably for highways, education or green spaces would be the main focus. This reflects the existing nature of these sites which largely comprise existing low density homes, existing education provisions or ancient woodland.</u></p> <p>It can however put a mechanism in place that responds to potential longer term development options meaning its own Plan <u>remains flexible and</u> retains a strong degree of flexibility and is able to respond to emerging circumstances in neighbouring areas.</p>	<p><i>To satisfy Inspector Action Point 6 of Hearing Session 8.</i></p>

		<p>Land along the southern boundary of Coventry is therefore intended to be <u>designated as safeguarded land for consideration as part of the next Local Plan review. This will have explicit regard to development proposals within Warwick District that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' and therefore render the Green Belt policy designations in these areas inappropriate. In this context, these sites are safeguarded in so far as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. As already highlighted, the sites themselves are largely utilised for a small number of low density homes, education provisions or undevelopable due to the presence of ancient woodlands.</u></p> <p><u>Should such development proposals not materialise within Warwick District however these sites will be considered for a formal return to the Green Belt due to the issues raised above.</u></p> <p>reserved for consideration for development as part of a delivery mechanism being triggered through the DtG with Warwick District Council or at the time of a subsequent Plan review.</p>	
<p>LP/MOD.96</p>	<p>p.116, Policy GB2, para. 1</p>	<p>Land south of Grotna Road;</p> <p><u>Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District.</u></p> <p>The land identified above will only be released from the Green Belt for development during this plan period where it forms an integral part of a comprehensive development scheme that involves both the Reserved Land within Coventry and the adjoining land in Warwick District — this could involve a range of development (including infrastructure). It would be with a view to delivering the wider development needs of the city and Housing Market Area. Until such time as the trigger set out above is enacted the land will continue to remain within the Green Belt and will be subject to the associated policies within the Local Plan.</p> <p>Any development within the reserved areas that would prejudice future</p>	<p>Alteration to policy in response to Inspector Action Point 6 of Hearing Session 8.</p>

		<p>comprehensive development as described above will not be permitted.</p> <p>Upon enactment of this policy the Council may review its Local Development Scheme in accordance with Policy DS2 to support the development of cross boundary evidence or development plan documents (as appropriate).</p>	
LP/MOD.97	p.116, Policy GB2 – supporting text	<p>Para 85 of the NPPF expressly mentions the opportunity to safeguard land within the Green Belt <u>as part of a Local Plan. It is not however allocated for development at the present time and is instead identified for consideration through future Plan reviews. As such, planning permission for the permanent development of safeguarded land will only be granted following a Local Plan review which proposes the development. In this context, should cross boundary development proposals within Warwick District include the wider development of any of these areas as part of a comprehensive development proposal then the Council will consider the significance of this in relation to the sites and the wider proposals. The Council will then determine if a need exists to undertake a targeted review of its Local Plan in this regard. This would be in accordance with Policy DS1 of this Plan. Such an event would also trigger the review of the Council’s Local Development Scheme with a view to supporting the delivery of cross boundary evidence or development plan documents (as appropriate) in accordance with Policy DS2.</u></p> <p><u>Of particular relevance is the existing use and purpose of these sites. In this context the future review of these safeguarded areas is unlikely to trigger the comprehensive development or redevelopment of these areas. Instead it will respond to changes in Green Belt policy and seek to remove any cases of Green Belt islands having been created by adjoining development in Warwick District. This especially relates to the education facilities at Bishop Ullathorne and Finham Park (primary and secondary). In such cases development proposals must ensure that the city’s education requirements continue to be met and where appropriate support sustainable accessibility to school places for residents of new homes.</u></p> <p>There is potential however for the land identified in this policy to be brought forward during this plan period, but this is dependent on development proposals in Warwick</p>	Change of wording in supporting text which reflects changes made in LP/MOD.95 and 96.

		<p>District. Consequently, it is not possible to identify areas as formally 'Safeguarded Land' as these would need to be set aside to meet potential long term development requirements in the next plan period. In addition release of the land would require a formal review of the city's development plan. To take this approach would therefore conflict with the NPPF and the potential outcomes of on going work with Warwick District Council through the DfC.</p> <p>The land in question is therefore reserved for future development but retained in the Green Belt until such time as the delivery mechanism is activated through the adoption of a Warwick District Council Local Plan that:</p> <ul style="list-style-type: none"> • specifically allocates land for development that is adjacent to these sites within the Coventry boundary; • which in doing so highlights the land within the Coventry boundary as being required to contribute towards a comprehensive development; and • would render the retention of land within the Coventry boundary as Green Belt inappropriate as it would create a 'Green Belt island' and mean the land no longer served the purposes of Green Belt. 	
LP/MOD.98	p.119, Policy GE1, para. 5 + 6	<p>Do culverting in the city centre should be considered, wherever possible, in accordance with the specific policies, set out in the City Centre Area Action Plan. <u>Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, re-instated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.</u></p> <p><u>d) Improving its functionality, quality, connectivity and accessibility;</u></p> <p><u>e) Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity;</u></p> <p><u>f) Integrating proposals to improve green infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes; and</u></p> <p><u>g) Flood risk management and improving surface water quality.</u></p>	Deletion and additional wording to add clarity to policy.
LP/MOD.99	p.123, Policy GE2	Add "or" after parts 1a and 1b of the policy.	To satisfy Inspector Action Point 8 of Hearing Session 8.

LP/MOD.100	p.124, Policy GE3, para. 1d	<u>d) preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.</u>	<i>To satisfy Inspector Action Point 6 of Hearing Session 9.</i>
LP/MOD.101	p.125, Policy GE3, para. 2	If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, <u>but only in exceptional circumstances.</u>	<i>To partly satisfy Inspector Action Point 5 of Hearing Session 9. See also LP/MOD.104.</i>
LP/MOD.102	p.125, Policy GE3, para. 3	Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, <u>ancient and newly-planted</u> and woodlands, ancient hedgerows <u>and heritage assets,</u> historic environmental assets and archaeological remains of value to the locality, will be protected against loss or damage. <u>In and, in</u> the case of archaeological remains, all practical measures must be taken for their assessment and recording <u>in accordance with Policy HE2.</u>	<i>To satisfy Inspector Action Point 2 of Hearing Session 9.</i>
LP/MOD.104	p.126, Policy GE3 – supporting text	Where this is not possible, mitigation measures should be identified, if these are not possible on site, then these should be offset elsewhere as a compensatory measure, <u>but only in exceptional circumstances. Such circumstances may include the comprehensive delivery of a planned strategic allocation in accordance with a Council approved Masterplan. In all such cases though, compensatory provisions should be made as close to the original site as possible.</u>	<i>To partly satisfy Inspector Action Point 5 of Hearing Session 9. See also LP/MOD.101.</i>
LP/MOD.105	p.126, Policy GE4, para. 1b + supporting text	trees not to be retained as a result of the development are replaced within <u>with new trees as part of</u> a well-designed landscape scheme; Should loss be unavoidable, compensatory provision <u>of new trees</u> should be proposed <u>as part of</u> within a well-designed landscape scheme or within other areas of green space within the local community. This will ideally be within 400m of the site to reflect the minimum distance recommended within the Green Space Strategy. <u>All replacement trees should also be of an appropriate type and status to reflect those which have been lost.</u>	<i>To satisfy Inspector Action Point 7 of Hearing Session 9.</i>
LP/MOD.106	p.129, Policy DE1, para. 3o	<u>o) Support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;</u>	<i>Additional wording which provides enhanced clarity to policy.</i>
LP/MOD.107	p.131, Heritage: Conservation Areas –	Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character and appearance	<i>To ensure supporting text is consistent with amended Policy HE2.</i>

	introductory text	of which it is desirable to conserve preserve or enhance’.	
LP/MOD.108	p.133, Policy HE2 – introductory text	In addition over 280 500 buildings have been selected by the Council for Local Listing due to their importance to Coventry. The city also has 16 Conservation Areas (plus a further two proposed through this plan), 20 Scheduled Ancient Monuments, 4 Registered Parks and Gardens and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record.	Alteration of figures to provide accurate information, + correction of terminology.
LP/MOD.109	p.133, Policy HE2, para. 1 + 7	In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve preserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. All proposals should aim to sustain and reinforce the special character and conserve preserve the following distinctive historic elements of Coventry:	<i>To satisfy Inspector Action Point 1 of Hearing Session 9.</i>
LP/MOD.110	p.134, Policy HE2, para. 7d	Buildings associated with the city’s industrial heritage; ribbon weaving, watch making , cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;	<i>Additional wording to correct previous omission.</i>
LP/MOD.111	p.135 + 136, Policy HE3 – introductory text	Through the Local Plan and partnership working with Historic England and the Historic Coventry Charitable Trust, the Council are promoting through this Local Plan the creation of a City Heritage Park in the <u>Sherbourne Valley and the</u> grounds of the Charterhouse and London Road Cemetery. These should include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along <u>the west side of the river crossing Gulson Road</u> Harper Road and Humber Avenue. These enhancements in connectivity and green infrastructure could may also facilitate comprehensive regeneration development opportunities <u>of brownfield land along the River Sherbourne, most notably between Gulson Road and Gosford Street and in Harper Road</u> within these areas that will complement this part of the city.	To reflect and support the changes made in LP/MOD.112.

		<p>In addition, opportunities should be taken to improve the setting of the Charterhouse, <u>the naturalisation of the river valley and the views through to the viaduct.</u> A pPrime examples <u>include land</u> is around Blue Coat School, where: land is to be removed from the Green Belt to support the expansion of the school's facilities on the basis that</p> <ul style="list-style-type: none"> <u>the existing car park is to be removed from the area of the Charterhouse Scheduled Ancient Monument;</u> and <u>The all-weather sports and playground facilities are to be relocated away from the riverside in an appropriate and sustainable way.</u> <p><u>These 2 areas should then be proactively re-naturalised or appropriately landscaped, adding to the Heritage Park where appropriate and supporting an extension to the current Local Green Space designation that is proposed for the land west of the river. The extension of the Local Green Space designation should be supported by new defensible boundary lines created as part of the Master planning process and brought forward in partnership with the local community, the school and the Charterhouse Trust.</u> in an appropriate way.</p> <p><u>To ensure Bluecoats school continue to offer a high quality education offer to the city however, these facilities will then be relocated onto former allotment land to the east of the river, which will be removed from the Green Belt providing a firm boundary for future school expansion.</u></p>	
<p>LP/MOD.112</p>	<p>p.136 + 137, Policy HE3 – para. 2 + 3</p>	<p>Land at Blue Coat School is to be removed from the Green Belt in accordance with policy GBE1 to support the expansion of school facilities on condition that the existing school car park is removed from the area of the Charterhouse Scheduled Ancient Monument. <u>In addition, the expansion of the school should also support the appropriate relocation of the all-weather sports facilities and playground areas to secure the enhancement of the riverside area. This should facilitate the and proactively re-naturalisation of the area ed in an appropriate way in order to enhance the setting of the Charterhouse, and its precinct <u>and the Heritage Park as a whole.</u></u></p> <p><u>The creation of the Heritage Park and expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendix 4).</u></p>	<p><i>To satisfy Inspector Action Point 3 of Hearing Session 9.</i></p>

LP/MOD.113	p.138, + 139, Accessibility: Relevant Evidence Base + Introduction – introductory text	<ul style="list-style-type: none"> Coventry Area Strategic Model (CASM) – WSP (2015 <u>and 2016</u>) <u>Working towards achieving current road casualty reduction targets and making our roads safer for all.</u> 	To acknowledge updated publication of document to support the plan, + Additional bullet point to enhance clarity of introductory text.
LP/MOD.114	p.139, Accessibility: Public Health and Air Quality – introductory text	<u>The Cycle Coventry Programme also helps support cycle infrastructure improvements and supporting Smarter Choice modes together with the TfWM's Strategic Transport Plan where it includes developing a metropolitan strategic cycle network to ensure seamless travel.</u>	<i>To partly satisfy Inspector Action Point 7 of Hearing Session 10.</i>
LP/MOD.115	p.140, Accessibility: Strategic Connectivity – introductory text	<u>The approved Strategic Transport Plan for the West Midlands Metropolitan Area "Movement for Growth" sets out the overarching transport strategy for the West Midlands Metropolitan area. The plan's approach of a metropolitan tier with a metropolitan rail and rapid transit network, key route network and metropolitan strategic cycle network will help deliver a transport system which boosts our economy and improves the environment.</u>	<i>Additional paragraph to provide further clarity to introductory text and strengthen links to Strategic Transport Plan.</i>
LP/MOD.116	p. 141 + 142, Policy AC1 – introductory text	<p>This can only be achieved if the transport network offers a wide choice of convenient, <u>affordable</u> and reliable transport modes which meet the needs of the varying types of trips which people need to make.</p> <p>Help to focus development towards accessible locations making it easier for local people to access employment, <u>education and skills</u>, shops and leisure facilities and reduce the distance people need to travel;</p> <p>It will be important that everyone in the city has a good level of access to major public transport hubs such as Coventry Station <u>and Pool Meadow Bus Station</u> to boost the attractiveness of public transport services.</p>	Additional wording to add clarity to introductory text.
LP/MOD.117	p.144, Policy AC2 – introductory text	<u>The emerging Key Route Network as highlighted in the West Midlands Strategic Transport Plan will be made up of main metropolitan roads - operating at agreed performance standards. This network will serve the main strategic demand flows of people and freight across the metropolitan area, and provide connections to the national strategic road network. It will also serve large local flows which use main roads and provide good access for businesses reliant on road based transport and will use highway capacity effectively to cater for movement by rapid transit and core bus routes, the Metropolitan Cycle Network, Heavy/Light Goods vehicles and private cars to support growth on key corridors.</u>	<i>Additional paragraph to provide further clarity to introductory text and strengthen links to Strategic Transport Plan.</i>

LP/MOD.118	p.145	<u>The model was also run to consider the total impacts of the growth planned within this Local Plan (by location) having specific regard to the impacts of the proposed SUE's. Finally, the The model has also been used to test the impact of potential growth in other local authority areas adjacent to the city, primarily in Warwickshire and Solihull and the impact this could have on the city's highways.</u>	<i>Reflects new evidence developed in support of the hearings.</i>
LP/MOD.119	p.146 – new bullet point 3	<u>Highway improvements at the A45, A46 and A444 to support improved access to Whitley Business Park. This will also include a new road bridge across the A45 to support access to the Whitley South development site (in Warwick District);</u>	<i>To reinforce the importance of strategic highway infrastructure supporting the wider Whitley development sites.</i>
LP/MOD.121	p.46 – text in support of Table 10.1	The <u>further modelling work which takes account of all Local Plan growth proposals and planned do something package of road infrastructure measures reduces delay in the network to 33%by 14% in the AM peak and 28%10% in the PM peak. This equates to a reduction of over 20%</u> when compared to only the do minimum scenario. Although total vehicle kilometres increase, the overall uplift in journey making is indicative of the improved connectivity across Coventry which will support increased economic growth and activity	<i>Reflects new evidence developed in support of the hearings.</i>
LP/MOD.122	p.150, Policy AC3 – introductory text	<u>Travel Plan support can be provided by the City Council and TfWM on the cheapest and most sustainable ways to travel including journey planning, ticket advice and any travel support.</u>	<i>Additional paragraph to add clarity to introductory text.</i>
LP/MOD.123	p.151, Policy AC3, para. 4	New development proposals which require changes to the highway network will be required to integrate with any existing UTMC and ITS infrastructure and strategy <u>and development of the Key Route Network</u>	<i>Additional wording to add clarity to policy.</i>
LP/MOD.124	p.152, Policy AC4 – introductory text	<u>The West Midlands Cycle Charter also aims to raise cycling levels, and deliver change. The charter sees cycling as playing an important role in addressing the challenges the West Midlands face, which include reducing congestion, carbon and pollution, supporting economic growth and employment, tackling obesity and creating places where people want to live, work, learn, shop and do business.</u> <u>The Cycle Charter also supports a Metropolitan Cycle Network which will be integrated with local cycle networks.</u> <u>High quality cycle parking should also be provided at new sites and along the wider</u>	<i>To satisfy Inspector Action Point 15 of Hearing Session 12.</i>

		<u>public transport network at interchanges and stations.</u>	
LP/MOD.125	p.155, Policy AC5 – introductory text	<p><u>Coventry's Bus Network Development Plan and bus policies as highlighted in the Strategic Transport Plan demonstrate the importance of a partnership approach with TfWM. This will be vital in providing high quality bus services to new developments.</u></p> <p>To ensure bus travel is an attractive and convenient option, new development <u>must comply with TfWM access standards and</u> will in most circumstances be expected to have access to a bus stop within 400m of the development site, with a regular service patterns of at least two buses per hour serving the city centre. It is accepted that this may not be practicable for small scale development proposals in more remote parts of the city <u>but developers will be encouraged to liaise with the Council and TfWM to ensure access standards are fully met.</u> For larger development sites, in particular those in more peripheral locations, it will be important that bus services are fully integrated into the <u>whole sites footprint</u> with provision made to accommodate appropriate bus infrastructure including bus shelters and passenger information. <u>Through routes for buses along with suitable bus priority measures should also be provided wherever possible and</u> Tthe Council will work in consultation with developers, bus operators, <u>TfWM</u> and the Passenger Transport Executive to achieve this.</p>	<i>To partly satisfy Inspector Action Point 7 of Hearing Session 10.</i>
LP/MOD.126	p.155, 156 + Figure 10.4, Policy AC5 – introductory text	<p>The West Midlands Strategic Transport Plan sets out a strategy for a core bus network which is closely integrated with a high frequency rail and Sprint rapid transit network to enhance connectivity to other strategic centres across the conurbation <u>West Midlands.</u></p> <p>The West Midlands Strategic Transport Plan sets out comprehensive network of SPRINT <u>rail and</u> rapid transit routes across the Metropolitan area including a SPRINT <u>new Rapid Transit</u> network for the Coventry area.</p>	Alteration of wording to correct terminology and provide clarity to introductory text.
LP/MOD.127	p.157, Policy AC5, para. 1-3	<p>New major development proposals should have safe and convenient access to the existing bus network <u>and comply with the TfWM access standards.</u></p> <p>The development of a mass rapid transit network will be supported to improve accessibility to existing and new major trip attractors.</p>	<i>To partly satisfy Inspector Action Point 7 of Hearing Session 10.</i>

		Further details will be set out in the Coventry Connected SPD, and the West Midlands Strategic Transport Plan <u>and Coventry's Bus Network Development Plan.</u>	
LP/MOD.128	p.159, Policy AC6 part 4	Further details are set out in the Coventry Connected SPD, and Coventry Rail Investment Strategy <u>and the West Midlands Strategic Transport Plan.</u>	Strengthens reference and links to the Strategic Transport Plan
LP/MOD.129	p.163, Policy EM1, para. f	<u>f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change.</u>	Additional point added to policy to add further clarity and respond to SOCG with the Environment Agency
LP/MOD.130	p.163, Policy EM2, para. 1	New development should be designed and constructed to meet the relevant Building Regulations, as a minimum, <u>with a view to:</u> and to sustainability standards <u>which:</u> <ul style="list-style-type: none"> a) Maximising<u>ing</u>e energy efficiency and the use of low carbon energy; b) Conserv<u>ing</u>e water and minimising<u>ing</u>e flood risk including flood resilient construction; c) Consider<u>ing</u>e the type and source of the materials used; d) Minimising<u>ing</u>e waste and maximising<u>ing</u>e recycling during construction and operation; e) Being<u>Are</u> flexible and adaptable to future occupier needs; and f) Incorporat<u>ing</u>e measures to enhance biodiversity value. 	<i>To satisfy Inspector Action Point 13 of Hearing Session 3, + Minor grammatical corrections.</i>
LP/MOD.131	p.164 + 165, Policy EM2, para. 3 and supporting text.	A Sustainable Buildings Statement should <u>te</u> demonstrate how the requirements of Climate Change policies in this Plan and any other relevant local climate change strategies have been met, <u>and consider any potential coal mining legacy issues including land stability.</u> <u>Consideration of the city's coal mining legacy should also be included within the Sustainable Building Statement having regard to maps and information published by the Coal Authority.</u>	<i>To satisfy Inspector Action Point 2 of Hearing Session 11.</i>
LP/MOD.132	p.165, Policy EM3 – supporting text	<u>As such Policy EM3 does not apply to any proposals for wind turbines or wind farms. Instead any such proposals will be considered in accordance with the most up to date national policy.</u>	<i>To satisfy Inspector Action Point 10 of Hearing Session 9.</i>

LP/MOD.133	p.166-168, Policy EM4	Fundamental alterations to policy in order for it to align with SOCG signed with the Environment Agency, most notably new parts 2, 3 and 4 with amendments to parts 1, 7 and 8. This responds to updates in national guidance since the Local Plan was published	<i>To satisfy Inspector Action Point 9 of Hearing Session 9.</i>
LP/MOD.134	p.168, Policy EM4 – supporting text	The Environment Agency has produced indicative flood zone maps for local and other watercourses, as well as surface water. The Council has undertaken a Stage level one and Stage level two Strategic Flood Risk Assessment (2015), which has provided the evidence to directly inform the allocation of land for new development over the plan period.	Deletion of text to improve clarity of supporting text, + Change of wording to correct terminology.
LP/MOD.135	p.169, Policy EM5, para. 1	All development must apply SuDS unless it can be clearly demonstrated there are practical reasons for not doing so and should ensure that surface water runoff is managed as close to its source as possible.	<i>To satisfy Inspector Action Point 11 of Hearing Session 9.</i>
LP/MOD.136	p.170, Policy EM5 – supporting text	In addition, the LLFA is a statutory consultee on all major planning applications and a consultee on a non-statutory basis on all minor applications whilst also advising and advises on the approval of all sustainable drainage and related systems, surface flooding and ground water for all planning applications.	Additional wording to add clarity to supporting text.
LP/MOD.137	p.170 + 171, Policy EM6 + supporting text	New Policy and associated supporting text which has been created to provide a focussed policy grouped around waste water and previously developed land. This responds to the SOCG with the Environment Agency and responds to updates in national guidance since the Local Plan was published.	<i>To satisfy Inspector Action Point 8 of Hearing Session 9.</i>
LP/MOD.138	p.172, Policy EM7, para. 1 + introductory text	<u>This is alongside the emerging 'West Midlands Metropolitan Transport Emissions Framework' which sets out transports role in tackling air quality issues and has proposed a range of policies.</u> Funded through the DEFRA Air Quality Grant, the aims of the LETCP <u>and West Midlands Transport Emissions Framework</u> are to: NB: Policy has been renumbered from EM6 to EM7 to accommodate new Policy. 1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality <u>and be in accordance with the West Midlands Transport</u>	<i>Additional wording to add clarity to both policy and associated supporting text, following the publication of a new guidance</i>

		<u>Emissions Framework and associated policies.-</u>	
LP/MOD.139	p.175, Policy EM8, Part 1, para. D	NB: Policy has been renumbered from Policy EM7 to EM8 to accommodate new Policy EM6 d) a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles; and	<i>To satisfy Inspector Action Point 1 of Hearing Session 11.</i>
LP/MOD.140	p.175, Policy EM8, para. e + f	<u>e) Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; an</u> <u>f) Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources.</u>	Additional wording to provide further clarity to policy.
LP/MOD.142	p.179, Policy EM9	Policy EM7 has been renumbered having previously been EM8.	This is to accommodate the new Policy EM6.
LP/MOP.143	p.179, Policy EM9 – supporting text	<u>The Council will continue to proactively work with its neighbours through joint working and collaborative efforts via the West Midlands Aggregate Working Party.</u>	To satisfy Inspector Action Point 3 of Hearing Session 11.
LP/MOD.144	p.179 + 180, New Policy EM10 + supporting text	<u>Policy EM10 Non Mineral Development in Mineral Safeguarding Areas</u> <u>All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.</u> Supporting Text: <u>The policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.</u> <u>This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The Policy also aims to ensure that development proposals within the Plan are</u>	<i>To satisfy Inspector Action Point 4 of Hearing Session 11.</i>

		<u>deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city. Within this location this has been further emphasised by the closure, and planned redevelopment of the Daw Mill Colliery, which would have provided the primary access point for the extraction of such reserves. Development identified within policies H2 and/or JE2 would not therefore be subject to this policy.</u>	
LP/MOD.145	p.187, Policy IM1 – introductory text	<u>Cycling and walking routes</u>	Additional wording to reflect other proposed changes.
LP/MOD.146	p.188, Policy IM1 – introductory text	<u>In addition, the City's IDP will be managed to reflect strategic cross boundary infrastructure that is to be delivered within Warwickshire but with a view to supporting the growth of the City (in part at least) and the delivery of the homes and employment land that have been redistributed through the Housing and Employment MOU's. This reflects the strategic importance of such infrastructure and the Councils on-going commitment to its Duty to Cooperate responsibilities with its neighbouring authorities.</u>	<i>Additional paragraph to add clarity to introductory text.</i>
LP/MOD.147	p.188, Policy IM1, para. 4	<u>This will focus primarily on category 1 infrastructure as identified in the IDP and/or Regulation 123 list.</u>	<i>To satisfy Inspector Action Point 10 of Hearing Session 3.</i>
LP/MOD.148	p.190, Implementation – supporting text	The Councils current 5 year housing land supply comprises 63 75% of homes which already have planning consent or have started construction (at April 2016 5). In addition, a further 15 22 % is covered by sites allocated under policy H2, adding further certainty to the delivery of these schemes and their supporting infrastructure. The remaining 10 45 % comprises sites within the SHLAA that are predominantly smaller sites within the existing urban area and which will have a lesser impact on infrastructure needs, with greater opportunity to access and utilise existing provisions.	Update of figures to include most recent data.
LP/MOD.149	p.192, Local and National Grant Funding – supporting text	<u>Indeed, the City Council are already progressing plans to invest money secured through the Devolution Deal as part of the West Midlands Combined Authority, including significant contributions towards rail and highway infrastructure.</u>	<i>Additional wording to include information which wasn't available at the time of publication of the draft document.</i>
LP/MOD.150	p.193, Duty to Cooperate – supporting text	<u>The County Council are also coordinating a compendium of infrastructure Plans across the sub-region to support the alignment of strategic growth areas and infrastructure provisions. This will be supported by the regular updating of the City Councils live IDP which will identify key cross boundary schemes linked to the</u>	<i>To satisfy Inspector Action Point 11 of Hearing Session 3.</i>

		<u>delivery of the city's unmet needs within Warwickshire.</u>	
LP/MOD.151	p.194, Monitoring and Performance – supporting text	<u>The Monitoring Framework will therefore be regularly reviewed and kept up to date. It will also be an integral evidence platform for determining the need to review the Plan, either in full or part, in accordance with Policy DS1.</u>	<i>To satisfy Inspector Action Point 5 of Hearing Session 16.</i>

City Centre AAP – Schedule of Proposed Modifications – November 2017

The table below lists both the minor and main modifications that have been undertaken for the City Centre Area Action Plan for varying reasons. Please note that only specific alterations have been listed, and changes to the formatting/layout or grammatical corrections have been considered as a single reference number – see AAP/MM.A and AAP.MM.B

<u>Modification Reference Number</u>	<u>Page Number / Policy Reference</u>	<u>Proposed Amendment</u>	<u>Justification and Reasoning</u>
MINOR MODIFICATIONS			
AAP/MM.A	Throughout AAP Document	All figure numbers in the AAP policies, supporting text and figure/table captions themselves, have been amended so that they are referenced accurately and consistently, and tables and figures are presented in numerical order. Where appropriate figure/table numbers have been changed to reflect this. This includes the correction of the typographical error relating to figures 18a and 18b, where instead they should read 17a and 17b.	Adjustment to figure numbers to ensure technical and presentation accuracy. Please see Inspector Action Point 12 of Hearing Session 12.
AAP/MM.B	Throughout AAP Document	The entire document has been reviewed in its entirety in order to ensure it is consistently formatted and presents correct grammar throughout. This includes minor changes such as spelling and grammatical corrections.	To ensure the document is presented professionally.
AAP/MM.1	p.4, para. 1.3	<u>In developing the AAP</u> The Council <u>undertook a range of consultation events and consulted on a preferred approach for the city centre between February and April 2015, which</u> built upon a range of previous work undertaken since 2009. This has included:	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
AAP/MM.2	p.4, para. 1.3	<ul style="list-style-type: none"> • 2015 – Consultation on the new City Centre Area Action Plan Preferred Approach • <u>2016-2017 – Consultation on the AAP Publication draft, examination hearings and consideration of modifications.</u> 	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.

AAP/MM.3	p.4, para. 1.3	As a result of these processes is consultation and the comments received the AAP has been modified and updated to produce this <u>final</u> version of the document, <u>which will be adopted by the City Council in 2017.</u> The Proposed Publication Draft.	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
AAP/MM.4	p.4, para. 1.4	This version of the plan will be subject to a statutory period of 6 weeks public engagement starting on Monday 18th January 2016. During this period stakeholders will have the opportunity to submit representations relating to the plans soundness and legal compliance.	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
AAP/MM.5	p.4, para. 1.5	Following this period of public engagement the plan will be submitted to the Secretary of State, who will appoint an independent Planning Inspector to decide whether or not to approve the plan with or without changes. This will involve the holding of an "Examination in Public" which is expected to be in summer 2016. Subject to the Inspector's conclusions the plan could then be adopted by the end of 2016.	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
AAP/MM.6	p.5, para. 1.6	The new version of the AAP has been developed alongside updates to the evidence base and the City's new Local Plan.	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
AAP/MM.7	p.6, para. 2.1	Despite this period of successful redevelopment activity, it has been more than 154 years since these policies were written and as such they have become dated, with many of the key policy aims and objectives now implemented or superseded.	Factual correction to provide up-to-date figures which acknowledge a progression in the plan.

AAP/MM.8	p.7, para. 2.3	As the Council have developed the Local Plan over the last 18 months , the AAP has been developed in parallel in order to help the AAP be steered by the Local Plan and to help the 2 documents guide and promote development in tandem. This has allowed a holistic development of local planning policy for Coventry to 2031 for the next 15 years and supports the identification of the city centre as the heart of the city and the focal point for new jobs, homes and investment.	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage + Alteration to wording to support figure accuracy/provide up-to-date figures which acknowledge a progression in the plan.
AAP/MM.15	p.14, para. 4.11	Included within the comparison floor space provision up to 2031 is an allowance for just under 228,000sq.m gross of retail warehouse floor space, which the study suggests should be directed to the city centre, where this is considered appropriate.	Alteration to wording to add clarity + Factual correction to figures.
AAP/MM.17	p.15, para. 5.1	The creation of good quality green and blue infrastructure;	Addition to wording to ensure consistency with amended Policy CC1.
AAP/MM.18	p.18, para. 8.1	The Council's Historic Environment Record (Including the Gould Report (2009) and Conservation Area Appraisals).	Addition to wording to add clarity.
AAP/MM.19	p.18, para.9	Community and Stakeholder Engagement This document provides the next step in delivering a new City Centre Area Action Plan for Coventry. Its continued progress however requires the views and opinions from the people of Coventry, local businesses and other interested Stakeholders. As such, this document is being published for a statutory period of 6 weeks public engagement. It will begin on Monday 18th January 2016, and run for 6 weeks until Monday 29th February 2016. This period of community and stakeholder engagement will be undertaken in accordance with the Council's	Section deleted as to prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.

		<p>adopted Statement of Community Involvement (SCI).</p> <p>As part of the process specific events will be held across the city with local communities and key stakeholders to help the Council understand areas of support and challenge prior to submitting the plan to the Planning Inspectorate.</p> <p>A Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) has been undertaken, and has been used to help shape this document and its proposals. It is available to view as part of the supporting documents released by the Council that relate to this period of engagement on the now AAP. In addition the plan is supported by a Health Impact Assessment and Equalities and Consultation Assessment. These are all available to view on the Council's webpages www.coventry.gov.uk/aap</p> <p>All responses should be submitted to the Council by 5pm on the 29th February 2016 and should preferably be submitted via email to: localplan@coventry.gov.uk</p> <p>Alternatively written responses can be submitted to the following address:</p> <p>Coventry City Council Planning Policy Department Floor 3, Civic Centre 4 Much Park Street, Coventry CV1 2PY</p> <p>Or, deposited at local libraries or council offices for the attention of the Council's Planning Policy team at the above address.</p>	
AAP/MM.25	p.36, supporting text	<p>An alternative to deculverting could be a recreation or representation of the river channel, which could help form part of a Sustainable Urban Drainage System (SuDS). Although some SuDS features are not always appropriate in areas of ground contamination, Opportunities should be taken to explore these within the city centre, not only around Fairfax Street and Palmer Lane but the centre as a whole.</p>	Correction of wording to accurately reflect acronym and aid clarity.

AAP/MM.26	p.36, supporting text	In the national context the risk of major scale flooding in Coventry <u>City Centre</u> is low.	Additional wording to add clarity of the supporting text.
AAP/MM.27	p.36, supporting text	Local flooding is becoming increasingly common due to the impacts of climate change on weather patterns and it is important to address this risk in Coventry. Historically, flood risk management has concentrated on high impact and often low frequency flood events.	Deletion of unnecessary wording.
AAP/MM.31	p.39, supporting text	Any new development or redevelopment of existing sites within the city centre will require an investigation into the quality of the underlying soils and waters and where necessary an appropriate level of remediation to ensure the land is fit for its proposed use and will not pose a risk to future users of the site <u>or the environment</u> .	Additional words to add clarity to supporting text.
AAP/MM.34	p.46, supporting text	Further guidance can be found in the West Midlands Low Emission Towns and Cities guidance <u>and within the emerging West Midlands Metropolitan Area Transport Emissions Framework</u> = on electric vehicle recharging standards and will be provided in the Coventry Connected Transport Strategy SPD.	Additional wording to add clarity to supporting text.
AAP/MM.41	p.51, supporting text	Additional reference added to the end of the Accessible car Parks section of supporting text: <u>High quality, secure cycle parking and motorbike parking should also be considered.</u>	Additional wording to aid clarity of supporting text.
AAP/MM.46	p. 60, para. 3	Ensure reference is made to “The Burgess” as opposed to just “Burgess”	Technical correction of street naming.
AAP/MM.49	p.81, Policy CC18, Primary Shopping Area – supporting text	The Shopping and Centres Study recommends that the city centre should be the focal point for new retail provision across Coventry and should accommodate up to approximately at least 78,100sq.m of gross new floor space up to 2031. This should include a range of retail needs (A1-A5) and be phased in accordance with Table <u>3 of this AAP</u> 5 below .	Additional wording to aid clarity of supporting text and make phrasing more accurate.

MAIN MODIFICATIONS

AAP/MM.9	p.8, para. 3.4	<p>Table 1 below highlights the number of new homes built in the city centre in the last 10 years. This represents just below <u>approximately</u> 15% of all completions in Coventry <u>over that period</u>.</p>	<p>Alteration to wording to support figure accuracy and add clarity.</p>
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AAP/MM.10	p.8, Table 1	<p>Table 1: Completion of new homes in Coventry city centre 2006-2016</p> <table border="1"> <thead> <tr> <th><u>Year</u></th> <th><u>06/07</u></th> <th><u>07/08</u></th> <th><u>08/09</u></th> <th><u>09/10</u></th> <th><u>10/11</u></th> <th><u>11/12</u></th> <th><u>12/13</u></th> <th><u>13/14</u></th> <th><u>14/15</u></th> <th><u>15/16</u></th> <th><u>Total</u></th> </tr> </thead> <tbody> <tr> <td><u>Total Completions (net)</u></td> <td><u>1,165</u></td> <td><u>1,149</u></td> <td><u>680</u></td> <td><u>496</u></td> <td><u>705</u></td> <td><u>921</u></td> <td><u>994</u></td> <td><u>1,095</u></td> <td><u>1,116</u></td> <td><u>1,436</u></td> <td><u>9,757</u></td> </tr> <tr> <td><u>Within City Centre</u></td> <td><u>156</u></td> <td><u>0</u></td> <td><u>28</u></td> <td><u>97</u></td> <td><u>195</u></td> <td><u>137</u></td> <td><u>152</u></td> <td><u>229</u></td> <td><u>119</u></td> <td><u>310</u></td> <td><u>1,423</u></td> </tr> <tr> <td><u>Outside City Centre</u></td> <td><u>1,009</u></td> <td><u>1,149</u></td> <td><u>652</u></td> <td><u>399</u></td> <td><u>529</u></td> <td><u>784</u></td> <td><u>842</u></td> <td><u>866</u></td> <td><u>997</u></td> <td><u>1,136</u></td> <td><u>8,363</u></td> </tr> <tr> <td><u>% within City Centre</u></td> <td><u>13%</u></td> <td><u>0%</u></td> <td><u>4%</u></td> <td><u>20%</u></td> <td><u>28%</u></td> <td><u>15%</u></td> <td><u>15%</u></td> <td><u>21%</u></td> <td><u>11%</u></td> <td><u>22%</u></td> <td><u>15%</u></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th><u>Year</u></th> <th><u>05/06</u></th> <th><u>06/07</u></th> <th><u>07/08</u></th> <th><u>08/09</u></th> <th><u>09/10</u></th> <th><u>10/11</u></th> <th><u>11/12</u></th> <th><u>12/13</u></th> <th><u>13/14</u></th> <th><u>14/15</u></th> <th><u>Total</u></th> </tr> </thead> <tbody> <tr> <td><u>Total Completions (net)</u></td> <td><u>691</u></td> <td><u>1,165</u></td> <td><u>1,149</u></td> <td><u>680</u></td> <td><u>496</u></td> <td><u>705</u></td> <td><u>921</u></td> <td><u>994</u></td> <td><u>1,095</u></td> <td><u>1,116</u></td> <td><u>9,012</u></td> </tr> <tr> <td><u>Within City Centre</u></td> <td><u>148</u></td> <td><u>156</u></td> <td><u>0</u></td> <td><u>28</u></td> <td><u>97</u></td> <td><u>195</u></td> <td><u>137</u></td> <td><u>152</u></td> <td><u>229</u></td> <td><u>119</u></td> <td><u>1,261</u></td> </tr> <tr> <td><u>Outside City Centre</u></td> <td><u>543</u></td> <td><u>1,009</u></td> <td><u>1,149</u></td> <td><u>652</u></td> <td><u>399</u></td> <td><u>529</u></td> <td><u>784</u></td> <td><u>842</u></td> <td><u>866</u></td> <td><u>997</u></td> <td><u>7,751</u></td> </tr> <tr> <td><u>% within City Centre</u></td> <td><u>21%</u></td> <td><u>13%</u></td> <td><u>0%</u></td> <td><u>4%</u></td> <td><u>20%</u></td> <td><u>28%</u></td> <td><u>15%</u></td> <td><u>15%</u></td> <td><u>21%</u></td> <td><u>11%</u></td> <td><u>14%</u></td> </tr> </tbody> </table>	<u>Year</u>	<u>06/07</u>	<u>07/08</u>	<u>08/09</u>	<u>09/10</u>	<u>10/11</u>	<u>11/12</u>	<u>12/13</u>	<u>13/14</u>	<u>14/15</u>	<u>15/16</u>	<u>Total</u>	<u>Total Completions (net)</u>	<u>1,165</u>	<u>1,149</u>	<u>680</u>	<u>496</u>	<u>705</u>	<u>921</u>	<u>994</u>	<u>1,095</u>	<u>1,116</u>	<u>1,436</u>	<u>9,757</u>	<u>Within City Centre</u>	<u>156</u>	<u>0</u>	<u>28</u>	<u>97</u>	<u>195</u>	<u>137</u>	<u>152</u>	<u>229</u>	<u>119</u>	<u>310</u>	<u>1,423</u>	<u>Outside City Centre</u>	<u>1,009</u>	<u>1,149</u>	<u>652</u>	<u>399</u>	<u>529</u>	<u>784</u>	<u>842</u>	<u>866</u>	<u>997</u>	<u>1,136</u>	<u>8,363</u>	<u>% within City Centre</u>	<u>13%</u>	<u>0%</u>	<u>4%</u>	<u>20%</u>	<u>28%</u>	<u>15%</u>	<u>15%</u>	<u>21%</u>	<u>11%</u>	<u>22%</u>	<u>15%</u>	<u>Year</u>	<u>05/06</u>	<u>06/07</u>	<u>07/08</u>	<u>08/09</u>	<u>09/10</u>	<u>10/11</u>	<u>11/12</u>	<u>12/13</u>	<u>13/14</u>	<u>14/15</u>	<u>Total</u>	<u>Total Completions (net)</u>	<u>691</u>	<u>1,165</u>	<u>1,149</u>	<u>680</u>	<u>496</u>	<u>705</u>	<u>921</u>	<u>994</u>	<u>1,095</u>	<u>1,116</u>	<u>9,012</u>	<u>Within City Centre</u>	<u>148</u>	<u>156</u>	<u>0</u>	<u>28</u>	<u>97</u>	<u>195</u>	<u>137</u>	<u>152</u>	<u>229</u>	<u>119</u>	<u>1,261</u>	<u>Outside City Centre</u>	<u>543</u>	<u>1,009</u>	<u>1,149</u>	<u>652</u>	<u>399</u>	<u>529</u>	<u>784</u>	<u>842</u>	<u>866</u>	<u>997</u>	<u>7,751</u>	<u>% within City Centre</u>	<u>21%</u>	<u>13%</u>	<u>0%</u>	<u>4%</u>	<u>20%</u>	<u>28%</u>	<u>15%</u>	<u>15%</u>	<u>21%</u>	<u>11%</u>	<u>14%</u>	<p>Alteration to date range to provide up-to-date figures + Provide up-to-date figures which acknowledge a progression in the plan.</p>
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AAP/MM.11	p.8, para. 3.5	<p>This has included a number of purpose built student accommodation developments around the Ring Road and conversions of former offices. In the last 132 years such developments have delivered in excess of 3,4002,900 new bed spaces within the city centre, of which more than a third have been completed this decade. In terms of conversion opportunities these have completed in excess of 800450 bed spaces in the last 65 years at sites such as <u>the former AXA towers</u>, Market Way and Trinity Street.</p>	<p>Additional text to provide further detail, Factual corrections to figures. + Provide up-to-date figures which acknowledge a progression in the plan.</p>												
AAP/MM.12	p.10, Policy CC1	<ul style="list-style-type: none"> • <u>Providing an attractive and safe environment for pedestrians, cyclists and motorists;</u> • <u>Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</u> • Continuing to generate a balance and integration of the university with the wider city centre<u>support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan; and</u> • <u>Recognising and preserving key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch; and</u> • <u>Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</u> 	<p>Change/addition of wording for clarification purposes/ grammatical correction + <i>To satisfy Inspector Action Point 4 of Hearing Session 12.</i></p>												
AAP/MM.13	p.13, para. 4.9	<p>With this in mind the Shopping and centres study recommends the provision of around 1076,000sq.m of gross new floor space across Coventry up to 2031, which covers a range of retail needs. Of this <u>up to</u> approximately 798,000sq.m is to be delivered within the city centre (of which 9,600sqm is to be set aside to cover excessive level of vacant units).</p>	<p>Factual correction to figures + Alteration to wording to add clarity.</p>												
AAP/MM.14	p.13, Table 3	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #ADD8E6;"> <th></th> <th style="text-align: center;">2014-2021</th> <th style="text-align: center;">2021-2031</th> <th style="text-align: center;">Total 2011-2031</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Total Convenience Retail floor space</td> <td style="text-align: center;">0</td> <td style="text-align: center;">10,000</td> <td style="text-align: center;">10,000</td> </tr> <tr> <td style="text-align: center;">Total Other Retail floor space</td> <td style="text-align: center;">21,811</td> <td style="text-align: center;">46,323</td> <td style="text-align: center;">68,134</td> </tr> </tbody> </table>		2014-2021	2021-2031	Total 2011-2031	Total Convenience Retail floor space	0	10,000	10,000	Total Other Retail floor space	21,811	46,323	68,134	<p>Figures shown in greater detail, and subsequent alteration to footnotes to reflect change. <i>To satisfy Inspector Action</i></p>
	2014-2021	2021-2031	Total 2011-2031												
Total Convenience Retail floor space	0	10,000	10,000												
Total Other Retail floor space	21,811	46,323	68,134												

Total retail floor space (all forms)	21,811	56,323	78,134
% in timeframe	28%	72%	100%
=	<u>To 2021</u>	<u>2021-2031</u>	<u>Total 2011-2031</u>
<u>Total Convenience Retail floor space*</u>	<u>0</u>	<u>10,000</u>	<u>10,000</u>
<u>Total Comparison Retail floor space (A1)**</u>	<u>10,162</u>	<u>17,505</u>	<u>27,667</u>
<u>Total A2 floor space***</u>	<u>3,189</u>	<u>6,523</u>	<u>9,712</u>
<u>Total A3-A5 floor space</u>	<u>7,035</u>	<u>2,975</u>	<u>10,010</u>
<u>Total Retail Warehousing floor space***</u>	<u>2,425</u>	<u>19,333</u>	<u>21,758</u>
<u>Total***</u>	<u>22,811</u>	<u>56,336</u>	<u>79,147</u>

*-An allowances for 9,600sq,m for the occupation of vacant floor space should be considered against the short term need. It is not deducted from the above table.

** Target figure as specific city centre convenience figure could not be extracted from the NLP study.


** An allowance for at least 10,000sq,m of new retail floor space at City Centre South has been added into the short term projection.

***total figures for A2 floor space and Retail Warehousing and total floor space are reflective of all A2 provision and Retail Warehousing being delivered within the city centre as outlined in Table 5.1 of the Local Plan"

NB; An allowances for 9,600sq,m for the occupation of vacant floor space should be considered against the short term need. It is not deducted from the above table.

Point 4 of Hearing Session 7B (retail) and Inspector Action Point 10 of Hearing Session 12.

		<u>NB: all figures are for gross floor space</u>	
AAP/MM.16	p.14, para. 4.11	<u>A similar approach is taken with A2 provision which accounts for up to approximately 9,700sq.m. If this does not prove possible through the Sequential Assessment process then provisions should be focused towards the other centres within the retail hierarchy as appropriate (see policy R3 of the Local Plan).</u>	Further detail to supporting text.
AAP/MM.20	p.20, Policy CC2, City Centre Heritage - supporting text	<p><u>In partnership with Historic England, the City Council will continue to undertake further research into the City's post-war buildings, spaces and places (particularly within the City Centre). Alongside other relevant evidence this will be applied to inform further statutory and local building and area designations and future master planning work with partners such as the University.</u></p> <p><u>This will continue to demonstrate a commitment to a positive, proactive and on-going approach to the conservation of Coventry's cultural heritage, ensuring that the significance of the historic environment is fully appreciated and its potential is harnessed and integrated with the Council's aspirations for regenerating the City Centre.</u></p> <p><u>As such, the City Council will continue to update its local list to respond to evolving evidence and research. This reflects the 'live' nature of the Local List. It will also provide an opportunity to continue to identify heritage assets of local importance to be appreciated and safeguarded, which may not merit statutory recognition.</u></p> <p><u>This evidence will also be used to determine the suitability of further Conservation Area designation(s) and boundary revisions across the city centre. It will also support the city centres Heritage Action Zone status.</u></p>	<p>Additional supporting text to the Heritage chapter as agreed with Historic England through Statement of Common Ground.</p> <p><i>To satisfy Inspector Action Points 2 and 3 of Hearing Session 12.</i></p>
AAP/MM.21	p. 21, Policy CC2, para. a.+b.	<p>All development within, or affecting the setting of, a Conservation Area (as highlighted in Figure 2) shall preserve and enhance its character and appearance and adhere to the policies of the relevant Conservation Area Appraisal and Management Plan.</p> <p>All development relating to or in close proximity to heritage assets such as statutory and locally listed buildings, Scheduled Monuments, public artwork and non-designated heritage assets (Figure 2) shall be undertaken sympathetically to those heritage assets and seek to preserve and enhance their setting.</p>	<p>Clarification to Policy CC2.</p> <p><i>To satisfy Inspector Action Point 1 of Hearing Session 12.</i></p>


AAP/MM.22	p.23, Figure 3		Minor cartographical amendments to provide the most up to date map.
AAP/MM.23	p.33, supporting text	<p>As part of this process, the provision of soft landscaping, including tree planting to promote biodiversity and create a visually attractive environment will be promoted. 'Greening' of the Ring Road will also be supported where highway safety is unaffected through the introduction of vertical planting such as green walls and climber structures to supporting walls and bridges in order to enhance the appearance of the city centre and to offer screening opportunities. <u>Furthermore, opportunities to deculvert or 'day-light' and restore the River Sherbourne and its tributaries will be supported in principle.</u></p>	<p>Additional supporting text to the Green and Blue Infrastructure chapter to clarify Council's position.</p> <p><i>To partly satisfy Inspector Action Points 7 and 8 of Hearing Session 12.</i></p>


AAP/MM.24	p. 34, Policy CC8, para. a.	<p>New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. <u>Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.</u></p>	Additional supporting text to satisfy Inspector Action Point 5 of Hearing Session 12.
AAP/MM.28	p.37, Policy CC9, para. a.	<p>Development shall be designed and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Urban-Drainage methods shall be incorporated into new developments including treatment for water quality. <u>Such provisions should consider opportunities to reflect the alignment of the River Sherbourne and/or its tributaries.</u></p>	Technical correction to SuDs and additional wording in Policy CC9 to satisfy Inspector Action Point 9 of Hearing Session 12.
AAP/MM.29	p.37, Policy CC9, para. c.	<p>This includes all sites being treated as a Greenfield site when calculating permissible discharge rates <u>in line with Policy EM5 of the Local Plan.</u></p>	Additional wording in Policy CC9 to satisfy Inspector Action Point 6 of Hearing Session 12.
AAP/MM.30	p.37, Policy CC9, para. e.	<p>Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should <u>also be given to removing water bodies from culverts wherever possible and viable (having regard to Figure 6). This will be of particular importance along Fairfax Street as shown in Figure 7 in order to and will be vital to create multi-functional green and blue spaces within the city centre.</u> or consider opportunities to create a water channel that respects the alignment of the River Sherbourne.</p>	Alterations to wording to add clarity and make grammatical sense.
AAP/MM.32	p.42, Policy CC11, Accessibility - supporting text	<p><u>Coventry City Council have also worked in partnership with Transport for the West Midlands (TfWM) on the Strategic Transport Plan for the West Midlands Metropolitan Area "Movement for Growth". This sets out the overarching transport strategy for the West Midlands Metropolitan area covering metropolitan rail and rapid transit networks, the key route network and a metropolitan strategic cycle network, to help deliver a transport network which boosts our economy and improves reliability and the environment.</u></p>	Additional paragraph in supporting text to satisfy Inspector Action Point 17 of Hearing Session 12.

AAP/MM.33	p.45, Policy CC11, Walking and Cycling - supporting text	<p><u>Walking and cycling routes should also be connected to new development sites and link to the existing public transport network, interchanges and stops to deliver seamless integration. Routes should also connect to the TfWM future Metropolitan Strategic Cycle Network, as set out in the Strategic Transport Plan.</u></p>	Additional paragraph in supporting text to help satisfy Inspector Action Points 15 and 16 of Hearing Session 12.
AAP/MM.35	p.46, Policy CC11, Public Transport - supporting text	<p><u>Rail services</u> <u>Coventry station is an increasingly important strategic gateway into the city centre catering for well over five million business, leisure and educational trips into the city centre each year with these figures continuing to grow. A masterplan has been developed for the station area, and this will see the creation of new entrances combined with improved linkages on to Warwick Road and improved transport interchange linked to a new cycle parking hub. The Council will continue to engage with the rail industry to secure improved rail connectivity, in accordance with its rail strategy, to secure improved services which will support economic growth objectives.</u></p> <p><u>As more people use Coventry station to leave Coventry than arrive – and vice-versa in the evening, it is important that access to the station is sufficiently robust to sustain the continued growth in passenger numbers and future schemes support this like the station interchange.</u></p>	Movement of text to place greater emphasis on rail facilities – reflects consultation response from TfWM.
AAP/MM.36	p.46, Policy CC11, Public Transport, Bus Services – supporting text	<p><u>TfWM are currently developing ‘Bus Network Development Plans’ encompassing how the bus network will evolve over the next 20 years. Coventry’s Bus Network Plan will be based upon high level land use changes and will help support future city centre development and growth.</u></p> <p><u>A Key Route Network of main roads together with appropriate measures to support development including intelligent mobility schemes and priority measures to support reliable bus journey times on key routes will be developed in partnership with TfWM.</u></p>	Additional paragraphs as recommended by Inspector through Action Point 17 of Hearing Session 12.
AAP/MM.37	p.47, supporting text	<p>Pool Meadow bus station is expected to continue playing a role in providing a hub for local and <u>regional</u> national bus services as well <u>as some possible</u> as coach services, however its role in the longer term will need to be reviewed <u>in partnership with TfWM</u> in the context of:</p>	Additional wording to aid clarity of supporting text.

AAP/MM.38	p.47, Policy CC11, Public Transport – supporting text	<p><u>Rapid Transit</u></p> <p><u>It is important to invest in infrastructure which provides faster and reliable journeys across the West Midlands Metropolitan area. This will provide better and more sustainable access to jobs, education, healthcare facilities and leisure for all residents and visitors.</u></p> <p><u>The vision is for a network of Rapid Transit routes to run on suitable lines as part of one single network and be fully integrated with national and regional rail services, local bus services, passenger information, promotion and ticketing.</u></p> <p><u>It will be important to plan positively for the preferred rapid transit routes which will serve the city centre and all routes should be guided by the appropriate standards from TfWM. This will help to ensure combination of highway and other measures to provide an attractive alternative to the private car and ensure sustainable development. Rapid transit vehicles may also be longer than conventional public transport vehicles and may therefore require additional kerb space, which should also be taken into account when developments come forward – in particular the interchange at the rail station.</u></p> <p><u>The road network within the core of the city also needs to consider the operation of these vehicles in terms of manoeuvring and the opportunity to offer cross-city connectivity.</u></p>	Additional sub-section added to supporting text to ensure consistency with Local Plan approach to rapid transit, support the Plans joint approach to modal shift and better reflect Strategic Transport Plan objectives.
AAP/MM.39	p.48, supporting text	This will include the rationalisation of existing road signs and the <u>continued</u> introduction of <u>“intelligent”</u> reactive variable message signing on the main arterial routes and ring road <u>to guide visitors to the most appropriate parking spaces.</u>	Additional wording to aid clarity of supporting text.
AAP/MM.40	p.49, Policy CC11, Car Parking – supporting text	<p><u>Consideration should also be made to parking standards in new development in relation to the levels of public transport accessibility and walking and cycling provision as in the Strategic Transport Plan.</u></p> <p><u>The role of park and ride will also play a role in supporting Coventry city centre by increasing access to the metropolitan rail and rapid transit network.</u></p>	Additional paragraph to make explicit reference to car parking standards and strengthen references to Strategic Transport Plan.

AAP/MM.42	p.51 + 52, Policy CC11, para. b + c.	<p>Development proposals should support the needs of pedestrians and cyclists by incorporating new dedicated safe and direct pedestrian and cycle routes which integrate seamlessly into established networks <u>including connecting to the public transport network, interchanges and stops to deliver seamless integration together with provision of high quality cycle parking.</u></p> <p><u>City centre cycling and walking routes should be connected to the wider Metropolitan Strategic Cycle Network and be in partnership with TfWM.</u></p>	Addition of paragraph and additional wording to policy to satisfy Inspector Action Point 16 of Hearing Session 12.
AAP/MM.43	p.52, Policy CC11, part d.	Add additional bullet point to reflect - <u>The development of Rapid Transit.</u>	Additional wording to aid clarity of policy and better reflect Strategic Transport Plan objectives.
AAP/MM.44	p.52, Policy CC11, part e	Extend final bullet point as follows: <u>Changes should have regard to other relevant policies including the Coventry Connected SPD, and Coventry Car Parking Strategy and TfWM Strategic Transport Plan parking policy objectives, including any future metropolitan wide parking strategy. Parking needs and the role of the car will also be balanced with promoting the use of public transport, cycling and walking.</u>	Additional wording to add clarity to policy and better reflect Strategic Transport Plan objectives.
AAP/MM.45	p. 57, Policy CC12, para. C.	c. The provision of up to 20,500sq.m of A1-A5 retail <u>based</u> floor space will be allowed as part of mixed use buildings and to support the creation of active frontages. Any individual unit should not exceed 500sq.m gross and should not be of a scale that would cause inappropriate competition with the Primary Shopping Area.	To ensure consistency of policy approach across both the Local Plan and AAP.
AAP/MM.47	p.64, Policy CC14, The Civic Area – supporting text	<u>This will need to give specific consideration to the Council's evolving HER in order to reflect the heritage and conservation value of the area.</u>	Additional wording to add clarity to the supporting text. <i>Also to satisfy Inspector Action Point 3 of Hearing Session 12.</i>

<p>AAP/MM.48</p>	<p>p.79, Figure 16</p>		<p>Ensures map includes the most up to date designations.</p>																				
<p>AAP/MM.50</p>	<p>p.81, Table 5</p>	<p>Table 5: Retail Needs in Coventry City Centre (2014 – 2031)</p> <table border="1" data-bbox="595 611 1816 970"> <thead> <tr> <th></th> <th>2014-2021</th> <th>2021-2031</th> <th>Total 2011-2031</th> </tr> </thead> <tbody> <tr> <td>Total Convenience Retail floor space</td> <td>0</td> <td>10,000</td> <td>10,000</td> </tr> <tr> <td>Total Other Retail floor space</td> <td>21,811</td> <td>46,323</td> <td>68,134</td> </tr> <tr> <td>Total retail floor space (all forms)</td> <td>21,811</td> <td>56,323</td> <td>78,134</td> </tr> <tr> <td>% in timeframe</td> <td>28%</td> <td>72%</td> <td>100%</td> </tr> </tbody> </table> <p>* An allowances for 9,600sq.m for the occupation of vacant floor space should be considered against the short term need. It is not deducted from the above table.</p> <p>** An allowance for approximately 10,000sq.m of new retail floor space at City Centre South has been added into the short term projection.</p> <p>NB; all figures are for gross retail floor space but are not of any demolition/existing provision</p> <p>NB: Source: Coventry Shopping and Centres Study (2014)</p>		2014-2021	2021-2031	Total 2011-2031	Total Convenience Retail floor space	0	10,000	10,000	Total Other Retail floor space	21,811	46,323	68,134	Total retail floor space (all forms)	21,811	56,323	78,134	% in timeframe	28%	72%	100%	<p>Movement of table to be incorporated in Table 3 so as to satisfy Inspector Action Point 11 of Hearing Session 12.</p>
	2014-2021	2021-2031	Total 2011-2031																				
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AAP/MM.51	p.83, Policy CC18, para. b.	This area is expected to accommodate at least 40,000sq.m of gross new floor space up to 2031, covering a range of retail needs (A1-A5) <u>in accordance with Table 3 of this AAP.</u>	Additional wording to provide a link back to Table 3, to satisfy Inspector Action Point 13 of Hearing Session 12.
AAP/MM.52	p.87, Table 17a		Ensures map includes the most up to date designations.
AAP/MM.53	p.97, Policy CC24, para. b. + d.	<p>b. Land to the east of The Computer and Engineering Building on Gulson Road (1) will be allocated for the development of new building(s) to support this faculty or an alternative faculty. A large innovatively designed <u>High quality</u> building(s) will be supported on the site.</p> <p>d. Proposals to bring the Grade I listed Whitefriars Monastery (3) into appropriate and regular use will be strongly supported subject to that use not having a detrimental impact upon the architectural and historic interest of the building <u>and surrounding public realm.</u> <u>Proposals shall respect the design unity of this part of the University and Enterprise area.</u></p>	Addition and alteration to wording to aid clarity of policy.
AAP/MM.54	p.102, Policy CC25, para. c.	Where practicable, g <u>Green and blue infrastructure should form an integral part of all development proposals within these areas.</u> <u>This should include the consideration of deculverting where possible and viable</u>	Additional wording to satisfy Inspector Action Point 8 of Hearing Session 12.

AAP/MM.C	p.109, Indicators and Targets	For amendments to the indicators and targets for each policy of the AAP, please see Appendix 2: Monitoring Framework of the City Centre Area Action Plan, where modifications have been undertaken as necessary.	
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Cabinet
Council

28 November 2017
05 December 2017

Name of Cabinet Member:

Cabinet Member for Policing and Equalities - Councillor Khan
Cabinet Member for Community Development - Councillor Bigham

Director Approving Submission of the report:

Deputy Chief Executive (People)

Ward(s) affected:

All

Title:

MiFriendly Cities - Successful Award of funds under EU Urban Innovative Actions Fund

Is this a key decision?

Yes as it has the potential to impact on all wards within the City and expenditure is in excess of £1m.

Executive Summary:

A partnership led by the City Council and Coventry University has been successfully awarded €4.28m (£ 3.8m) in funding to deliver the innovative MiFriendly Cities initiative in Coventry and across the West Midlands.

The MiFriendly Cities project aims to facilitate and recognise the positive contribution of refugees and migrant's to the cities civic, economic and social fabric. Refugees and migrants are key factors in deciding what makes a "migrant friendly city" and driving the change on job creation, social entrepreneurship & innovation, active citizenship and communication.

The City Council will work in a regional partnership with Birmingham and Wolverhampton local authorities, the West Midlands Combined Authority (WMCA) as well as Coventry University (including its social enterprise hub), Interserve, Migrant Voice, Migrant Work, Refugee and Migrant Centre for Birmingham and the Black Country. Locally the Council will work closely with Coventry Refugee and Migrant Centre, Coventry Law Centre and the wider Coventry Migration Network of voluntary and community sector partners.

Recommendations:

The Cabinet are requested to:

- 1) Note the success of the partnership work between the City Council and Coventry University and other West Midlands partners in developing the MiFriendly Cities initiative.

- 2) Recommend that Council approve acceptance of a grant in excess of £2.5m in relation to the Urban Innovation Actions fund, authorise the City Council to act as accountable body and guarantor for the available funds and delegate authority to the Deputy Chief Executive (People) to enter into the appropriate grant aid agreements with project partners.

Council are requested to:

- 1) Approve acceptance of a grant in excess of £2.5m in relation to the Urban Innovation Actions fund, authorise the City Council to act as accountable body and guarantor for the available funds and delegate authority to the Deputy Chief Executive (People) to enter into the appropriate grant aid agreements with project partners.

List of Appendices included:

None

Background papers:

None

Other useful documents

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 – 5 December 2017

1. Context (or background)

- 1.1. A partnership led by the City Council and Coventry University has been successfully awarded €4.28m (£3.8m) in EU funding to better facilitate the integration and engagement of refugees and migrants in the City and across the West Midlands. The funding will support a series of projects improving skills, raising awareness of rights and responsibilities and providing volunteering opportunities. Refugees and migrants will be supported to create social enterprises and the City will gain additional physical capacity for Coventry Refugee and Migrant Centre to provide services and host community events.
- 1.2. In 2015 the EU identified the Urban Innovative Actions (UIA) fund of €371m to facilitate experimentation and innovation in creating potential solutions for the problems experienced by cities managing increased expectations with reduced funding. The fund describes itself as “the urban lab of Europe”.
- 1.3. MiFriendly Cities has been successful as part of the second wave of approved projects. Bids were invited across a range of topics with a specific request for proposals which related to the integration of migrants and refugees into local communities. 16 projects in total are included in the second wave with MiFriendly Cities being one of only 3 successful projects focusing on the integration of refugees and migrants. The fund will run until 2020.
- 1.4. A particular emphasis of the UIA is the measurability and transferability of the learning from different projects and a key component is the requirement for strong partnerships with an emphasis on collaboration between local authorities, universities and non-governmental organisations (NGOs).
- 1.5. Participation in this programme presents an opportunity to further enhance the City’s reputation as an International City of Peace and Reconciliation and to contribute to the City’s priorities in particular work to create active communities and empowering citizens, protecting the most vulnerable residents in the City and reducing the impact of poverty. Additionally this work will contribute to the Council meeting its statutory duties to promote equality of opportunity to employment and to promote community cohesion.

2. Options considered and recommended proposal

- 2.1. There remains an option to decline the offer of funding for the MiFriendly Cities project. This has been discounted primarily as a result of the proud record Coventry has as an International City of Peace and Reconciliation, promoting peace and dialogue, acting as a place of safety and City of Sanctuary for people arriving into the city. The MiFriendly Cities bid references work the City has done collectively to support the most vulnerable refugees from the humanitarian crisis in the Middle East and will offer opportunities to continue work to improve community cohesion in the City. The ambition is to benefit both host and migrant communities continuing efforts to make Coventry a vibrant city where people choose to live and work.
- 2.2. The option remains for the City to request either one of the other local authority partners to act as lead for the project or the West Midlands Regional Authority to take this role. This would likely lead to a reduction in the funding allocated to the City and a dilution of the Coventry focus of much of the work contained in the successful bid. One of the bids

key strengths is the strong partnership work between Coventry University and the City Council with a number of work streams requiring continued joint work in the City. On this basis this option has not been included in the recommendations.

- 2.3. The recommended option is for the Council to act as lead applicant for this UIA project, and to act as accountable body for programme funding. This maximises the European grant available allowing the Council to take a leadership role, working with key partners, locally and across the region in the delivery of MiFriendly Cities. The City has an excellent track record of managing projects of this type and using them to create positive outcomes for the City, supporting wider Council priorities around the growth of the City and economic prosperity. This project will assist in ensuring that a particularly economically disadvantaged section of Coventry society (refugees and newly arrived communities) are supported to maximise their contribution to society in the City's growing economy.

Summary of the MiFriendly Cities Partnership

2.4. Coventry City Council €720k

- 2.4.1. The Council will co-ordinate the work locally and across the region on the MiFriendly Cities project including acting as the accountable body for the overall funding. The Council will also ensure that learning from various strands of the project are shared regionally and wider, culminating in the final evaluation and knowledge-sharing for the project in 2020.
- 2.4.2. Locally work will focus on supporting, enhancing and recognising the contribution of migrant and refugee communities to social, economic and public life. The project will build capacity within these communities to feel empowered to understand their rights and challenge prejudice and hostility that may come their way.
- 2.4.3. The project will adapt the global network of My "friendly cities" where the refugees and migrants themselves have a voice, and will offer support to a number of themes including: jobs, social enterprise, innovation, active citizenship and communication. This will include creating new job opportunities for migrants, developing and matching their skills with employers as well as preparing employers to work well with refugees. Also up to 50 social enterprises will be supported in establishing themselves (including financial support).

More work will be done in engaging communities using a bottom up approach with over 100 refugees and migrants being trained as citizen journalists to engage with mainstream media.

- 2.4.4. Subject to formal approval a delivery plan will be developed for the project elements led by Coventry City Council. This will include liaising with key internal stakeholders including the Job Shop and the employment team to ensure that a co-ordinated programme of activities is delivered to maximise the benefits of this funding.

Key partners in delivery of MiFriendly Cities in Coventry will be:

2.5. Coventry Law Centre €148k

- 2.5.1. The Law Centre will assist in work on rights and advocacy for refugees and migrants, building on their earlier work with unaccompanied minors to assist those without documentation to secure status.

2.6. Coventry Refugee and Migrant Centre €511k

- 2.6.1. The Refugee and Migrant Centre will be supporting the range of projects going on across the City including recruiting volunteers and delivering more ESOL support. They will also receive funds to assist in the refurbishment of Hope House which will be a resource for refugee and migrant communities.

2.7. Coventry University FAB LAB €750k

- 2.7.1. The University and City Council have opened an exciting new FAB LAB in the City to improve access to important new technologies and particularly to help children explore opportunities to learn new digital skills. Participation in MiFriendly Cities will enable two mobile FAB LABS to be purchased which will enable this technology and resources to be accessed across the City, including in libraries and other community settings. Training will be provided to enable refugees to gain confidence and digital skills being then able to volunteer, assisting both refugee groups but also for the wider Coventry community.

2.8. Coventry University – Social Enterprises €168k

- 2.8.1. Up to 50 social enterprises will be created by the provision of training, workshops and coaching and mentoring programmes. Also 16 social enterprises will be financially supported to make their ideas a reality and contribute towards the city's economy.

Across the region a number of other partners will play a role in the project:

2.9. Birmingham City Council €388k

- 2.9.1. There will be a number of projects in Birmingham including home make-overs and work to improve the DIY skills of migrants and refugees. This will also include 30 homes identified in Coventry that will be given a makeover under this project.

2.10. Interserve (working with WMCA) €307k

- 2.10.1. Interserve will provide a regional focus for work with employers around social mobilisation and promoting volunteering by employees as well providing training and briefings for employers on issues related to employing refugees and migrants.

2.11. Migrant Voice €237k

- 2.11.1. Training will be provided for refugees and migrants in Coventry and other localities to assist refugees to tell their stories and engage with host communities. Photography, film-making and writing will be included as well as support for community dialogue.

2.12. Migrant Work €314k

- 2.12.1. Migrant Work have significant experience of producing migration related policy briefings and practitioner toolkits. They will support the knowledge transfer and produce a number of resources to support policy development and communications regarding issues affected by migrants in UK cities.

2.13. **Refugee and Migrant Centre €290k**

2.13.1. This centre based in Wolverhampton will recruit refugee health champions to disseminate public health messages to refugee communities along with establishing employment brokers to assist refugees accessing sustainable employment.

2.14. **Wolverhampton City Council €442k**

2.14.1. Wolverhampton will be setting up a pop-up furniture factory as a social enterprise to up-cycle unwanted furniture and assist in its distribution to those across the City in need. Discussions are already underway for a similar initiative to be tried in Coventry alongside the FAB LAB.

2.15 **Project governance**

2.15.1 The project will be governed by a 3-tier governance structure to ensure that appropriate advice, guidance and leadership is provided and for any risks being identified and addressed in a pro-active and appropriate way.

2.15.2 A “Project Steering” group will be setup that will include political membership from the 3 cities of Coventry, Wolverhampton and Birmingham and will be supported by senior management from these respective authorities. This will also include programme leads from other partner organisations, 3 migrants, external experts as needed and the allocated UIA expert when possible. This group will ensure that they are directing the partnership and providing strategic advice and guidance for the project.

2.15.3 The partnership will also have a “Project Committee” that will include the Project co-ordinator from Coventry City Council, Project Managers from respective partners as well as Work Package leads. These meetings will be held monthly ensuring:

- partners respect the work plan deadlines and intermediate/final results
- preparing, executing and post processing of partner meetings and EC reviews;
- ensuring the proper function of the steering group and project coordination committee
- partners are supported to deliver the project successfully.

2.15.4 To deliver various work-packages successfully, various work package groups will be created to deliver each strand of the project and these meetings will be organised as per the demand of these work streams.

2.15.5 Reporting mechanisms including risk registers and exception reporting will be put in place to monitor and manage risks and seek appropriate advice and guidance from the governance structures.

3. **Results of consultation undertaken**

3.1. In preparation for this proposal, face to face meetings were held with organisations over 6 months, running co-creation workshops and consultations including both proposed beneficiaries as well as wider stakeholders, supported through the local and regional migration partnerships. This work included representation from 60 or more organisations.

3.2. At a more local level, the funding application was pulled together based on work that the Council's migration team have been undertaking over the last 2 years to bring together

“Coventry’s Local Migration Network”. This network includes voluntary, statutory and private sector organisations working together to support refugees and newly arrived communities integrate into the city. The findings from these meetings has been the basis for submitting an application that has demonstrated a bottom up approach which is believed to be a key factor in funds being awarded for the project. The participation of refugee and migrant communities and those who work hard to support them in developing this proposal has been critical.

4. Timetable for implementing this decision

- 4.1. Subject to the successful completion of agreements with UIA the project will run for three years concluding in 2020 with the final closure and knowledge transfer completed in late 2020. Once final agreement has been reached each of the delivery partners will be given a Grant Aid Agreement that sets out their contribution to the project in terms of match funding and outputs, and sets out how much UIA / EDRF funding will be available to them. This process is expected to be completed by the end of 2017.
- 4.2. The projects will run until 2020. It is not anticipated that it will be necessary for extensions to this timetable although other EU projects have successfully negotiated extensions in the past.

5. Comments from the Director of Finance and Corporate Services

5.1. Financial implications

- 5.1.1 The total grant award is €4,280,640 (£3.8m) of ERDF funding with the Council proposing to be the accountable body for the project. The Council will receive €720,660 (£634k) of the funding as described above in paragraph 2.4.
- 5.1.2 As Accountable Body, Council officers will ensure effective governance arrangements are in place to facilitate appropriate control over the allocation of resources and spend against the approved programmer outlined above.
- 5.1.3 The rules require participating organisations to match fund or provide in kind 20% of expenditure with the grant covering 80%. The City Council will be required to match fund €180,150 (£158k) from existing Council expenditure.
- 5.1.4 The payment profile for the project is as follows:
- 50% advance payment within 90 days of final agreement of participation including €16,000, for bid preparation (to be shared with Coventry University).
 - 30% payment within 90 days after submission and approval of an interim progress report and verification of project expenditure (payment will be granted provided the reported expenditure has reached 70% of the first instalment).
 - 20% payment within 90 days (minus a lump sum of €12,000 dedicated for the project closure and transfer of knowledge) after submission and approval of the final progress report. This payment is based on the principle of reimbursement of incurred and paid costs.
 - €12,000 after submission and approval of the final qualitative report.

5.2. Legal implications

The Council has the power to enter into this arrangement under the powers contained in section 1 of the Localism Act 2011

The Council will act as the accountable body for this UIA/ERDF project. The Council will be issued with a grant agreement from the administrators containing terms and conditions. The terms and conditions will be devolved to any partners within the overall project. These will ensure that appropriate conditions and obligations which are imposed upon the Council are passed on to the grant recipients who receive the funding for delivering projects.

6. Other implications

Any other specific implications

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

Coventry is a growing City with advanced planning in place for further economic development and investment. Inwards migration into the City has been a significant factor in population growth in recent years and MiFriendly Cities will support the wider delivery of the Council’s key objectives by supporting community cohesion and ensuring that newly arrived communities contribute to the City’s economic prosperity and cultural diversity. Additionally the following specific issues will be addressed:

- **Active communities and empowering citizens** – Having awareness of civic, political and legal rights is a cornerstone for active citizenship and a fully functioning regional democracy, as is feeling empowered sufficiently to access these rights. Refugees and migrants in Coventry and the W M and have low levels of awareness of rights and often struggle to access them. The project will address this.
- **Protecting our most vulnerable** – The programme is aimed at a vulnerable group of our society ie refugees- a section of our population who seek asylum after having fled their home countries due to threats and fear of their life. The project will also engage individuals who have retired and hence involve some of our older population as well.
- **Reducing the impact of poverty** – 30 homes will be given ‘makeovers’ by volunteers learning new skills using ‘up-cycled’ furniture and other materials, benefitting the volunteers and the vulnerable older and younger people’s homes. The creation of linking of migrants and refugees to job markets and volunteering and training will assist a number of people to become economically active.
- **Improving health and wellbeing** – the recruitment and training of Health Champions will assist in priority communities supporting their own health and well-being and reducing health inequalities.
- **Making the most of our assets** – utilisation of EU funding maximises the effectiveness of City Council resources and enables the City to innovate and develop effective interventions
- **Make communities safer** - Addressing hostility towards newcomers, recognising the positive contribution that refugees and migrants make and building solidarity between migrant and non-migrant communities is a core objective of the MiFriendly Cities project.

6.2. How is risk being managed?

The following key risks have been identified across the programme that can have an impact on the success of the Project and for us as the accountable body and hence will need monitoring and managing:

<i>Risk</i>	<i>Impact</i>	<i>Likelihood</i>	<i>Proposed actions</i>
Partner withdraws from the	<i>Minor</i>	<i>Possible</i>	In each city we have a local migration network, each with at least 20 member organisations. Therefore we have a pool of between 60+

project			additional organisations who could fulfil the role of the withdrawing partner.
Project unable to meet expenditure targets	Serious	Improbable	Project expenditure against financial targets will be monitored at Project Board meetings held at a Work Package level. Delivery Partners' contracts/Service Agreements will all clearly stipulate their expenditure schedules. If the risk materialised, the steering group would provide recommendations on if and where to vary budgets. Partners have confirmed that they have necessary match funding in place, and the 80% ERDF intervention rate means there is low risk of match funding not materialising.
Project unable to achieve output targets, which may or may not be related to Issues with the performance of project Delivery Partners.	Serious	<i>Remote</i>	Project delivery against outcome targets will be monitored at Project Board meetings at a Work Package level. Delivery Partners' contracts/Service Agreements will all clearly stipulate their output schedules. If the risks were to materialise, the steering group would provide recommendations on potential solutions. All Delivery Partners will also be required to report on their performance in respect of outputs, a core responsibility of the Project Management Team.
Project records irregularities for ineligible expenditure or outputs not evidenced adequately.	Serious	<i>Remote</i>	The project management team will visit all Delivery Partners prior to the submission of the first claim to ensure that their supporting evidence for expenditure and outputs claimed meets ERDF requirements. Throughout the delivery of the project, the project management team will deliver "Monitoring Visits" to Delivery Partners whereby supporting evidence of expenditure and outputs claimed will be checked.
Key delivery or project management staff leave their posts.	Serious	Possible	For project management staff, the Urban Authorities have a large team of staff with experience of managing and delivering ERDF projects and a replacement will be appointed. For any delivery staff leaving post, they will be replaced through the vacancy being publicly advertised.
Impact of Brexit on grant resources	Serious	Possible	Whilst uncertainty remains regarding the post-Brexit period the Government announced in August 2016 – "where UK organisations bid directly to the European Commission on a competitive basis for EU funding projects while we are still a member of the EU, for example universities participating in Horizon 2020, the Treasury will underwrite the payments of such awards even when specific projects continue

			<i>beyond the UK's departure from the EU.” This provides some assurance to resources being available for the lifetime of the project.</i>
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6.3. What is the impact on the organisation?

HR Implications

To ensure the successful delivery of this project and the Council’s ability to provide an adequate accountable body function, additional staff resources may be required. Some staff are already in place for aspects of the City Council and other planned activities. Any new staff will be recruited on a temporary fixed-terms basis.

6.4. Equalities / EIA

Coventry becoming a MiFriendly City is likely to have a positive impact on equalities in the City. Many of the elements of this programme are designed to assist and support some of the most economically disadvantaged communities in the City.

Residents from ethnic minorities and who are newly arrived will make up a significant proportion of those taking part in the various elements of the programme with work focusing on skills development, employment and training support, and social enterprise creation. It will demonstrate that the Council is meeting its statutory duty in promoting equality of opportunity to employment and in promoting community cohesion, through enabling migrants and residents from well-established communities to live and work together.

6.5. Implications for (or impact on) the environment

MiFriendly Cities includes work to improve the DIY skills of migrants and newly arrived communities and includes the setting up of community repair cafes and furniture “up-cycling” which will lead to less furniture and electrical equipment being disposed of and increased re-use and re-cycling.

6.6. Implications for partner organisations?

The funding will have a positive implication for the voluntary sector by bringing in additional resources, capacity and infrastructure into the city. The funding also aims to further promote community cohesion and enhance the contribution residents are making towards the economy and more importantly the social fabric of the city.

It will also boost partnership work of the Social Enterprise City initiative, which is led by Coventry University and is growing a network of sustainable social enterprises. It will support Coventry University to demonstrate how it is operating as an anchor institution by making a valuable contribution to quality of life and a strategic contribution to the local economy.

Report author(s):**Name and job title:**

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Councillor Abdul Khan	Deputy Leader		2/11/2017	
Councillor Linda Bigham	Cabinet Member		2/11/2017	3/11/2017

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**Coventry City Council
Equality and Consultation Analysis (ECA) Form**

In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Part 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Sunairah Miraj

Name of Service Area/Proposal: MiFriendly Cities – Urban Innovative Actions Fund

Head of Service: Peter Barnett

Date of completion: 1st November 2017

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered? *If further information is available on the different scenarios that have been considered as part of this work, provide a link to the public document which contains this information.*

The MiFriendly Cities project aims to facilitate and recognise the positive contribution of refugees and migrant's to the cities civic, economic and social fabric. Refugees and migrants are key factors in deciding what makes a "migrant friendly city" and driving the change on job creation, social entrepreneurship & innovation, active citizenship and communication.

2. Who do you need to consider as part of this ECA?

This proposal covers services and interventions which are specifically aimed at asylum seekers, refugees, migrants and all newly arrived communities. Work has also been undertaken in discussion and engagement with key voluntary sector partners who work in partnership with the City Council to support these groups.

Pre-Consultation Engagement

3. What engagement activities took place prior to formal consultation and what feedback was received in relation to equality issues?

In preparation for this proposal, face to face meetings were held with organisations over 6 months, running co-creation workshops and consultations including both proposed beneficiaries as well as wider stakeholders, supported through the local and regional migration partnerships. This work included representation from 60 or more organisations. The proposals collectively are considered by the Migration Team and associated partners as having a potentially positive impact on some of the most deprived communities in the City

Coventry City Council Equality and Consultation Analysis (ECA) Form

and across the region. The consultation highlighted the gap in service and support available to this client group and hence the project was drawn up to address these needs.

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect **protected groups**. These groups are:

Age
Disability
Gender
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
Sexual Orientation

The **three aims of the general duty** require that a public authority, in the exercise of its functions, must have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

Note – when identifying potential impacts below, please only include impacts that may exist over and above general impacts that may affect the wider community/population. For example, a reduction in grant to Coventry Citizens Advice would affect all service users through a reduced level of first line advice being available to all – but it would affect the following groups more; age, disability, gender and race as they represent a larger proportion of the clients who use the advice service.

4. Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps (if any) could be taken to reduce any negative impact that has been identified. ***NB. only include realistic mitigating actions that could be delivered.***

MiFriendly Cities is a project intended to address some of the most serious inequalities which exist in the UK. Migrants from BME backgrounds are more likely to be economically inactive and less likely to be employed. MiFriendly Cities includes a range of initiatives to improve skills, create volunteering and employment opportunities, stimulate social enterprise creation and raise awareness of rights and responsibilities.

Race – Residents from BME backgrounds will benefit particularly from the additional capacity created by this project. Overall the project is intended to bring different communities

Coventry City Council Equality and Consultation Analysis (ECA) Form

together and to remove discrimination and prejudice which can negatively impact on refugees and migrants from BME backgrounds.

Religion / Belief – Refugees and Migrants are often of non-Christian faiths, with current trends including many refugees from Muslim backgrounds. Work to stimulate skills development, volunteering opportunities and access to employment are likely to have a positive impact on such groups in Coventry.

5. Are there any other vulnerable groups that could be affected? i.e. deprivation, looked after children, carers.

Also include any information about the health/Marmot implications of this proposal. Hannah Watts (hannah.watts@coventry.gov.uk or tel. 7683 3973) in Public Health for more information.

Refugees and migrants with other protected characteristics are likely to be impacted positively as are refugees and migrants who are also carers and the looked after population. This work is designed to create greater social integration and support community cohesion.

6. What are the gaps in evidence? Can this be addressed during the consultation stage? If so, how?

MiFriendly Cities has been a project developed in close co-operation with Coventry University and as such includes a strong element of analysis, evaluation and learning dissemination which will evidence gaps. As such making Coventry a MiFriendly City will also produce a strong evidence base which will be useful in developing any further projects with similar objectives.

7. What are the likely impacts of this project/review on staff from protected groups?

There are no anticipated impacts on staff from protected groups, although participation in the project will require that the City Council employ a small number of staff for project management and operational purposes.

Coventry City Council
Equality and Consultation Analysis (ECA) Form

Part 2

This section should be completed AFTER the consultation stage has been concluded.

Author of this document: Sunairah Miraj / Peter Barnett

Date of completion: 1st November 2017

Post-Consultation

8. Referring to the information detailed in question 4 of Part 1 of the ECA Form, state if the consultation has confirmed the potential impacts identified that were identified. Also detail below any additional information about potential impacts that has been highlighted during the consultation.

Yes the consultation has identified the issues/needs that the project will have a positive impact.

Outcome of equality impact

9. Indicate which of the following best describes the equality impact of this project/review:

- There will be **no** equality impact if the proposed option is implemented
- There will be **positive** equality impact if the proposed option is implemented
- There will be **negative** equality impact if the proposed option is implemented but this can be objectively justified
- There will be both **positive and negative** impacts if the proposed option is implemented

Summary of ECA

Coventry becoming a MiFriendly City is likely to have a positive impact on equalities in the City. Many of the elements of this programme are designed to assist and support some of the most economically disadvantaged communities in the City.

Residents from ethnic minorities and who are newly arrived will make up a significant proportion of those taking part in the various elements of the programme with work focusing on skills development, employment and training support, and social enterprise creation. It will also demonstrate that the Council is meeting its statutory duty in promoting equality of opportunity to employment. Additionally, by the promotion of community cohesion, as it will enable migrants and residents from well-established communities to live and work together.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Where specific objectives have been set for any protected groups around equality impact, also include this information below.

The projects aims to achieve the below that will have a positive impact on the group:

1. To develop, test and evaluate bottom-up participatory approaches towards developing innovative solutions to better integrating refugees and migrants and to engender lasting solidarity between communities in the West Midlands region.
2. To enable urban authorities and civil society in the three cities to work together more effectively throughout the life of the project and beyond to develop and implement innovative solutions to tackling the challenges of integrating refugees and migrants at regional level rather than only at city level.
3. To improve the employment rate of refugees and migrants in Coventry, Birmingham and Wolverhampton, including through self-employment, social enterprise and entrepreneurship, innovation, active citizenship and working with employers.
4. To improve the health outcomes of refugees and migrants in Coventry, Birmingham and Wolverhampton through community-led initiatives, and ultimately reducing public health risks in the whole community.
5. To increase the social participation of refugees and migrants in the West Midlands, feelings of belonging and citizenship, and solidarity between different communities.
6. To improve refugees' and migrants' awareness of rights and their confidence in accessing them.
7. To effectively combat the increasing prejudice towards refugees and migrants in the West Midlands
8. Facilitate and recognise the positive contribution of Refugees and Migrants to the Cities civic, economic and social fabric

Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjanian (wendy.ohandjanian@coventry.gov.uk tel. 7683 2939)

Jaspal Mann (jaspal.mann@coventry.gov.uk tel. 7683 3112)

Version Control

Version	Date	Summary of changes (Author)
1.0.0	26.05.16	Initial release (Jaspal Mann)

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Public report Cabinet Report

Cabinet

28 November 2017

Name of Cabinet Member:

Cabinet Member for Jobs and Regeneration - Councillor O'Boyle

Director Approving Submission of the report:

Deputy Chief Executive (Place)

Ward(s) affected:

All

Title:

Coventry Station Masterplan Procurement Strategy Update

Is this a key decision?

Yes as it has the potential to affect all wards within the City and expenditure is in excess of £1m

Executive Summary:

The Coventry Station Masterplan programme is set to deliver transformational improvements to Coventry Railway Station. The £82m Coventry Station Masterplan was developed in response to a 2014 study that looked at the city's future rail needs. The initial masterplan was approved by Cabinet in March 2015 and has subsequently been developed to ensure that it meet the needs of an aspirational and growing city. The revised masterplan was approved by Cabinet on 24th January, 2017.

The Coventry Station Masterplan project will deliver a new footbridge, bay platform, second station building and multi-storey car park, bus interchange and new highway infrastructure.

As the scheme has developed the procurement strategy has been reviewed and refined to ensure best value for money is achieved. Extensive market testing has been undertaken to help shape a revised procurement strategy. This report sets out how the masterplan will be procured, highlighting changes in the procurement strategy since the January 2017 Cabinet Report. It seeks Cabinet's approval to go out to competitive tender in line with the procurement strategy detailed below.

Note a further Cabinet Report will be submitted early 2018 to obtain approval for land acquisition to deliver some elements of the project.

Recommendations:

Cabinet is requested to:-

- (1) Approve to proceed with the procurement for the design and construction of the six packages of the Coventry Station Masterplan Scheme

- (2) Delegate authority to the Deputy Chief Executive (Place) and Cabinet Member for Jobs and Regeneration to authorise award of contracts.
- (3) Note that Cabinet approval will be sought in the event that contract values are over £1m above the approved contingency level for each contract.
- (4) Delegate authority to the Deputy Chief Executive (Place), to enter into the relevant legal agreements and associated documents necessary to contract with the selected suppliers for the delivery of the six packages of the Coventry Station Masterplan Scheme, following the approved procurement activity.

Background papers:

None

Other useful documents:

Cabinet 16th August, 2011: NUCKLE (Phase 1) – Submission of Best and Final Bid to DfT

Cabinet 30th August 2011: NUCKLE (Phase 1) – s151 Officer Declaration for Best and Final Bid to DfT

Cabinet 3rd January 2012: NUCKLE (Phase 1) – Project Cost and Funding Update

Cabinet 4th March 2014: NUCKLE (Phase 1, Package 1)

Cabinet 3rd March, 2015: Coventry Station Regeneration and associated rail improvements

Cabinet 24th January 2017: Connecting Coventry

Cabinet 24th January 2017: Coventry Station Masterplan Update

All of the above are available from the Council's website:

<http://moderngov.coventry.gov.uk/ieListMeetings.aspx?Committeeld=124>

Has it been or will it be considered by Scrutiny?

No

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

No

Will this report go to Council?

No

1. Context (or background)

- 1.1 Coventry Station has experienced very high rail growth, becoming one of the busiest stations on the West Coast Mainline, and passenger demand is forecast to continue to increase significantly, particularly with the Friargate development around the station. Passenger activity at the station is forecast to increase from circa 6.9m trips per annum today to 7.5m pa in 2023 and nearly 11m pa in 2043, contrasting with just 2.25m pa in 2001. The station has suffered from a lack of investment and is experiencing capacity issues that will start to increasingly displace passenger activity to other stations and modes of transport. This will undermine the role of the station in supporting city centre regeneration and its ability to attract and retain inter-city rail services, which significantly benefit the city economy. Consequently, working with the Coventry & Warwickshire LEP, Friargate LLP and rail industry partners, a Station Masterplan has been developed and funding sources identified.
- 1.2 Coventry Station Masterplan will deliver extra capacity, improved accessibility and a better first impression of Coventry, through new infrastructure including footbridge and canopy extension, NUCKLE 1.2 bay platform, track and signal work, a second station building, 633 space multi-storey car park and bus interchange, complemented by new highway infrastructure. The works will start on site next spring and be completed by summer 2021.
- 1.3 A full business case has been developed for the scheme, which identifies that there is already a need for additional capacity to be created at Coventry Railway Station as a result of significant passenger growth. The business case also demonstrates that when HS2 is in operation post 2026 there will still be sufficient growth and demand at Coventry Station which justifies this investment, even if direct London train services are reduced.
- 1.4 Note that while Coventry Very Light Rail (VLR) is a separate project to the Station Masterplan the schemes are linked, as its intended the future VLR service will serve the railway station. The highway and new junction on Warwick Road has therefore been designed to ensure VLR can be accommodated in the future.
- 1.5 £40.6m of funding for the £82m Station Masterplan programme is already secure through sources including CWLEP Local Growth Deal and DfT funding. The remaining £39.4m funding required for the scheme will be from Devolution Deal, subject to approval of a Full Business Case from West Midlands Combined Authority which is anticipated by the end of the year.
- 1.6 The programme is currently at detailed design stage, following approval of the scheme at Cabinet on 24th January 2017.
- 1.7 In order to successfully procure and deliver these improvements, the packages of work for the Station Masterplan have been grouped into six work packages as follows:
- a) Footbridge and Canopies
 - b) Substation and Services
 - c) NUCKLE 1.2 (Bay Platform)
 - d) 2nd Entrance and multi-storey car park
 - e) Bus Interchange
 - f) Highways

2 Options considered and recommended proposal

Coventry Station Masterplan Procurement Options

- 2.1 There are two options for how to procure the construction for the scheme, either via an open competitive OJEU process led by Coventry City Council, or alternatively a direct agreement with Network Rail.
- 2.2 In the January 2017 report, it was envisaged that the procurement for the construction of the Footbridge and Canopies and the bay platform would be delivered through a direct agreement with Network Rail, who were deemed best placed to manage the risk of working in direct vicinity around a live railway.
- 2.3 The procurement strategy for the construction of the car park and station buildings was still being reviewed, however, it was envisaged and proposed that an Open or Restricted OJEU tender procedure would be undertaken to drive competition and best value.
- 2.4 Since January 2017 the project team have changed the position in relation to appointing Network Rail to deliver the footbridge and canopies and the bay platform. This is because the risk associated with working near a live railway is outweighed by the risk of programme overruns and failing to achieve value for money if Network Rail deliver these packages.
- 2.5 It is now considered necessary to carry out an Open or Restricted OJEU tender procedure to drive competition and best value.
- 2.6 To inform the current approach, Coventry City Council's appointed project managers, SLC Rail, who assisted in re-evaluating the Coventry Station Masterplan (CSMP) and NUCKLE Phase 1.2 procurement strategies to ensure all elements were considered, packaging opportunities identified and to offer recommendations based on the findings. The following activities took place:
- **Market Testing** – A market testing exercise was undertaken with a number of contractors with significant experience of delivering projects of this type and size in a rail environment. The findings were then used to inform and validate the final recommendations.
 - **Delivery Phasing** – The delivery packages were further reviewed from a technical standpoint, with the view of potentially combining or re-packaging works to improve programme, reduce disruption to the highway / railway or to deliver cost efficiencies.
 - **Programme Review** – The impact of any procurement and phasing changes was incorporated into the delivery programme to understand the overall impact on completion dates.
- 2.7 Following the above activities, a report was produced which highlighted that a competitive tender process would add significant value to all elements of the scheme given that;
- previous experience delivering work through Network Rail has resulted in cost overruns and delays;
 - there is an appetite from construction contractors to work with Network Rail to deliver elements of the scheme;
 - contractors are prepared to risk share;
 - a competitive tender exercise would not impact on programme by delaying current delivery dates; and
 - combining or re-packaging works could improve programme, reduce disruption to the highway / railway and produce cost efficiencies.
- It is therefore recommended that CCC move towards a strategy of directly managing the works with the project management support of the authority's Rail Framework consultants, interfacing with Network Rail via an Asset Protection Agreement where appropriate.

- 2.8 It is proposed that the following procurement routes are used for each package of the scheme:
- a) Footbridge and Canopies – It is recommended an OJEU tender process is followed to secure a contractor to deliver the package on a design and build basis. The OJEU process will open the opportunity to all interested suppliers, therefore maximising competition.
 - b) Substation and Services – It is recommended a non OJEU tender process in line with the Council’s Rules for Contracts is undertaken. An OJEU tender process is not required due to the value of the package falling below the OJEU competition threshold for works. The tender process will allow all interested suppliers in a relatively limited market to bid and maximise competition.
 - c) NUCKLE 1.2 (Bay Platform) – An OJEU tender process will be followed to appoint a single contractor to deliver the package on a design and build basis. The OJEU tender route will ensure competition is maximised and contractors with appropriate rail expertise are given the opportunity to bid which is essential due to the heavily rail based scope of these works.
 - d) 2nd Entrance and Multi-storey Car Park – An OJEU tender process will be followed to secure a contractor to deliver the package on a design and build basis. The OJEU process will open the opportunity to all interested suppliers, therefore maximising competition and delivering value.
 - e) Bus Interchange - An OJEU tender process will be followed to secure a contractor to deliver the package on a design and build basis. The OJEU process will open the opportunity to all interested suppliers, therefore maximising competition and delivering value.
 - f) Highways – An OJEU tender process will be undertaken to secure a contractor to deliver this package on a build only basis, as the design is currently underway with an external design partner. The OJEU process will open the requirement to the whole of the market, therefore maximising the opportunity for competition.
- 2.9 Due the complex nature of the project, the project team may need to restructure the technical content of the packages as unforeseen technical and programming constraints arise. This flexibility will allow the project team to overcome constraints in a timely and efficient manner, and ensure efficiencies are maximised wherever possible. Additionally flexibility is required for repacking works if opportunities arise that enable the programme to be brought forward, for example if third party land can be acquired to deliver the highways element earlier than scheduled.
- 2.10 In formulating the procurement strategy for the above packages, existing frameworks and procurement routes were investigated. As the majority of the above packages are specialist in nature, the project team recommend the procurement routes set out above, as there are no pre-existing frameworks that could provide the specific expertise required and drive best value for the Council. Each of the above packages were formulated taking into account programming and technical constraints, while being formulated to achieve best value.
- 3. Results of consultation undertaken**
- 3.1 The proposals have been clearly set out in public papers, agenda’s and reports of both the Coventry & Warwickshire Local Enterprise Partnership and the West Midlands Combined Authority Movement for Growth Strategy, the funding bodies which have allocated funding. Additionally Coventry City Council’s Business, Economy and Enterprise Scrutiny Board (3) considered the principles of the proposed scheme during a public meeting in April 2014.

- 3.2 Additionally the NUCKLE scheme is well known and subject to regular press coverage and a number of previous public committee reports.
- 3.3 Pre-planning public engagement is due to take place this autumn ahead of submission of planning applications for the scheme.

4. Timetable for implementing this decision

- 4.1 It is proposed to go out to tender for the footbridge and canopies December 2017, works are due to commence on site spring 2018. The tender for NUCKLE 1.2 will follow early 2018 with works scheduled to commence autumn 2018. The remainder of the scheme packages will be tendered during 2018.

5. Comments from the Director of Finance and Corporate Services

5.1 Financial Implications

The report is seeking approval to proceed on procurement aspects of the project. At this stage therefore, there is an expectation that the existing £82m approved budget is sufficient. The procurement strategy is managed within the project governance and any changes which increase the tender prices above the £82m approved budget would be brought back to Cabinet/Cabinet Member for approval as required by the constitution.

Table 1 below provides a full breakdown of project costs. The costs include for project management, design and construction and includes £12.4m contingency across the programme.

PROGRAMME ITEM	Total (£000)
CCC Internal Costs	1,054
Rocket Pub	154
Access Tunnel	3,047
Footbridge & Canopies	9,447
Multi-Storey Car Park	13,499
Secondary Entrance	10,985
Bus Interchange	4,761
Substation	1,547
Highways	19,389
Nuckle 1.2	18,131
TOTAL PROGRAMME	82,014

Table 1: Breakdown of capital scheme costs

Cabinet approval will be sought in the event that contract values are over £1m above the approved contingency level for each contract. Any cost increases above approved contingency levels would need to be dealt with by using contingency from other scheme elements within the £82m programme, de-scoping or seeking additional funds.

5.2 Legal Implications

The Local Authority has wide powers to enter into arrangements such as those proposed in this report. Under Section 111 of the Local Government Act 1972 a local authority, such as Coventry City Council and its partner, Warwickshire County Council, has powers to do

anything calculated to facilitate, or is conducive or incidental to the discharge of its functions. The Local Government (Contracts) Act 1997 also gives power to Local Authorities to enter into contracts with third parties.

Coventry City Council and Warwickshire County Council can use the general power of competence under the Localism Act 2011 to enable them to go ahead with the proposed scheme. This allows the authority to do anything which an individual may do which is only subject to any specific restrictions set out in any legislation, of which there are none in respect of the proposals set out in this report.

Coventry City Council will be required to submit a planning application in order to seek permission for the delivery of the bus interchange, while Friargate LLP will make a Reserved Matters Application under their 2011 Outline permission for the highway infrastructure changes.

Procurement Implications

The Council will be undertaking all procurements of the works packages proposed above in line with all applicable United Kingdom and European procurement legislation and any implementing measures and any other legislation in connection with the procurement of works, supplies or services including European Union directives.

State Aid Implications

In the railway sector the responsibility to operate and manage the main national railway network is typically the responsibility of the State, either through an administrative body or by a public undertaking, in most cases under a legal monopoly, which within the UK is Network Rail. As the management and operation of the main rail infrastructure networks within the EU are generally carried out in national, geographically closed and separated markets that are not subject to competition, public financial support made available to infrastructure managers is generally not liable to affect trade between Member States. Therefore the Council considers that state aid is not applicable to Coventry Station Masterplan as it is of the view it does not affect competition and trade between Member States in relation to the investment into the construction, maintenance and management of general railway infrastructure.

6. Other implications

The City Council has taken advantage of recent changes in railway regulations to become a 'station investor' at Coventry station. Taking this role means changes to the station layout to implement the various elements of the Masterplan can be proposed; the scope of change can be managed directly with the relevant rail industry stakeholders; any compensation for disruption caused can be negotiated directly with the affected party; and for a five year period it will mean that Coventry City Council becomes a consultee on any other parties change proposals for the station.

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

A prosperous Coventry with a good choice of jobs and business opportunities for all the city's residents.

This scheme improves the links through the designated regional investment priority zone, bringing people, from the north of the zone, to the city centre and the heart of the Friargate development.

Making places and services easily accessible for Coventry people

The Coventry to Nuneaton corridor suffers from traffic congestion. The population density and level of activity in the corridor is growing and will create increasing demand for

transport. There are large scale redevelopments planned in Coventry city centre and redevelopment around the Ricoh Arena continues. This scheme will provide a credible public transport option, now and in the future, for travel along the corridor and enable robust green travel plans to be implemented.

Improving Coventry's environment and tackling climate change

The scheme would provide a credible public transport service that would make modal shift to rail travel a reality; therefore reducing the number of people using the congested highway, and reducing the CO² emissions; therefore improving the impact on the environment.

6.2 How is risk being managed?

Arrangements are in place within the Place Directorate to deliver the accountable body role ensuring that procedures are in place to manage risk. There is a robust governance structure in place for the programme whereby risks are managed by programme and project team level and reported to board. Regular risk workshops are undertaken on all projects to ensure active monitoring and management. Standard rail industry procedures and appropriate contractors and contracts will be used throughout.

Financial risk to the Council will be managed through the establishment of an appropriate legal commitment between the partners and contractors, specifying both capital and revenue contributions, and the establishment of a risk sharing basis.

6.3 What is the impact on the organisation?

HR Implications

Managing complex rail projects requires a significant level of expertise not normally held within Local Authority. Consequently a specialist client side rail project management company has been commissioned to provide a team of senior Officers from Place and People Directorates with appropriate support. The Officer team comprises representatives from finance, legal and transport and property teams.

6.4 Equalities / EIA

A significant part of the scheme appraisal process used to secure funding assesses the impact of equality. Equality impact assessments are in place and there is a stakeholder management plan in place to ensure mobility groups are consulted throughout the design and construction of the works. All aspects of the scheme will be Equality Act 2010 compliant.

6.5 Implications for (or impact on) the environment

A significant part of the scheme appraisal process used to secure funding assesses the impact of environment. This has been demonstrated through the submission to the funding bodies. The scheme has clear environmental benefits in terms of providing an enhanced public transport interchange to encourage modal shift.

6.6 Implications for partner organisations?

The schemes are jointly promoted by CCC, Warwickshire County Council and the Coventry and Warwickshire Local Enterprise Partnership.

Network Rail and Friargate LLP, as important stakeholders, are involved in the progression of the scheme.

If the scheme is not delivered the CWLEP area will lose one of its priority schemes.

The scheme is also important on a regional level in terms of connectivity to UK Central and HS2. The City Council is working closely with Transport for West Midlands on both of these regionally and nationally important schemes. A full business case has recently been submitted to West Midlands Combined Authority to obtain the remaining funding for the scheme. Finally the station is also an important connection within Midlands Connect which is striving to better connect the East and West Midlands, and opportunities are being explored to improve cross country services at Coventry Station.

Report author(s):

Name and job title:

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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
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Nicola Small	Senior Programme Manager	Place	23/10/17	26/10/17
Tim Metcalfe	Procurement	People	23/10/17	25/10/17
Lara Knight	Governance Services Co-ordinator	Place	08/11/17	08/11/17
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Director: Martin Yardley	Executive Director Place	Place	31/12/2017	06/12/2017
Members:				
Councillor J O'Boyle	Cabinet Member, Jobs and Regeneration		03/11/17	08/11/2017

This report is published on the council's website: www.coventry.gov.uk/councilmeetings

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Public report Cabinet Report

Cabinet
Council

28 November 2017
5 December 2017

Name of Cabinet Member:

Cabinet Member for Public Health and Sport – Councillor Caan

Director Approving Submission of the report:

Deputy Chief Executive (Place)

Ward(s) affected:

All

Title:

Indoor Pitch Facility at the Alan Higgs Centre

Is this a key decision?

Yes. The proposal in the report is a key decision because the value of the transaction is greater than £1 million.

Executive Summary:

The purpose of this report is to seek approval to provide a financial facility arrangement to enable the development of an indoor pitch facility at the Alan Higgs Centre (AHC) as part of a larger development scheme. The Coventry and Warwickshire Award Trust (CAWAT), which owns the AHC, is seeking a loan of up to £1.5m, from Coventry City Council to enable them to re-provide the current indoor pitch facility which will be displaced by the provision of the new 50m pool. The new indoor pitch facility will primarily be for community use.

If CAWAT secure the funding from Coventry City Council this will enable them to begin development of the site in time to ensure the indoor pitch facility will be ready for September 2018, limiting the period of disruption to community access to facilities.

It is proposed that the financial facility arrangement would be in the form of a 40 year loan to CAWAT, lent to CAWAT on a commercial basis and at a fixed commercial rate of interest. This financial arrangement will be at no net cost to the Council, instead the loan will generate a surplus for the Council, as the cost of borrowing for our funds are lower than the commercial rate at which the Council would lend.

Recommendations:

The Cabinet recommends that Council:

- 1) Approve in principle the grant of a loan facility up to the sum of £1.5m to Coventry and Warwickshire Award Trust, at a commercial rate of interest for a period of up to 40 years as detailed in section 5.1, for the provision of an indoor pitch facility at the Alan Higgs Centre.
- 2) Approve the addition of up to £1.5m to the capital programme.
- 3) Delegate authority to Deputy Chief Executive (Place) and the Director of Finance and Corporate Services (Section 151 Officer), in consultation with the Cabinet Member for Public Health and Sport and the Legal Services Manager to undertake all necessary due diligence and to finalise the terms and details of the loan arrangement and to thereafter manage the loan facility. The authority under this recommendation shall include the power to negotiate and agree variations to the terms of the loan facility.

The Council is recommended to:

1. Approve in principle the grant of a loan facility up to the sum of £1.5m to Coventry and Warwickshire Award Trust, at a commercial rate of interest for a period of up to 40 years as detailed in section 5.1, for the provision of an indoor pitch facility at the Alan Higgs Centre.
2. Approve the addition of up to £1.5m to the capital programme.
3. Delegate authority to Deputy Chief Executive (Place) and the Director of Finance and Corporate Services (Section 151 Officer), in consultation with the Cabinet Member for Public Health and Sport and the Legal Services Manager to undertake all necessary due diligence and to finalise the terms and details of the loan arrangement and to thereafter manage the loan facility. The authority under this recommendation shall include the power to negotiate and agree variations to the terms of the loan facility

List of Appendices included:

None

Background papers:

None

Other useful documents

Cabinet report - City-Wide Public Leisure provision 30 August 2016

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=124&MId=11040&Ver=4>

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 5th December 2017

Report title: *Indoor pitch facility at The Alan Higgs Centre*

1. Context (or background)

- 1.1. In August 2016 Council approved the recommendation (subject to planning consent) for the future development of a 50m swimming pool at the Alan Higgs Centre (AHC). The development of a 50m swimming pool on this site would displace the current indoor pitch/training facility which is used by both the community and the Coventry City Football Club (CCFC) Academy.
- 1.2. During 2016 and 2017, Coventry and Warwickshire Award Trust (CAWAT), who own the AHC explored the option of Wasps building a new dedicated Training Centre at the AHC, which would have included an indoor pitch facility that would also have been available for community use.
- 1.3. The opportunity for Wasps to develop their Training Centre on the site meant that the expectation of a replacement facility was very quickly aligned to the delivery of the pool. Sport England, who are a statutory consultee on planning matters relating to the loss of playing facilities, indicated that they would expect to see the re-provision for community use via the proposed new indoor pitch facility.
- 1.4. Through the summer of 2017, it became apparent that Wasps were not ready to commence their proposed development and could not commit to the time line required to ensure the deliverability of the 50m pool development. It was identified that further delay would have a knock-on effect on the proposed 50m pool programme.
- 1.5. To enable the re provision of an indoor pitch facility that could be used for community and other use, alternative funding options were therefore explored to fund the building of the indoor pitch facility.
- 1.6. To meet with programme requirements, it is necessary for the planning application for the 50m pool and indoor pitch facility to be submitted by 10th November 2017.

2. Options considered and recommended proposal

There are four options for consideration:

2.1. Do Nothing (Not Recommended)

- 2.1.1. This option would in all likelihood sacrifice the delivery of the 50m swimming pool at the AHC by jeopardising current potential opportunities to secure external funding and by increasing programme costs through delaying and requiring a re-design of any proposed scheme. It would, however, retain the Indoor Pitch Facility for the future use of the community and other users.

2.2. CAWAT to borrow the funding externally for the development of the Indoor Pitch

- 2.2.1. This option would require a renewed permission from the Alan Edward Higgs Charity and a Charities Act Report in respect of any securities required by a financing institution. This would cause significant delays whilst the finance was sourced and incur additional costs in construction delays and the ongoing costs associated with maintaining the existing Coventry Sport and Leisure Centre at Fairfax Street. The funding itself may not be guaranteed through the 'isolated context' of such financing (i.e. without there being any consideration of the association with the 50m swimming pool).

2.3. CCC to build and own the Indoor Pitch facility, renting it to CAWAT or CSF

2.3.1. This option would require the permission of the Alan Edward Higgs Charity and a Charities Act Report in respect of a proposed land disposal to CCC rather than to Wasps. This would cause significant delays whilst the finance was sourced and would be a significantly more expensive scheme to incorporate all the 'stand-alone' facilities (i.e. changing, reception etc.) that would be required for it to be owned by a separate entity. There would also be additional costs incurred in construction delays, additional ongoing costs associated with maintaining the existing Coventry Sport and Leisure Centre at Fairfax Street (if seamless transition was to be secured) and it would result in additional procurement costs.

2.4. CCC to loan CAWAT the funding for building the Indoor Pitch, at a commercial rate of interest (Recommended)

2.4.1. This option would ensure that the Planning Application for the 50m Swimming Pool and the Indoor Pitch could be submitted and considered in time to maintain the programme for delivery. It would secure the delivery of the 50m swimming pool at the AHC, maintaining the programme and budgetary position and retaining the important community use of the Indoor Pitch. The loan would also provide a commercial income for CCC over and above the capital repayments.

2.4.2. If the loan is approved, during the 8 weeks of planning consideration, the funding model would be submitted to CAWAT Board for approval, in time for procurement of a contractor, appointment, stand still, mobilisation and construction, for completion by the 1st September 2018. The commencement of the 50m swimming pool construction programme could also remain on track for the 1st April 2018.

3. Results of consultation undertaken

3.1. A more detailed account of the consultation undertaken in developing the Coventry Sports Strategy 2014-2024 is included in the 'Coventry Sports Strategy 2014-2024' Cabinet Paper (Coventry City Council, 2014). This paper focuses only on those elements of the consultation that are particularly pertinent to the recommendations/considerations contained within this report.

3.2. The Emerging Vision for Sport in Coventry was developed through the review and detailed consideration of responses from the Coventry Sport and Leisure Survey; further direct consultation with local, regional and national sporting stakeholders; and extensive desktop research and analysis. This process culminated in the drafting of eight key Vision Aims designed to encapsulate the sporting aspirations for Coventry over the next ten years.

3.3. Within the eight Vision Aims of the Strategy, Vision Aim 5 seeks: "To provide a range of modern, accessible, and high-quality sports facilities."

3.4. Accordingly, assessments of the city's indoor sports facilities were also carried out, in collaboration with facility operators. These assessments provided a detailed picture of current indoor sports provision in Coventry, showing the number, location, quality and use of the city's indoor facilities.

3.5. The key findings to emerge from this **assessment** were that:

- i. the quality of indoor facilities varied greatly - from those that were of 'very poor' quality to those that were of 'very good' quality
- ii. many of the city's indoor facilities were found to be located within schools, which offered varying levels of community use

- iii. Coventry Sports and Leisure Centre and Foleshill Sports and Leisure Centre were both adjudged to be no longer 'fit for purpose'
 - iv. funding being used to support these ageing public sports and leisure facilities could be used to invest in new, modern and more accessible sports and leisure facilities
 - v. swimming pool provision across the city would need to be considered in light of the proposed closure of Coventry Sports and Leisure Centre
- 3.6. Further to the launch of the Emerging Vision for Sport in Coventry, work was undertaken with a range of stakeholders to develop the Strategic Objectives for the Strategy. Initially, 48 Strategic Objectives were drafted, although these were refined to 37 throughout the period of early stakeholder consultation.
- 3.7. In February 2014, the draft partnership 'Sports Strategy 2014-2024' was formally launched for a period of public consultation. In addition to considering the responses to the survey undertaken as part of public consultation on the draft Strategy, representations from the City of Coventry Swimming Club and the ASA resulted in the City Council, CSF and CST undertaking additional facility modelling focused on the feasibility of providing a new 50m swimming pool in the city centre.
- 3.8. During the above period of consultation, two petitions were also launched expressing opposition to the loss of a 50m pool in Coventry. These petitions were considered at the Joint Cabinet Member meeting of 23 July 2014.
- 3.9. Key Findings of the Consultation
- 3.9.1. A detailed paper outlining the results of the public consultation can be viewed at www.covsport.org.uk . The key findings of relevance to this paper are that:
- i. the strategy was very well received and there was little opposition to either the Vision Aims or the Strategic Objectives. There was agreement to each of the Vision Aims from at least 82% of respondents
 - ii. the area attracting the most objections across survey responses was the proposed loss of 50m swimming pool provision in the city. Each Vision Aim invited comments and there was also a general comments section at the end. In total, 3,022 comments were received across all sections of the survey. Of these, 1,573 were objections to the loss of 50m pool provision
 - iii. the following issues were included amongst those identified in responses that referenced concern over the loss of 50m pool provision in the city: the destabilising the City of Coventry Swimming Club, specifically including the impact of the loss of Amateur Swimming Association National Beacon Status; reduced pool capacity for club training; the displacement of current pool users; the loss of competition facilities in the city; the loss of the only current 50m competition pool in the West Midlands region; the need to provide opportunities in swimming from Learn-To-Swim through to competition squads; need to make swimming a 'Key Sport' – it is the highest participation sport in the country
 - iv. there is a need to ensure sports provision and support for disabled people. In total, 101 comments were received supporting both the need to improve facilities for disabled people and to increase participation in sport and active recreation by disabled people and/or people with long-term limiting illness
 - v. many of the respondents commented on the need for high quality facilities for people of all sporting abilities. In total, there were 250 comments relating to this, and many of these also referred to the need for facilities in neighbourhoods

- vi. there is a need to ensure provision in the neighbourhoods. Comments on this included the need to provide a pool at the Alan Higgs Centre; sports hubs with free parking are essential; provision across central and neighbourhood facilities should be complementary
- 3.10. Subsequent to the above, consultation on the design and development of the 50m swimming pool at the Alan Higgs Centre has been undertaken with key stakeholders such as Sport England, the Amateur Swimming Association (National Governing Body for Swimming) and the City of Coventry Swimming Club. The aim of this consultation process was to inform the scope of the scheme, ensure compliance with relevant design guidance and to support design and planning approval processes.

4. Timetable for implementing this decision

- 4.1. Planning permission for the 50m swimming pool and Indoor Pitch facility at the Alan Higgs Centre will have been submitted by CAWAT in November 2017 with an anticipated approval date of January 2018. If approved, the recommendation in 2.4 above will be progressed immediately with relevant due diligence of the Indoor Pitch facility business plan. The funding model through borrowing at a commercial rate would be reviewed and approved by Deputy Chief Executive (Place) and the Director of Finance and Corporate Services (in consultation with the Cabinet Member for Public Health and Sport) and the Legal Services Manager to finalise the terms and details of the loan arrangement and to manage the loan facility.
- 4.2. The funding model would also be submitted to the CAWAT Board for approval in time for the procurement of a contractor, appointment, stand still, mobilisation and construction for completion by the 1st September 2018.

5. Comments from Director of Finance and Corporate Services

5.1. Financial implications

- 5.1.1. Approval of the recommendation in this report would result in the Council providing a 40 year loan of up to £1.5m to fund the building of an indoor pitch facility at the AHC.
- 5.1.2. It is proposed that the agreement of the detailed terms of the loan is delegated to Deputy Chief Executive (Place) and the Director of Finance and Corporate Services (Section 151 Officer), in consultation with the Cabinet Member for Public Health and Sport and the Legal Services Manager on the basis that a commercial market interest rate is charged. It is anticipated that the loan would be at a fixed interest rate, with annual repayments by CAWAT.
- 5.1.3. In order to mitigate risk the Council will undertake due diligence work to:
- i. ensure that business plan for the development is robust. The plan sets out how the repayment of the loan can be financed through increased income generated by the facilities provided;
 - ii. assess the underlying financial strength of CAWAT;
 - iii. investigate other forms of security, including for example, the requirement for CAWAT to meet debt related financial covenants, or earmark reserves for the purposes of debt cover.
- 5.1.4. In addition, there are covenant restrictions over the site such that it cannot be used for commercial developments. These limitations provide the Council with assurance that the site must be used for community purposes over the longer term.

- 5.1.5. On an ongoing basis, once any loan has been provided by the Council, officers will monitor the arrangement in order to actively manage any ongoing debt repayment risk.
- 5.1.6. The loan will be treated as capital expenditure by the Council, to be resourced by prudential borrowing, with amounts set aside as Minimum Revenue Provision (MRP) in order to meet the cost of the borrowing.

5.2. Legal implications

- 5.2.1. The Council has the power to make loans under the General Power of Competence in Section 1 of the Localism Act 2011.
- 5.2.2. In order to mitigate any State Aid risks:
- 5.2.3. The loan will be provided on market terms. To this end, officers in Legal and Finance have undertaken an initial analysis using guidance from the European Commission “otherwise known as the EU Reference Rate” to get an indication of the range of what an acceptable interest rate would be to ensure State Aid compliance. This will also be strengthened by a report from an independent third party which is also being undertaken.
- 5.2.4. The Council will also be inserting relevant provisions within the loan documents to ensure the Market Economy Operator Principles are achieved in order to mitigate the risk of a state aid challenge.

6. Other implications

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

A prosperous Coventry – Vision Aim 5 of the Coventry Sports Strategy outlines the need “to provide a range of modern, accessible and high quality sports facilities in the city”. The first Strategic Objective for this Vision Aim specifically concerns future city centre leisure provision and the need “to develop city centre sports and leisure facilities that are accessible, high-quality, sustainable and of significance to the Midlands”. The Sports Strategy thereby puts leisure at the heart of city centre regeneration and promotes the city centre as a key regional destination for leisure activities and leisure tourism. The commercial success of the City Centre Destination Facility will, through the 50m pool proposals, further support investment in training and club competition facilities for swimming and water polo at the Alan Higgs Centre. It is anticipated that this will further increase external investment into the sporting infrastructure of the city.

Healthier, independent lives – Public leisure facilities play a vital role in addressing social challenges, promoting active lifestyles, increasing physical activity, reducing isolation and improving outcomes for individuals and communities. Vision Aim 1 of the Sports Strategy sets the ambition “to develop a more active, inclusive and vibrant Coventry through positive experiences in sport”. Through encouraging and supporting engagement in regular sport and/or active recreation, the Strategy aims to positively influence and contribute to the physical and mental health and wellbeing of the residents of Coventry. In particular, public leisure facilities and their operation have a key role to play in supporting the Council to deliver its public health objectives, directly supporting action to address priorities within the Joint Strategic Needs Assessment for the city. The provision of enhanced community sports and leisure facilities in the south east of the city is intended to broaden and widen participation in sport and leisure in the neighbourhoods, develop community hubs, and promote sustainable sporting pathways within sports.

Ensuring that children and young people achieve and make a positive contribution

– Investment in public leisure facilities enables and supports the provision of sporting opportunities through which many children and young people achieve and make a positive contribution. For example, the 50m pool proposals supported by the above recommendations support the City of Coventry Swimming Club in retaining Beacon Status through access to a modern 50m pool. The Club has a vibrant youth section and talent pathway, but also supports wider volunteering and opportunities through teaching, coaching and officiating.

Improving the environment and tackling climate change – The significant age and largely poor condition of Coventry Sports and Leisure Centre have resulted in it being adjudged as no longer ‘fit for purpose’. Whilst no decision has yet been made on the closure of CSLC, a modern 50m pool would offer greater energy efficiency and flexibility in usage. Furthermore, the development of such proposed facilities are predicated on a financially efficient model concerning the use of recycled savings from the closure and withdrawal of public leisure service provision from ageing and inefficient sites. This enables the existing resource to be moved from an inefficient model of subsidy to one of investment in quality, sustainable facilities and a projected revenue surplus due to the Council over the duration of the funding model.

6.2. How is risk being managed?

The 50m Swimming Pool is currently on programme and projected budget, with an application for Planning Consent ready to be submitted and the procurement of a Contractor entering its final phase.

Sport England have made it clear that a Planning Application for the 50m Swimming Pool should not be submitted without the Indoor Pitch re-provisioning shown to be part of the scheme.

The Planning Application needs to be submitted by November 10th 2017, if the 50m Swimming Pool scheme is to be delivered to programme.

Delays in the submission of the Planning Application and subsequent construction will cause an increase in costs to deliver the scheme and in the ongoing operation of the Coventry Sports and Leisure Centre at Fairfax Street.

6.3. What is the impact on the organisation?

There is no impact on Coventry City Council. The Indoor Pitch Facility will be provided by CAWAT and operated by Coventry Sports Foundation.

6.4. Equalities / EIA

Following consultation and analysis of demographic, health, sport and leisure data and survey responses for the city, an Equality and Consultation Analysis (ECA) was produced for the Sports Strategy (see Coventry Sports Strategy 2014-2024 Cabinet Report, Coventry City Council, August 2014).

With regards to the current proposals, demographic, health, sport and leisure data and public survey responses highlighted the following considerations within the ECA concerning protected groups under equalities legislation:

Vulnerable Communities (disadvantage/poverty)

- a) The pattern of participation in the city mirrors the city's deprivation patterns, with lower participation rates to be found in the north and east of the city and the higher participation rates to be found to the west and parts of the south.

Disability

- a) 4.5% of the total population of Coventry are economically inactive due to a long term illness or disability.
- b) The proportion of disabled people taking part in sport in the city is less than both national and regional averages.

Age

- a) There is a correlation between age and inactivity rates which are the highest amongst those aged 55+ (67.9%) and lowest for young adults aged 16-25 (43.3%)
- b) Cycling, swimming and athletics are characterised by an even spread throughout the age cohorts up to 64 years
- c) Young people often struggle to afford to participate in sport and active recreation as youth unemployment remains high and students and young earners are often under financial pressure.

Gender

- a) 50.3% of the local population are female.
- b) In Coventry, female inactivity (61.3%) is significantly higher than the equivalent male rate.
- c) In Coventry, the proportion of women regularly taking part in sport (15.2%) is less than half that of men (31.3%).
- d) Just under nine in ten of those taking part in keep fit exercises and six in ten swimmers are women.

The Equality and Consultation Analysis contained as an appendix to the 'Coventry Sports Strategy 2014-2024' Cabinet Paper (Coventry City Council, 2014) indicated the following potential equalities impacts with regard to the protected groups under equalities legislation which are particularly relevant to this report:

- a) The strategy was very well received and there was little opposition to either the aims or the strategic objectives. There was agreement to all eight of the vision aims from at least 80% of all respondents.
- b) A need to ensure sport provision and support for people with disabilities was highlighted in the consultation. In total 25 comments (2.3% of all comments) were received supporting the need for increased participation from people with disabilities and for facilities for the disabled.
- c) Many of the respondents commented on the need for high quality facilities for all abilities. In total there were 250 comments relating to this, and many of these also referred to the need for facilities in neighbourhoods.
- d) Linking sport to public health received 51 comments, with respondents wanting to see more done to improve the health of local people through sport.
- e) Comments relating to age were made by 46 respondents. These were almost equally spread between a need for more sporting opportunities for children and young people and older people.
- f) Very few comments were received in relation to gender, although support for Vision Aim 1 – relating to increased participation for females – was very well supported.
- g) Five comments were received supporting sport provision within neighbourhoods and how this could help those with an economic disadvantage participate more in sport.

6.5. Implication for (or impact on) the environment

Environmental Management

The Alan Higgs Centre is operated by Coventry Sports Foundation, who currently manage the environmental aspects of the 80-acre site through a partnership with the Living Environment Trust (LET). LET are responsible for the environmental, ecological and habitat management of the site and would therefore be contracted by the Foundation to oversee and manage / mitigate the environmental impact of the proposed project through the pre-construction, construction and operational phases.

During Construction

Construction would be undertaken in accordance with Secured By Design principles. Modern construction materials would be utilised and would present a significantly lesser impact on the environment than materials that were historically used. Site Waste Management techniques would be utilised and off-site manufacture would be prioritised wherever possible, thereby reducing reliance on water, minerals and other natural resources. Local contractors would be prioritised where appropriate and local specialised sub-contractors, suppliers and labour sources would also be utilised, wherever possible. If approved, the demolition and disposal of building materials from the affected areas of the existing Alan Higgs Centre would require an approved risk management and methodology strategy.

6.6. Implications for partner organisations?

The Coventry Sports Strategy 2014-2024, Coventry Indoor Facilities Strategy 2014-2024 and Coventry Aquatics Strategy 2014-2024 are partnership documents developed through consultation with a range of stakeholders. Approval and early implementation of the above strategies have given confidence to external funders that the city has clear objectives and priorities for sport to 2024. Further commitment to investing in sport and the implementation of the Strategy should assist partners when applying for external grant funding to deliver sport in the city.

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Public report Cabinet Report

A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains information relating to the financial and business affairs of any particular person (including the authority holding that information) and the amount of expenditure proposed to be incurred by the Council under a particular contract for the supply of goods or services. The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

Scrutiny Co-ordination Committee
Cabinet

22 November 2017
28 November 2017

Name of Cabinet Member:

Cabinet Member for Adult Services – Councillor Abbott

Director Approving Submission of the report:

Deputy Chief Executive (People)

Ward(s) affected:

All

Title:

Preventative Support - Adult Services

Is this a key decision?

Yes – the proposals in the report will affect the whole city and involve financial implications in excess of £1m

Executive Summary:

The delivery of effective preventative support is an important element of supporting people early in order to maintain their independence and prevent or reduce the need for social care or health support. Providing support in this way is a key element of the strategy for Adult Social Care as well as being enshrined in the Care Act 2014.

Preventative support is currently provided by a range of voluntary and third sector organisations who are commissioned by both the City Council and the Coventry and Rugby Clinical Commissioning Group (CRCCG) through a range of contracts and grants all of which are due to expire in March 2018.

In order to ensure that the support provided beyond the end of these existing arrangements remains focused and delivers positive outcomes for the people of the city within the available resource, the City Council and CRCCG undertook a programme of work to review and then re-commission support across four priority groups: carers, people with physical impairments or dementia, mental health conditions and adults with learning disabilities. Voluntary and Third

Sector providers were fully engaged in the process of the review including the setting of priority areas and outcomes. Stakeholder views were actively sought to support the development of proposals for future services.

As well as targeting support on priority groups the review work also sought to deliver a saving for the City Council of £0.5m for delivery in 2018/19 from the existing Council spend of £3.01m per annum as part of the budget setting process in February 2017.

This report details the outcome of the review work and the proposed changes for the support across each of the priority areas and, following a grant application process, seeks approval to enter into grant arrangements for a period of five years.

Recommendations:

Scrutiny Co-ordination Committee is recommended to:

1. Consider the proposals contained within the report and forward any comments to Cabinet for consideration at their meeting on 28 November 2017

Cabinet is recommended to:

1. Consider any comments and/or recommendations from the Scrutiny Co-ordination Committee
2. Approve the award of community based preventative support grant funding to 12 organisations for the delivery of 11 grant proposals for a period of five years from 1 April 2018

List of Appendices included:

Appendix A - Equality Consultation Analysis

Background papers

None

Other useful documents

None

Has it been or will it be considered by Scrutiny?

Yes. Scrutiny Co-ordination Committee – 22 November 2017

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

No

Will this report go to Council?

No

Report title: Preventative Support – Adult Services

1. Context (or background)

- 1.1 Recent policy changes and the introduction of the Care Act 2014, along with the development of local strategies provides an opportunity to consider whether current funding of preventative support provided by the voluntary and third sector to adults and older people living in the community is as effectively targeted as it could be.
- 1.2 Enabling people to be as independent as possible is a fundamental principle to the delivery of Adult Social Care in Coventry. The provision of effective preventative support enables this by supporting people to access alternatives to statutory funded services. The Care Act itself establishes a general responsibility for prevention and the reduction of needs for care and support and the promotion of well-being.
- 1.3 Both the City Council and the Coventry and Rugby Clinical Commissioning Group (CRCCG) commission preventative support to a variety of groups through a series of contracts and grant aid agreements that expire in March 2018, including carers' support, advocacy, housing related support, money management and information and advice and counselling support.
- 1.4 In order to ensure the support that is provided beyond the end of these existing arrangements remains focussed and delivers positive outcomes within the available resource the City Council and CRCCG undertook a programme of work to review and then re-commission support across four priority groups – a) carers, b) people with physical impairments or dementia, c) people with mental ill health and d) adults with learning disabilities.
- 1.5 The work was also undertaken with the additional objective of achieving a savings target of £0.5m for the City Council from a spend level in 2017/18 of £3.01m. Previously, and as part of earlier reviews, some organisations had already experienced reductions in funding. In total 36 different services from 22 providers were included in this review.
- 1.6 The scope included current support provision e.g. carers' support, housing related support, information and advice, mental ill health support and a broad range of community support to help build resilience. The review did not include Council expenditure on domestic violence, homelessness, advocacy, money management services or the foodbank.
- 1.7 A collaborative approach to the review was taken, involving voluntary and third sector providers in the co-production of future provision and commissioning arrangements. Three workshops were held with providers between November 2016 and January 2017 seeking their views and input on a range of different areas, including: the appropriateness of identified priority groups; flexibility within arrangements to adapt to changing circumstances: duration of agreements and monitoring arrangements for successful organisations.
- 1.8 Feedback from these sessions indicated what was required in order for the Council and the CRCCG to achieve the best possible outcomes:
 - Any funding application process should be as simple and straightforward as possible to ensure that smaller organisations are supported to apply and provide adequate time for applications.

- Flexibility in arrangements with a focus on outcomes that enable movement in response to changing needs.
 - Some stability of funding, providing time to adjust to new arrangements and recognising that this supports organisations' ability to invest in developing new models
- 1.9 Input was also sought from the Adult Social Care Stakeholder Reference Group, CRCCG patient representatives and professionals working with the services. Feedback indicated a preference for a range of support options that avoid duplication, including support that enables emergency response for carers, support for older people to access community support and support for people who hoard.
- 1.10 Using the outcome from this engagement, a grant application process took place from 24 April 2017 to 30 June 2017, as a result of which a total of 24 applications were received. A two stage evaluation process was used including representatives of both the City Council and CRCCG. 17 applications progressed to the second stage which involved face-to-face meetings, enabling panels to explore how proposals would be delivered in order to meet the required outcomes. These meetings also focused on use of resources which in some cases resulted in organisations revising the original costs submitted. 5 further applications were unsuccessful at this stage and 1 was withdrawn resulting in 11 applications from 12 providers being recommended for award. A summary of the successful grant applications illustrating changes to the support offer and the value of proposed grants to be awarded is detailed in the private report on this agenda.
- 1.11 Voluntary and third sector organisations that are successful for grant funding will be expected to regularly provide outcome monitoring evidence, which can be readily submitted to the Council and CRCCG on request or at specified intervals during each financial year. The Council and CRCCG intends to further develop monitoring arrangements in collaboration with successful organisations during the period of implementation.
- 1.12 Many existing providers are recommended for the award of grants as a result of this process. This will support continuity and market stability and in many cases existing support offers will remain, albeit on reduced funding levels. There was no indication that any organisation will become unsustainable as a direct result of the grant process, regardless of whether they are successful or unsuccessful. Where existing providers did not apply or their application for grant funding was unsuccessful, the impact of this has been assessed and plans are in place to deliver transition arrangements for people currently accessing support.
- 1.13 Taking each priority area in turn, paragraphs 1.14 to 1.23 outline the range and type of support to be made available as a result of the work undertaken.
- 1.14 **Supporting Carers to live well whilst caring**
The proposals will enable carers in Coventry to access a range of services that maintain and add to the preventative support offer for carers. For example, a 'Carers Wellbeing Service' will strengthen the existing support offer to meet demand through a package of early identification and awareness of carers' needs. This will include:
- One-to-one support
 - Information and advice
 - Carers' peer support groups
 - Emergency support

- Urgent support to prevent carer crisis
 - Carers' training
 - Carers' short breaks
- 1.15 In addition, training and awareness raising options for carers will continue to be provided with a focus on building community resilience through greater stimulation of peer-support networks.
- 1.16 Outside of this grant process carers living in Coventry can continue to access a broad range of assistance to maintain their caring role, and their own health and wellbeing. This assistance includes residential respite, carer direct payments, primary care support and signposting through GP surgeries, access to the Admiral Nursing Service that helps carers to care for people with complex needs, and the Carer Aware online training in respect of carers' rights and needs. Carers' assessments will also continue to be provided through Heart of England Carers Trust.
- 1.17 **Supporting people with physical impairment and those with dementia to remain independent and live well**
The proposals will strengthen the range of existing support options for people with physical impairments and dementia along with assistance for their families, relatives and carers. The main support elements in this priority group cover:
- Targeted interventions for more complex needs including dementia and sensory impairments
 - Information and advice
 - One-to-one and outreach support
 - Peer support groups
 - Health and wellbeing activities
- 1.18 The support offer for people with sensory impairment will also be improved through targeted help and interventions for people to build independent living skills.
- 1.19 **Supporting people with mental ill health to live well**
The proposals are expected to maintain support levels and meet existing demand whilst also enabling additional flexibility and innovation to target support more effectively for people with mental ill health. The main types of support include:
- Accommodation-based housing related support and outreach capability
 - Community short-term and intensive support
 - Targeted one-to-one interventions
 - Peer support, community involvement and advocacy
- 1.20 A central part of the preventative offer will be a collaborative model of support delivered across three local organisations, which will enable more joined-up and flexible options for people when they need it most alongside the ability to outreach into specific communities.
- 1.21 In addition, targeted early help for people with hoarding behaviours will be provided which will enable people to live safe and well in their own homes.
- 1.22 **Supporting adults with learning disabilities to live fulfilling lives**
The proposals will deliver a range of support to enable people with learning disabilities to develop skills, confidence, participation and resilience within the community. Support elements include:

- Targeted one-to-one and peer support
- Engagement with and training for local businesses to provide opportunities and safe spaces within the community for people with learning disabilities
- Housing related floating support for people with learning disabilities to maintain their own home in the community

1.23 There will be change to the provision of accommodation-based housing related support largely as a result of 4 existing providers not applying for a grant. Decommissioning arrangements are in progress to ensure that those affected by this continue to be supported in the most appropriate way, dependent on individual needs. The ongoing delivery of housing related floating support is expected to meet any existing needs along with capacity to support emerging demand.

2. Options considered and recommended proposal

2.1 Option 1 – Recommended option – Award grants

It is recommended that the Council awards grants to the organisations and at the values specified in the private report on this agenda. As it both enables the targeting of resources to identified priority groups and the delivery of the £0.5m annual savings target required from this work.

2.2 Option 2 – Not recommended - Implement a percentage reduction

The Council could seek delivery of the annual savings target of £0.5m through applying an apportioned reduction to all existing arrangements with the voluntary and third sector and extend current arrangements on this basis. This would deliver the savings target but would not enable the refocusing of resources and the targeting of resources on priority groups. Equally an apportioned reduction takes little account of organisations ability to absorb the reduction or the impact of this and therefore can create sustainability risks.

2.3 Option 3 – Not recommended - Extend existing arrangements on existing terms and conditions

The Council could extend and continue with existing arrangements. Although this would provide the most stable position for existing organisations and people that use their services, this would not enable the targeting of resources on identified priority areas and would not enable the annual savings requirement of £0.5m to be met.

2.4 Option 4 – Not recommended – Undertake a formal tender

The Council could undertake a formal tender process for preventative support as opposed to the award of grants. Progressing this route would put at risk the sustainability of many existing local voluntary and third sector organisations and therefore undermine many local organisations who use their own resources as well of funding from statutory bodies to support people in Coventry.

3. Results of consultation undertaken

3.1 A formal consultation has not been undertaken. Instead, a commissioning approach was designed and progressed in collaboration with the voluntary and third sector. This co-production was initiated in November 2016 and continued up to the point of the commencement of the grant application process.

3.2 Stakeholder feedback regarding future provision of preventative support was also sought. This indicated a preference for a range of support options that avoid duplication including support that enables emergency response for carers, support for older people to reduce their social isolation and support for people who hoard.

4. Timetable for implementing this decision

4.1 If approved, grants will be awarded to successful providers with new arrangements commencing from 1 April 2018.

4.2 Planning and preparation to implement new support arrangements will take place between 1 December 2017 and 31 March 2018. This will allow organisations the opportunity to adjust delivery and funding models, inform existing people receiving support of any changes and communicate the new arrangements.

4.3 8 current providers did not apply for grant funding, which includes 4 providers of housing related support for people with learning disabilities and a provider of a home maintenance and handy man service. Therefore decommissioning arrangements for this provision are in progress, focused on ensuring that people continue to be supported in the most appropriate way, dependent on individual needs.

5. Comments from the Director of Finance and Corporate Services

5.1 Financial implications

The grant award process proposes to award £2.51m of resources to 12 providers. This is funded jointly across the Council and Coventry and Rugby Clinical Commissioning Group; £1.76m and £0.75m respectively. The process delivers £0.5m of savings, meeting the target set in the February 2017 budget report.

5.2 Legal implications

The Care Act 2014 makes it clear that in performing its functions under the Act,

“The general duty of a local authority, in exercising a function ... in the case of an individual, is to promote that individual’s well-being”.

The Act also introduced a specific requirement for local authorities to focus on the prevention, reduction or delay in development by adults in its area of needs for care and support, and by carers in its area of needs for support. The local authority has considerable discretion in how it chooses to meet this responsibility so as to be able to flexibly respond to the specific requirements of adults and carers in its area.

Public authority decision makers are under a non-delegable ongoing duty to have regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic (disabilities, age, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation). (Public sector equality duty, s 149(1) Equality Act 2010). Decision makers must be consciously thinking about these aims as part of their decision making process, with rigour and an open mind. The duty is to have "due regard" not to achieve a result, but to the need to achieve these goals and consideration must be given to the potential adverse impacts and the measures (if any) that are available to minimise any discriminatory effects. Members must therefore ensure that they read all relevant papers to enable them to assess the risk and extent of any adverse impacts and the

ways in which any such risk can be eliminated. This requires more than just an awareness of the equality duty, it requires rigorous analysis by the public authority, beyond broad options.

The proposed grant funding does not breach state aid regulations as it can be argued to fall within the local aid exemption.

6. Other implications

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

Implementation of a new community based preventative support grant and agreements will make a positive contribution to the delivery of the Council's priorities, particularly in relation to: citizens living longer, healthier, independent lives; support improved health and wellbeing and support the City to reduce health inequalities.

6.2 How is risk being managed?

A project risk register has been established for this programme of work. Key current risks identified include managing the decommissioning progress for the housing related support providers who did not apply for future funding and supporting successful organisations to manage demand for community-based preventative support. Risks will continue to be identified, mitigations sought and impact managed through existing processes.

As requirements for a grant cannot be as prescriptive as a contract awarded as an outcome to a formal tender process providers will not be contractually obliged to deliver the services. However, clear guidelines were followed when evaluating applications to ensure that future support from the voluntary and third sector will meet Council and CRCCG objectives. Should any provider not deliver the grant outcomes required the Council would have the option to remove or reduce the grant.

6.3 What is the impact on the organisation?

None

6.4 Equalities / EIA

The voluntary and third sector in Coventry currently supports people with a range of protected characteristics. An analysis of equality impacts has been completed to understand the impact that community based preventative support grant awards will have on people currently in receipt of support as well as those who may need support in the future. An Equality and Consultation Analysis (ECA) document is appended to this report in Appendix A. A focus on targeted support and enabling greater community resilience through future provision is expected to mitigate any negative impacts. This will be monitored as part of overseeing delivery and outcomes.

6.5 Implications for (or impact on) the environment

None

6.6 Implications for partner organisations?

The adult services community based preventative support grant is specifically concerned with the voluntary and third sector in Coventry. The review of current support and planning of future provision has been completed in collaboration with the voluntary and third sector organisations who will be affected by the outcome of the process.

Undertaking this work jointly with the CRCCG and entering into one agreement for both organisations (as opposed to two) furthers the integration of health and social care.

Report author(s):

Name and job title:

Michelle McGinty – Head of Programme Delivery

Directorate:

People

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Enquiries should be directed to the above person.

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Finance: Ewan Dewar	Finance Manager (People)	Place	23/10/17	01/11/17
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Director: Peter Fahy	Director of Adult Services	People	23/10/17	01/11/17
Gail Quinton	Deputy Chief Executive (People)	People	30/10/17	31/10/17
Members:				
Councillor Faye Abbott	Cabinet Member for Adult Services		03/11/17	06/11/17

This report is published on the council's website:
www.coventry.gov.uk/councilmeetings

Appendices

Appendix A - Equality Consultation Analysis

Coventry City Council Equality and Consultation Analysis (ECA) Form

In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Part 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Gemma Tate

Name of Service Area/Proposal: Preventative Support – Adult Services

Head of Service: Michelle McGinty / Jon Reading

Date of completion: July/August 2017

Background to the planned changes

- 1. What is the background to the planned changes? Why is this change being considered? *If further information is available on the different scenarios that have been considered as part of this work, provide a link to the public document which contains this information.***

The City Council (Adult Social Care) and Coventry and Rugby Clinical Commissioning Group (CRCCG) have been undertaking a review of voluntary and third sector preventative support currently commissioned by both organisations.

The purpose of the review was to reprioritise voluntary and third sector spend and achieve a £500k Council saving for delivery by 2018/19, as agreed in the Council's budget setting process in February 2017.

This review has provided the opportunity to engage with the sector to develop how future community-based preventative support is delivered in Coventry. The aim is to commission and to invest in effective preventative support for people most in need: to stay independent, build their resilience and live well for as long as possible. The support will be time-limited and focused on providing a short-term intensive period of support with the flexibility for people to drop in and out of support when required.

Under the Care Act 2014 there is a general responsibility for prevention and well-being. In addition, effective prevention can support the long term viability of social care and can also play a key role in supporting people to access alternative support to statutory funded services.

Current services include a range of preventative support to a variety of groups across different service areas, including information and advice, carers' support, housing related support and short term one-to-one support. These services are been commissioned over many years and whilst some savings had been made in previous years, including through the 'A Bolder

Coventry City Council Equality and Consultation Analysis (ECA) Form

Community Services' Programme (ABCS), models of service delivery had not significantly changed.

The scope of the review has been refined during the engagement phase and a total 22 current providers are included this review. The engagement phase resulted in the decision by the City Council and CRCCG to terminate all current agreements and re-commission support by a grant giving process called the Community-based Preventative Support Grant with a total of £2.51m available (City Council £1.76m and the CRCCG £0.75m). This figure includes the reduction in funding by the City Council. All voluntary and third sector organisations that meet the requirements of grant will be able to apply for funding.

The priority groups identified are:

- Supporting carers to live well whilst caring
- Supporting people with physical impairments and those with dementia to remain independent and live well
- Supporting people with mental ill health to live well
- Supporting adults with learning disabilities to live fulfilling lives

The priority groups identified above are the direct result of a shared agreement with the sector developed through a series of three co-production workshops held in November and December 2016 and January 2017 (more detail is described in question 3 below.)

The commissioning of the Community-based Preventative Support Grant is underpinned by an Outcomes framework for delivery of support.

2. Who do you need to consider as part of this ECA? *stakeholder analysis

The following stakeholders would need to be considered:

- Current organisations who receive funding from the City Council and/or CRCCG,
- Potential new organisations who could apply for funding
- Current and potential service users and carers
- Adult social care operational teams
- Wider partners across the health and social care sector

Pre- Engagement Period

This section refers to any activities that took place (such as briefings, meetings, workshops, scoping exercises etc) with stakeholders before the formal consultation period.

3. What engagement activities took place prior to formal consultation and what feedback was received in relation to equality issues?

The proposal to reduce voluntary and third sector spend by adult social care was part of the 2017/18 budget proposals which were consulted upon as part of the Council's budget setting process. Therefore no specific consultation was required for this piece of work. The approach taken

Coventry City Council Equality and Consultation Analysis (ECA) Form

was to engage with the sector at the earliest opportunity in order for them to be actively involved in and harness their expertise in planning the future direction of community-based preventative support.

The review of voluntary and third sector support has been undertaken via a series of co-production workshops with current providers of support and other voluntary and third sector organisations who have an interest in this area and could potentially apply for funding. Workshops were held in November and December 2016 and January 2017.

The workshops focused on:

- Developing a shared agreement on the priority groups
- Developing high level strategic outcomes
- Developing specific priority group outcomes

In order for the Council and CRCCG to understand further the potential impacts of reduced funding for community based preventative support, Voluntary and Third Sector Organisations were asked as part of the application process for the grant to provide evidence of the potential negative impact of the budget reduction. In addition, organisations were asked to highlight the potential benefits if the current level of funding was maintained.

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect **protected groups**. These groups are:

Age
Disability
Gender
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
Sexual Orientation

The **three aims of the general duty** require that a public authority, in the exercise of its functions, must have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

Note – when identifying potential impacts below, please only include impacts that may exist over and above general impacts that may affect the wider community/population. For example, a reduction in grant to Coventry Citizens Advice

Coventry City Council Equality and Consultation Analysis (ECA) Form

would affect all service users through a reduced level of first line advice being available to all – but it would affect the following groups more; age, disability, gender and race as they represent a larger proportion of the clients who use the advice service.

4. **Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps (if any) could be taken to reduce any negative impact that has been identified. NB. Only include realistic mitigating actions that could be delivered.**

People with the following protected characteristics will be affected by the way support is commissioning from the Voluntary and Third Sector:

- Age – adults aged 18+
- Disability – adults and older people with disabilities, including long term conditions.
- Race – some current service provision is focused on different BAME groups, for example the Asian and African Caribbean communities

No disproportionate impacts have been identified for the following protected characteristics gender, gender reassignment, Marriage/Civil Partnership, Pregnancy/Maternity, Religion/Belief and Sexual Orientation

Overarching impacts

The overarching aim of the Community-based Preventative Support Grant is for voluntary and third sector organisations to provide flexible support within communities for people most in need that keeps them independent, healthy and living well. This is reflected in the priority groups that will be supported via the grant as outlined in response to question 1.

By redefining the types of support available from the voluntary and third sector organisations there will be a positive impact for the priority groups. The grant intentions are that funding is invested directly into front line interventions through flexible models of support which means that people can access support as and when needed.

The Council funding reduction will potentially have a negative impact on some organisations which will potentially support less people under new arrangements. Organisations who are successful in obtaining grant awards will, as part of their agreements, be working to increase resilience within communities, creating opportunities for people to increase their support networks and over time be able to offer informal support to others. It is expected these activities, in part, will mitigate some of the impact of the budget reduction.

5. **Are there any other vulnerable groups that could be affected? i.e. deprivation, looked after children, carers.**

Also include any information about the health/Marmot implications of this proposal. Contact Georgia Faherty (georgia.faherty@coventry.gov.uk or tel. 7683 1950) or Hannah Watts (hannah.watts@coventry.gov.uk or tel. 7683 3973) in Public Health for more information.

Any reduction in services provided for vulnerable individuals poses a risk of increasing health inequalities, so the identification of the priority groups for grant funding is a positive move towards ensuring the most vulnerable people are still able to receive preventative support. The potential reduction in numbers of people who will be supported presents a risk

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that some people who are reliant on these types of services may not be able to access them in the future. Mitigation for this risk is through the development of community resilience and assets, and ensuring that those individuals who are not eligible for services are signposted to alternative options. It will be important that monitoring of the new services takes account of not only those using the services, but also any reduction in numbers from those previously using support and investigation of the outcomes for that group to ensure that those just above the eligibility criteria are not disproportionately disadvantaged.

Carers of adults and older people are one of the priority groups for grant funding. Therefore carers will continue to be supported in line with the Multi-agency Carers Strategy which was agreed earlier this year.

The support offered via the grant will be for adults and therefore no impact on looked after children is envisaged.

The successful organisations who obtain grant funding will be expected to work across the City and where possible utilise community venues across the city, including in more deprived areas. Some support models will offer people support from their own homes and/or within GP surgeries.

The physical impairment and dementia priority group will also support people with long term conditions. We know that people from more deprived backgrounds are more likely to live with long-term conditions. This means they will have a range of preventative services available to offer support if required.

6. What are the gaps in evidence? Can this be addressed during the consultation stage? If so, how?

The starting point for this review was to move towards a model of commissioning new arrangements by an outcomes framework rather than more traditional approach of setting targets for the numbers of people to be supported. Therefore we have not reviewed any current data in respect of the types of people who are currently accessing support from these organisations, as the majority of the data is held by the organisations concerned and not the Council/CRCCG

We have, as part of the engagement workshops asked organisations to use their own information to identify any gaps in service delivery and how these might be addressed within applications for grant funding.

As part of the evaluation of the grant applications a small focus group of people who have an interest in voluntary and third sector and/or have used these types of services before looked at the applications that met the minimum standard for a proposal discussion meeting. Any questions and/or feedback from the group will be fed into the proposal discussion meetings. A key purpose of this meeting was to explore any potential gaps in support for people within the priority groups.

Following grant awards each individual organisation will be required to gather monitoring information, including data which will support further equalities analysis post-implementation of the new support offer. This will enable the Council and funded organisations to develop any further mitigating actions, if required.

**Coventry City Council
Equality and Consultation Analysis (ECA) Form**

7. What are the likely impacts of this project/review on staff from protected groups?

There are no Council or CRCCG staff affected by this review: any affected staff are employed by the Voluntary and Third Sector organisations. More understanding of any impact of staff from protected groups will be known once proposed officer recommendations for grant awards are known.

The Council and CRCCG will work closely with organisations during the transitional period to new arrangements to understand any impacts on either staff or current service users within the protected groups.

Coventry City Council
Equality and Consultation Analysis (ECA) Form

Part 2

This section should be completed AFTER the consultation stage has been concluded.

Author of this document: Gemma Tate

Date of completion: September/October 2017

Post-Consultation

8. Referring to the information detailed in question 4 of Part 1 of the ECA Form, state if the consultation has confirmed the potential impacts identified that were identified. Also detail below any additional information about potential impacts that has been highlighted during the consultation.

No formal consultation has been carried out for this piece of work. This section of the ECA will assess the equality impact for the applications that the Council/CRCCG have received for the Community-based Preventative Support Grant. The focus will be on assessing any equality impacts as a result of proposed grant awards for both successful and unsuccessful organisations.

This ECA will also assess any equality impact upon service users who are supported by current providers who have not applied for future funding as this will mean these organisations will no longer receive funding from the Council/CRCCG from 31 March 2018.

Overarching impacts

The overarching positive and negative equality impacts outlined in part 1 remain valid.

One of the questions on the grant application form was for voluntary and third sector organisations to outline the potential impacts of the proposed budget reduction. In summary the following **potential** impacts were identified by them:

- A reduced budget would could result in fewer people being supported at a time when the prevalence of certain long-term conditions is growing, for example dementia and mental health conditions
- Staff numbers and/or capacity might be reduced in some organisations, leading to the potential loss of highly trained staff
- Small organisations that deliver bespoke, unique services, for example to Black Asian Minority Ethnic (BAME) groups, could become unsustainable without continued funding, leaving a potential gap in service delivery
- Less people might receive support with benefit claims, resulting in lost income for the individual but also to the city.
- Increased pressure on statutory services (adult social care, health services and homelessness.)

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Following conclusion of the evaluation of the grant application process, the following impacts have emerged.

Current providers not applying for future funding

8 current providers did not submit applications for future funding. By the nature of the support provided people with disabilities are the group of people who will be most affected. The Council/CRCCG will be working with all organisations to understand the impact of these decisions. It is anticipated that there will be no or very limited impact in relation to 3 of these organisations as they only received a small amount of funding and will continue to offer the support they currently provide.

The Council is working with 1 organisation to ensure the service is phased out appropriately and where possible people who have used the service are signposted to other types of information/advice and support that might be available to them. The service ceased on 30 September 2017. At the time the service ceased all open cases had been closed.

The remaining 4 organisations currently support 32 people; 9 (28%) of whom have previously had an assessment and currently have eligible health and social care needs.

In terms of equality characteristics, all people receiving support from these 4 organisations will have a disability. There are 25 males and 7 females. The age range varies, with the majority (23) of people aged 50 and over. The majority of people (21) identify as White British. Note the Council does not currently hold equality information for all individuals affected.

Assessments and/or reviews are in progress to determine whether people currently receiving this type of support, who are not currently known to adult social care or people who have not had a recent needs assessment, have any eligible care and support needs in line with the Care Act. Similar types of support will still be available following Grant Awards and where required people will be transferred to a new provider and/or other types of support to meet their needs.

Where people are not eligible for social care support they will receive information and advice about alternative sources of support.

Current providers that have not been recommended for future funding

Overall, 5 providers have not been recommended for future funding, of which 3 are current providers. For 1 provider their unsuccessful application was for a small amount of additional funding for raising awareness of mental ill health and infrastructure costs (e.g. IT equipment) to support this. There will be no disproportionate equality impacts of this decision, as activities of this nature will be still be carried out by this organisation, in collaboration with other providers supporting people with mental ill health.

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2 providers currently provide floating support services. 1 provider is primarily contracted to support 47 older people aged 60+ and the other supports 52 people with mental ill health. The Council does not currently hold any equalities data in respect of these individuals.

Following notification of being unsuccessful for grant awards, the Council will work with both providers, the people receiving support and their families to determine whether people currently receiving this type of support have any eligible care and support needs in line with the Care Act. Similar types of support will still be available following Grant Awards and where required people will be transferred to a new provider and/or other types of support to meet their needs.

Where people are not eligible for social care support they will receive information and advice about alternative sources of support.

Positive Impacts – new types of support for some of the priority groups

Some of the organisations that have been recommended for funding are new organisations who will be able to offer specialist support to people with visual and hearing impairments and people who hoard. There is currently limited preventative support for these groups of people.

Supporting people who hoard has been an increasing issue for operational staff within adult social care. Hoarding has recently been recognised as a mental health condition under the International Classifications of Diseases (ICD) and is considered within the definition of self neglect under the Care Act 2014.

Additionally some successful organisations will use volunteers as part of their overall support offer and thus create more peer-to-peer support options.

Outcome of equality impact

9. Indicate which of the following best describes the equality impact of this project/review:

- There will be **no** equality impact if the proposed option is implemented
- There will be **positive** equality impact if the proposed option is implemented
- There will be **negative** equality impact if the proposed option is implemented but this can be objectively justified
- There will be both **positive and negative** impacts if the proposed option is implemented

Summary of ECA

Write a paragraph below which summarises the key aspects of this ECA.

Coventry City Council Equality and Consultation Analysis (ECA) Form

NB. - This paragraph will be included in the Decision-making Report as well as the end of year ECA report

Where specific objectives have been set for any protected groups around equality impact, also include this information below.

The Community-based Preventative Support Grant will have a positive impact on adults and older people with disabilities, as they will have access to targeted support which will enable them to build their resilience and access support within their community as and when they need it, with an increasing focus on direct one-to-one support. This will enable them to remain independent and live well for longer.

All successful organisations will be expected to work with adults aged 18+ and people from all ethnic backgrounds. Some existing organisations who specialise in supporting people from BAME communities with mental ill health will continue to offer support to this group of people, working closely with other agencies. In addition there will be more support available to people with sensory impairments and people who hoard.

The potential reduction in numbers of people who will be supported presents a risk that some people who are reliant on these types of services may not be able to access them in the future. Mitigation for this risk is through the development of community resilience and assets, and ensuring that those individuals who are not eligible for services are signposted to alternative options. However early indications from the grant application process is that some successful organisations have re-configured their support models to be able to support similar numbers of people each year.

The transition period to the new arrangements will enable those providers who have not applied for funding or those who have been unsuccessful to work alongside affected individuals, their families and social workers to identify any ongoing care and support needs and how these can be met.

The Strategic Commissioning Team will be working closely with both successful and unsuccessful organisations to monitor any equalities impacts and identify any further mitigating actions.

Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjanian (wendy.ohandjanian@coventry.gov.uk tel. 7683 2939)

Jaspal Mann (jaspal.mann@coventry.gov.uk tel. 7683 3112)

Version Control

Version	Date	Summary of changes (Author)
1.0.0	26.05.16	Initial release (Jaspal Mann)



A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it refers to the identity, financial and business affairs of an organisation and the amount of expenditure proposed to be incurred by the Council under a particular contract for the supply of goods or services.

Cabinet
Council

28th November 2017
5th December 2017

Name of Cabinet Member:

Cabinet Member for Jobs and Regeneration – Councillor O’Boyle
Cabinet Member for Community Development – Councillor Bigham

Director Approving Submission of the report:

Deputy Chief Executive(Place)

Ward(s) affected:

St Michael’s

Title:

Heritage Framework Agreement

Is this a key decision?

Yes – the proposals within the report have financial implications in excess of £1million

Executive Summary:

The report is seeking approval for the Council to enter into a Strategic Partnership with the Historic Coventry Trust (HCT) for the transfer of the Councils historical properties.

The Framework Agreement will establish an exclusivity period of five years for HCT to acquire the properties. To activate the transfer, the HCT will have to submit a robust business case on a case by case basis to the Council for approval, satisfying set criteria illustrating how the properties can be managed and maintained for the long term benefit of the people of Coventry.

The aims of the HCT (a registered charity) are to raise funds for the historic properties for their restoration and reuse, thereby securing the assets for future generations whilst improving and building upon the City Centre offer as a cultural and tourist destination.

The Strategic Partnership will guarantee and secure the long term future for the properties to be restored and reused. The properties selected are the Council owned properties within the proposed Burges Townscape Heritage Scheme, Charterhouse Heritage Park, Drapers Hall, Anglican and Non-Conformist Chapels located in London Road Cemetery, Lychgate Cottages (3-5 Priory Row), Swanswell & Cook St Gatehouses, Whitefriars Gatehouse and adjoining land & Whitefriars Monastery and adjoining land.

Recommendations:

Cabinet is requested to recommend that the Council:

- (1) Approve that the Council enter into the Framework Agreement with the Historic Coventry Trust (HCT) for a period of five years.
- (2) Delegate authority to the Deputy Chief Executive (Place) in consultation with the Cabinet Member for Jobs and Regeneration to transfer identified assets to HCT subject to receipt of a satisfactory business case and secured funding satisfying the set criteria
- (3) Appoint the Cabinet Member for Community Development to the Board of Trustees for the Historic Coventry Trust.
- (4) Delegate authority to Legal Services Manager to execute all the necessary documentation to give effect to all the subsequent transfers.
- (5) Approve the set criteria that the HCT must satisfy in their business case before the historic asset transfer can be completed as set out in paragraph 2.1.14
- (6) Delegate authority to the Deputy Chief Executive (Place) in consultation with the Cabinet Member for Jobs and Regeneration, to make any subsequent variation in relation to the terms of the proposals in this report.

Council is requested to:

- (1) Approve that the Council enter into the Framework Agreement with the Historic Coventry Trust (HCT) for a period of five years.
- (2) Delegate authority to the Deputy Chief Executive (Place) in consultation with the Cabinet Member for Jobs and Regeneration to transfer identified assets to HCT subject to receipt of a satisfactory business case and secured funding satisfying the set criteria.
- (3) Appoint the Cabinet Member for Community Development to the Board of Trustees for the Historic Coventry Trust.
- (4) Delegate authority to Legal Services Manager to execute all the necessary documentation to give effect to all the subsequent transfers.
- (5) Approve the set criteria that the HCT must satisfy in their business case before the historic asset transfer can be completed as set out in `paragraph 2.1.14
- (6) Delegate authority to the Deputy Chief Executive (Place) in consultation with the Cabinet Member for Jobs and Regeneration and Community Development, to make any subsequent variation in relation to the terms of the proposals in this report.

List of Appendices included:

Location Plan

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 – 5th December 2017

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Report title: Heritage Framework Agreement

1. Context (or background)

1.1 The Council own a number of historically important heritage assets that are under used and require significant capital investment. The Council neither has the funds or the expertise to restore the properties and at present, the condition of these buildings is deteriorating. It has been estimated that capital expenditure in excess of £3million would be required to ensure that they would be put into a state of reasonable order.

1.2 To save and protect these assets for future generations, it has been proposed to transfer identified heritage assets to the Historic Coventry Trust (HCT) to refurbish, maintain and manage. The HCT will be able to secure grant funding to enable them to refurbish and bring these properties back into use.

1.3 Subject to the proposed transfer being approved, the operation and management of the Historic Assets will be maintained and sustained by the Historic Coventry Trust.

1.4 The properties selected are the:-

- Council owned properties in Burges
- Charterhouse Heritage Park
- Drapers Hall
- Anglican & Non-Conformist Chapels in London Road Cemetery
- Lychgate Cottages (3-5 Priory Row)
- Swanswell & Cook St Gatehouses
- Whitefriars Gatehouse and adjoining land
- Whitefriars Monastery and adjoining land.

All the identified properties are in the City Centre and it is envisaged that they will be accessible to the general public thereby complimenting and improving on the current heritage offer as destinations for tourists in the City to visit.

1.5 The properties identified in paragraph 1.4 are recommended to be included into an overarching Framework Agreement. The properties will be transferred by the Council to the HCT on a case by case basis subject to a business case approved by the Cabinet Member for Jobs and Regeneration.

1.6 It is assumed that the properties will be transferred on a long leasehold basis however in exceptional circumstances it may be appropriate to consider the transfer of the freehold interest. This would be determined at business case stage.

1.7 The business case submitted by the HCT to the Cabinet Member for Jobs and Regeneration for approval must satisfy the criteria set out in paragraph 2.1.14

1.8 The Historic Coventry Trust (HCT) was formed in 2011 previously known as the Charterhouse Coventry Preservation Trust to take ownership of The Charterhouse, which they acquired from City College in 2012. In 2015, the organisation amended their name from Charterhouse Preservation Trust to the Historic Coventry Trust with a remit to protect the wider City Heritage Assets. The Board member of the Trust currently includes:-

- Chairman: Ian Harrabin has over 30 years' experience in major regeneration projects working in partnership with local and central government and the community.
- Secretary: John Ruddick is a Coventry solicitor and is responsible for all legal, financial and compliance matters
- Trustee: Alan Durham is a retired former employee of Coventry & Warwickshire Chamber of Commerce
- Trustee: Stuart Daniel is a practising solicitor, specialising in family law.
- Trustee: Jamie Magraw is a Finance Director
- Trustee: Sonia Kullar is a business woman and trustee of a range of groups representing BAME projects.
- Trustee: Dr Geoff Willcox is Director of Arts and Culture at Coventry University
- Trustee: Mark Webb is Development and Fund Raising Manager for the Princes Regeneration Trust

It has been agreed with the Historic Coventry Trust that the Cabinet Member for Community Development will become a Trustee and Board Member in order to represent the Council and ensure the long term protection of the assets.

1.9 For the HCT to be successful with future funding bids with the Heritage Lottery Fund (HLF) & Historic England (HE), the Councils commitment to transferring these assets to HCT is essential.

1.10 The proposal is for the Framework Agreement to be for a fixed period of five years for which the Trust must work up a business case on an individual basis for each heritage asset.

2. Options considered and recommended proposal

2.1 Option 1 - Proceed with the Framework Agreement to the Historic Coventry Trust

2.1.1 There is a prime opportunity to preserve and bring back into use Coventry's heritage assets for future generations through a partnership with the HCT. Subject to individual business case approval, capital expenditure secured through grant aid and other sources for each property will lead to the renewal and reuse of the building.

2.1.2 The investment into the heritage assets will enhance the visitor offer for the City as a future cultural and tourist destination in addition to supporting the City of Culture bid.

2.1.3 The proposals from HCT for the identified heritage assets can be categorised into three areas:-

- Phase 1(a) Charterhouse Heritage Park
- Phase 1(b) Burges/Hales Street Townscape Heritage Scheme
- Phase 1(c) Unique Visitor Accommodation and Future Projects.

2.1.4 **Phase 1(a) Charterhouse Heritage Park** will seek the lease of the Coach House and Charterhouse Fields (The Charterhouse is already owned by HCT) and the Grade 2 Listed Anglican and Grade 2* Listed Non-Conformist Chapels situated in London Road Cemetery. The proposal is to develop The Charterhouse and surrounding land as a multi-use facility seeking to develop the land and buildings as a visitor and conference centre, wedding venue, café/restaurant and community heritage park. The proposals will seek to open up access to The Charterhouse and seek to provide a connection with London Road Cemetery and reunite the interests in the Charterhouse, most of which is already under the control of HCT.

- 2.1.5 **Phase 1(b) Burges/Hales Street Townscape Heritage Scheme** is an area in need of investment and requires a comprehensive restoration similar to the regeneration of Far Gosford Street. The project includes the restoration of buildings, shopfront improvements, the infilling of small gap sites and the opening up of the River Sherbourne as a new public square. It is proposed to transfer Council income producing assets of properties in Hales St and The Burges, on a long leasehold. The revenue from Hales St and The Burges will initially provide core income for HCT who will take over the management of the properties and will be used to fund the groups operational costs
- 2.1.6 If match funding is required for the restoration of the properties, the income will allow HCT the opportunity to borrow money against these assets to secure the restoration. HCT has stated that it is committed that it will never borrow more than 50% of the value of any individual asset so not to put the Trust at risk.
- 2.1.7 **Phase 1(c) Unique Visitor Accommodation** is considering converting heritage properties into unique bespoke places to stay in the City Centre. The properties that are targeted to be converted into visitor accommodation are the following:-
- Lychgate Cottages at 3-5 Priory Row
 - Whitefriars Gate (previously Toy Museum)
 - Swanswell Gate
 - Cook Street Gate.
- There are no funding bids currently associated with these properties and HCT will seek funding from Historic England and Heritage Lottery Fund to enable the refurbishment of these buildings.
- 2.1.8 It is proposed by the Trust to convert the Lychgate Cottages at 3-5 Priory Row into short term lettings for visitors to the city and the transfer will be subject to funding for conversion works being secured.
- 2.1.9 Whitefriars Gate and adjoining land, the Trust propose to convert the Gatehouse into two visitor cottages and the side annex into office units for possible creative/digital use. The Trust also requires the land adjoining to create a small residential development to cross subsidise the restoration. The long-leasehold will be transferred once funding has been secured.
- 2.1.10 Swanswell & Cook St Gates will be converted to visitor accommodation and it is proposed that they will be transferred on a 250year lease upon completion of fund raising.
- 2.1.11 Drapers- The scheme is to restore the buildings for the education and performance of classical music, possibly with an ancillary restaurant. Designs for the building are currently being undertaken.
- 2.1.12 Whitefriars Monastery – The building is currently being leased by Culture Coventry and being used as store. This is a lost opportunity for such a prominent and important building. Initial proposals for the reuse of the former Whitefriars Monastery include a possible café/restaurant at ground floor level in the former cloisters with the first floor space as future exhibition/event space.

- 2.1.13 The majority of the properties currently do not receive an income apart from the assets at The Burges and Hale Street. They will only be transferred to the HCT on an individual basis subject to strict criteria and imperative that funding has been secured for the proposed works. Only when the criteria has been satisfied and subject to approval from the Deputy Chief Executive (Place) in consultation with the Cabinet Member for Jobs and Regeneration can the transfer occur. It will be a condition of any transfer, that any income derived from the properties is reinvested solely for the charitable aims of the Trust.
- 2.1.14 A business case needs to be submitted for consideration by the Cabinet Member for Jobs and Regeneration and the following criteria will need to be satisfied for the transfer to be approved. The Business Case may be completed on a two stage process: (1) Outline business case to obtain an in principle agreement to allow schemes to be progressed (2) Full Business case considering and satisfying all the 16 set criteria below:-

	Criteria
1	Independent Market Valuation of the Asset
2	Fully designed and costs scheme for restoration
3	Planning approval in place
4	Listed Building Consent (where applicable)
5	Agreed end use
6	Project funding secured
7	Restriction that no more than 50% of the property asset can be borrowed against
8	Agreed programme for implementation
9	Agree public access and use (Asset Lock)
10	Demonstrate Historic Coventry Trust Cash flow
11	Insurance to cover assets
12	Maintenance and Inspection plan
13	Pending restoration- measures to protect form further deterioration, vandalism & theft
14	Any surplus is used solely to further the aims of the charity and/or reinvested in the restoration and ongoing maintenance of the historic assets transferred.
15	Prioritise against the Historic England at risk Register
16	Illustration of how the transfer of the asset contributes to the securing of grant match funding.

(numbering does not reflect any criteria weighting and additional criteria may be added on a case by case basis as required)

- 2.1.15 The governance of the HCT is of paramount importance if the Council is to transfer its assets. It is proposed to appoint the Cabinet Member for Community Development to be a Trustee on the Board.

2.2 Option 2 - Council to undertake works and obtain funding

- 2.2.1 Whilst the Council are the lead applicant in the funding bids for London Road Cemetery and the Burges/Hale St, the Council does not have the resources to undertake the refurbishment and conversion of the identified properties. In the scenario the Council would retain its existing income but would need to attract external grant monies and use corporate capital resources to fund any heritage regeneration projects for these assets. Additionally, the ongoing maintenance and liability for the assets would be retained by the Council.

2.3 **Option 3 - Council Dispose of Individual assets**

- 2.3.1 The Council could dispose of the assets individually on a long-leasehold and where possible receive a capital receipt/premium. However the Council may lose the potential for these assets to be accessible for the general public in the future and would go against the aim of using the heritage assets for the purposes of cultural and tourist destinations.
- 2.3.2 It should be noted that an individual purchaser may not be eligible for grants to restore the properties and will require sufficient resources to bring the properties back into reuse.

2.4 **Option 4 - Do nothing**

- 2.4.1 This is not an option as the properties will continue to deteriorate and the Council will still have the burden and liability for the maintenance of these properties.
- 2.5 Option 1 is the recommended option for the reasons identified.

3. **Results of consultation undertaken**

- 3.1 It is anticipated that the works the Trust seek to undertaken will require Listed Building Consent and the Trust will have to undertake consultation with stakeholders.

4. **Timetable for implementing this decision**

- 4.1 If approved, HCT will submit individual business cases for the transfer of the historic assets over a five year period.

5. **Comments from Director of Finance and Corporate Services**

- 5.1 Financial implications

Some of the assets proposed to be potentially transferred to HCT generate income for the Council. If the properties along with their rental income do transfer to HCT, this is broadly equivalent to circa £1m of capital investment value. As previously stated however, there is an estimated condition backlog in excess of £3m and in return, the Council would be free of all future repair liabilities.

Commercial Property income targets are under significant pressure as a result of wider developments in the City Centre and cannot therefore absorb further potential pressures should these assets transfer. The pressure will need funding either within the ongoing budget setting process or through alternative income generating opportunities identified and secured via the existing asset acquisition plans.

The transfer of the properties will be subject to approval of individual business cases providing the criteria is achieved. In return for the loss of income, the assets will have a defined funding strategy to return the assets into use and the Council will be free of all future repair liabilities. If the Council were to retain the assets, we may not be able to access certain funding streams to assist in the refurbishment of these units.

5.2 Legal implications

Disposal of land

The Council is under a legal obligation to ensure that any consideration it receives will represent “Best Value” in accordance with the Councils requirements to obtain the best consideration reasonably obtainable pursuant to the provisions of Section 123 of the Local Government Act 1972.

It is recognised and expressed in the report that the value of the Councils interest is proposed to be foregone in return for the benefits of securing the return of the assets into use as well as relieving the Council of all future repair liabilities. Under the General Disposal Consent 2003, specific consent is not required for the disposal of any interest in land which the authority considers will help it to secure the promotion or improvement of the economic, social or environmental well-being of its area provided the undervalue does not exceed £2million pounds.

Officers in Legal services will complete the necessary legal documents to reflect the negotiated and agreed terms in respect of each property. Officers will also look to protect the Councils position within the long leases by including restrictive user and alienation provisions as is deemed appropriate.

State Aid

State Aid can arise in the sale or transfer of land (including buildings) especially where the owner of the land (being 'the Council') does not get full market value for it. In this way the purchaser of the land is getting a benefit that could, at least potentially, distort competition. It is not anticipated that state aid will apply in this case as there is a general heritage exemption.

However, on a case by case basis and as full business cases are being determined which trigger the transfer of the leasehold interest, a state aid analysis will need to be undertaken to ensure that any state aid implications which are identified are properly managed and (where necessary) that the adequate exemptions under the State Aid regulations are applied. To this end, Legal Services have been kept involved and will be continue to be involved throughout the proposal.

6. Other implications

Any other specific implications

6.1 How will this contribute to achievement of the Council's Plan?

The delivery of the assets to the Trust will ensure that they will be refurbished and will deliver vibrant, economic and social benefits to the local community. In addition, the cultural and tourism offer will be improved and therefore showcase Coventry's heritage.

6.2 How is risk being managed?

The risks have been identified earlier in the report because if the Council fail to transfer the properties they will continue to deteriorate. It should be noted that the properties will continue to be the responsibility of the Council until a business case has been approved for each property.

6.3 What is the impact on the organisation?

The project proposals include the upgrading and restoration of Council owned land and property which will be positive.

The impact on the organisation will be minimum, apart from the resources from Legal Services to complete the legal documentation.

6.4 Equalities / EIA

The proposal does not require an EIA because the position will remain unchanged in the short term however any longer term proposals may require an EIA as they may impact upon the groups using the local facilities and the local community.

6.5 Implications for (or impact on) the environment

The Project will bring about positive environmental impacts:-

- Restoration of buildings
- Development of brownfield land
- River Sherbourne Improvements
- Reusing reclaimed materials

6.6 Implications for partner organisations?

The impact will be positive for the Heritage Coventry Trust as they will bring these assets back into use and safeguard their future.

Report author(s):

Name and job title: James Grant – Principal Development Surveyor

Directorate: Place

Tel and email contact: 024 7683 3674. James.Grant@coventry.gov.uk

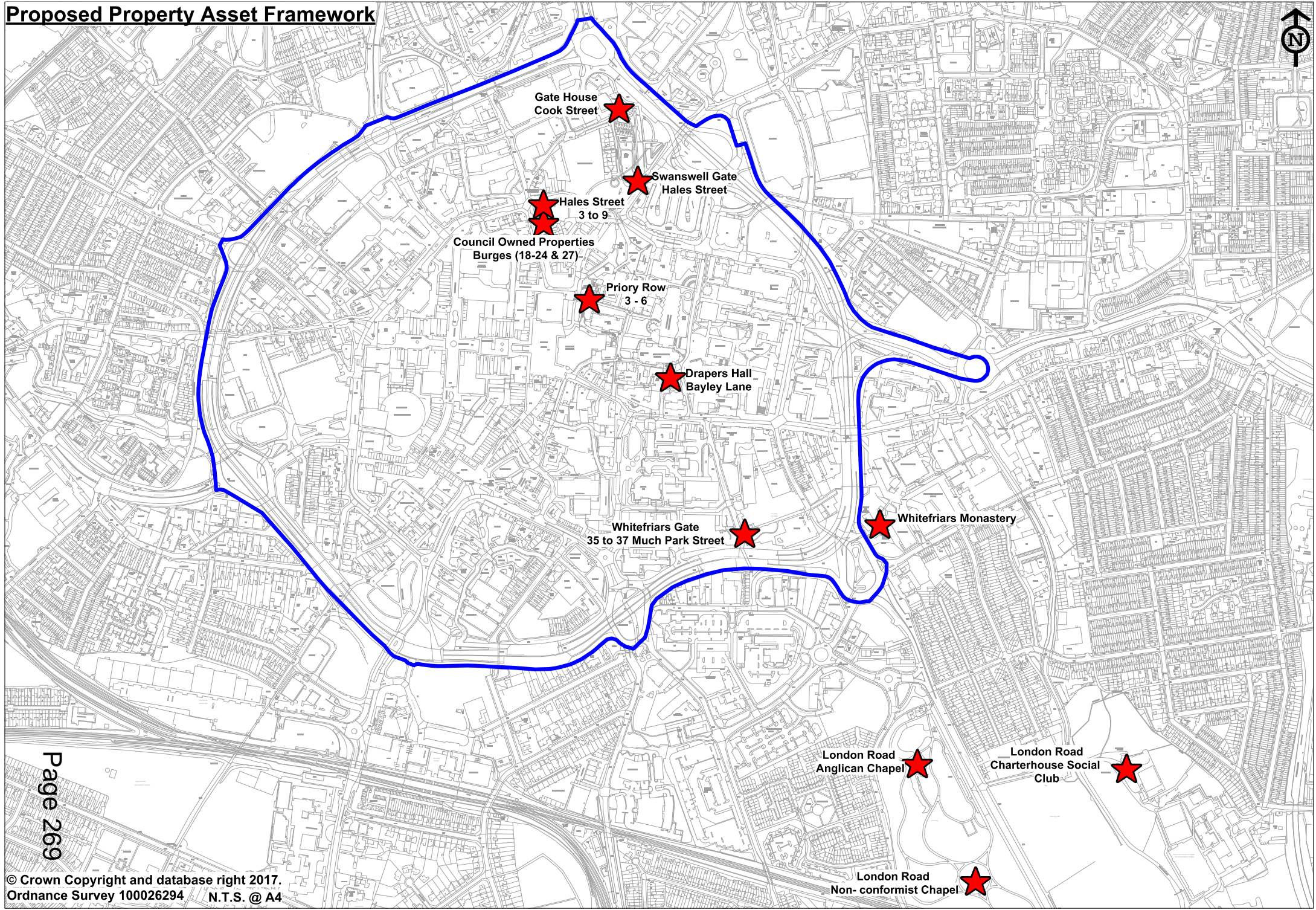
Enquiries should be directed to the above person.

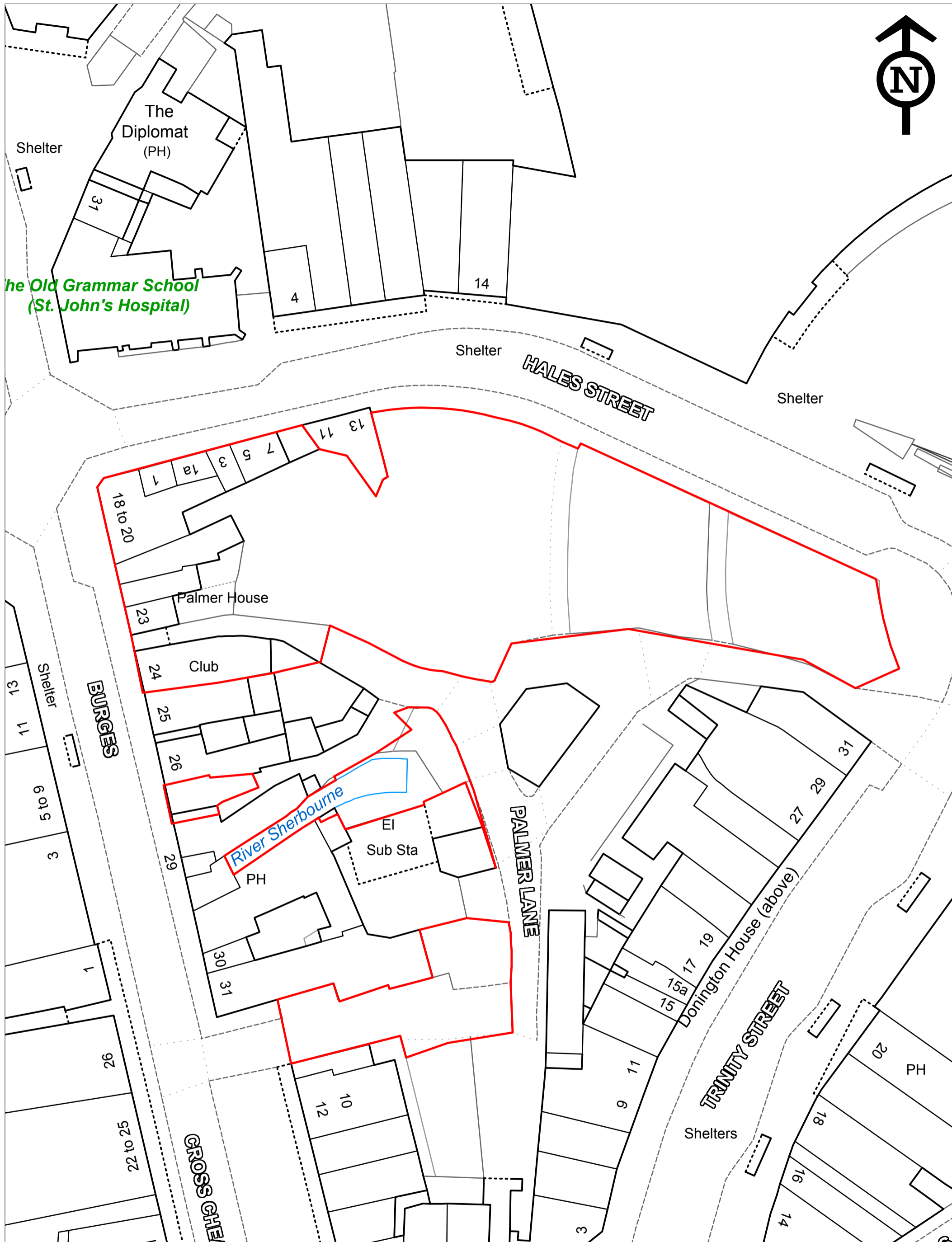
Contributor/approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Nicola Poole	Project Manager	Place	18.10.17	25.10.17
Christopher Patrick	Conservation and Archaeology Officer	Place	18.10.17	25.10.17
Lara Knight	Governance Services Co-ordinator	Place	18.10.17	25.10.17
Richard Moon	Director of Project Management & Property Services	Place	18.10.17	27.10.17

Other members				
Names of approvers for submission: (officers and members)				
Finance: Phil Helm	Finance Manager	Place	18.10.17	27.10.17
Mark Williams	Lead Accountant Business Partner	Place	18.10.17	26.10.17
Legal: Oluremi Aremu	Major Projects Lead Lawyer	Place	18.10.17	27.10.17
Legal: Julie Sprayson	Legal Services	Place	18.10.17	25.10.17
Director: Martin Yardley	Executive Director	Place	01.11.17	01.11.17
Members: Councillor Jim O'Boyle	Cabinet Member for Jobs & Regeneration		02.11.17	02.11.17
Councillor Bigham	Cabinet Member for Community Development		02.11.17	

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Proposed Property Asset Framework



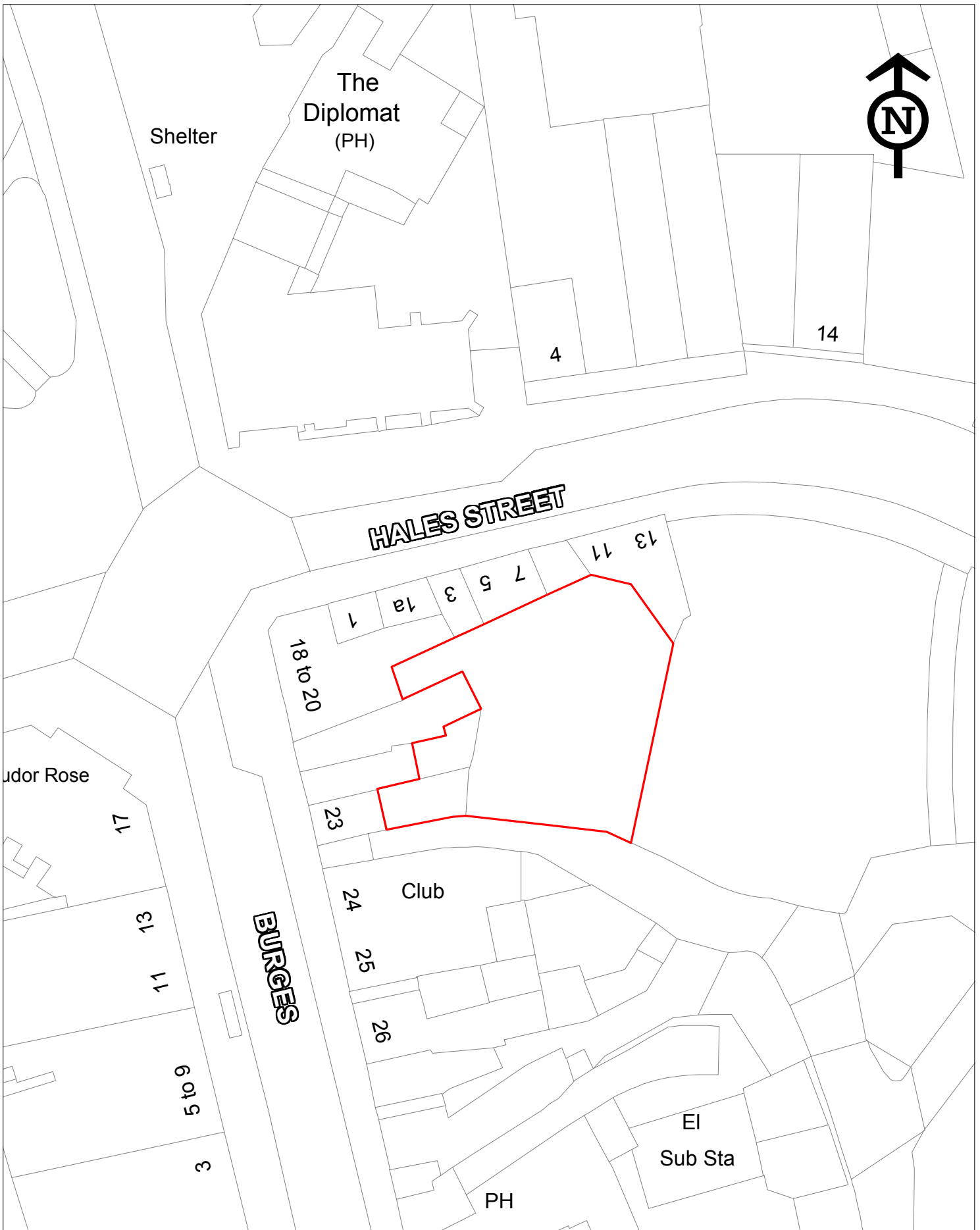


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Title: Land at Palmer Lane, St Michael's, Coventry

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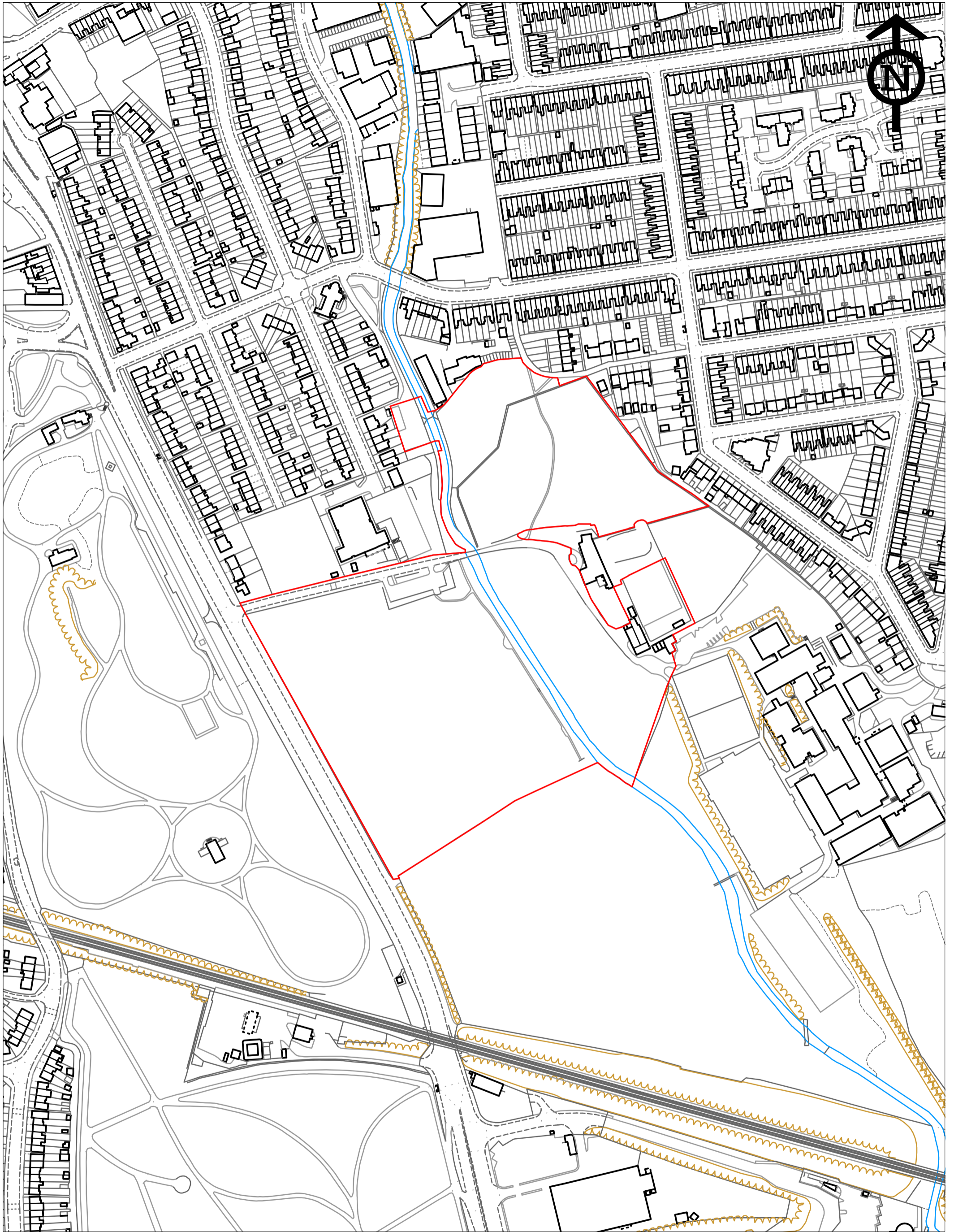


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GAP Site Burges Redevelopment (Area: 0.12 Acres)

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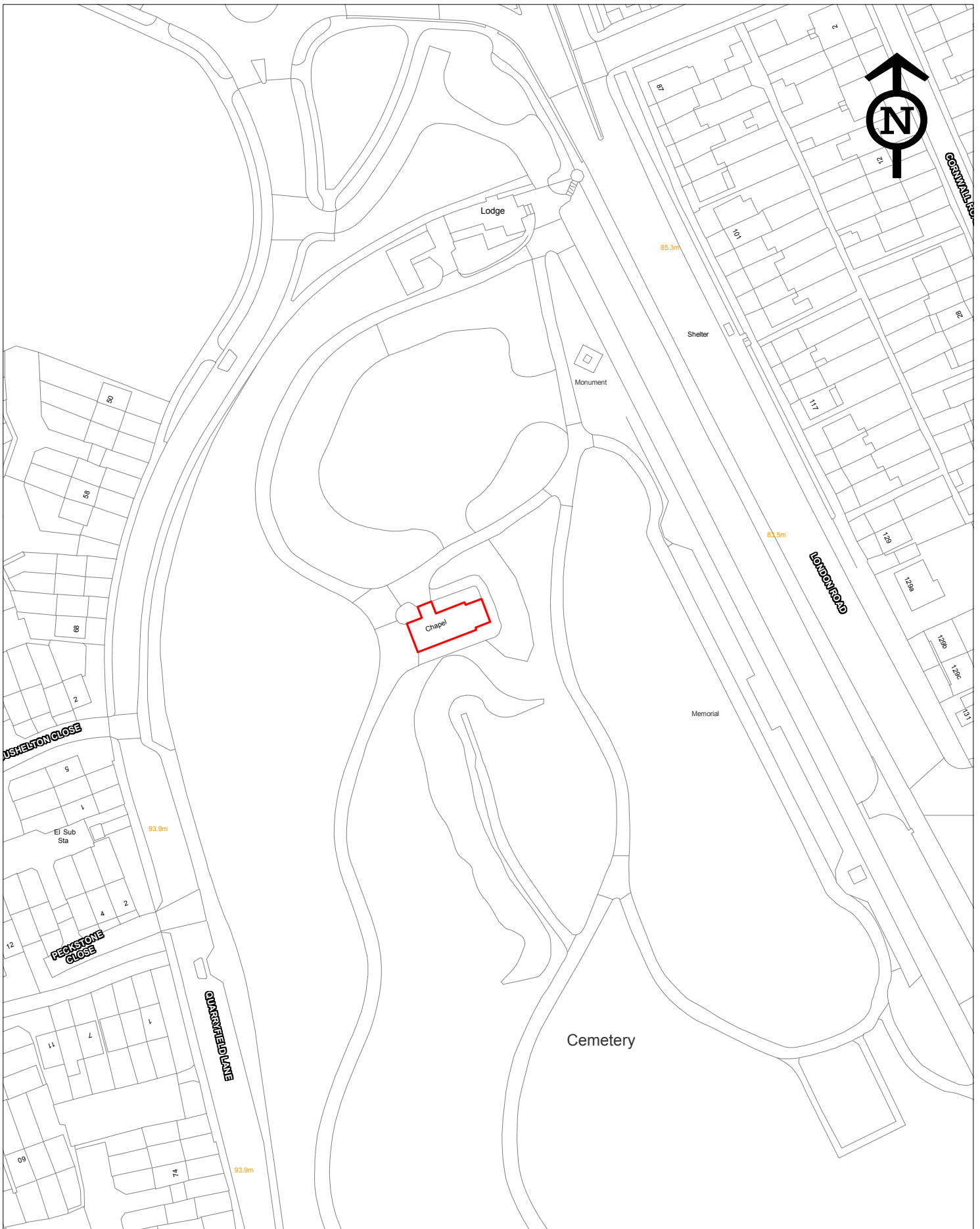
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Title: Land at Charterhouse, St Michael's, Coventry

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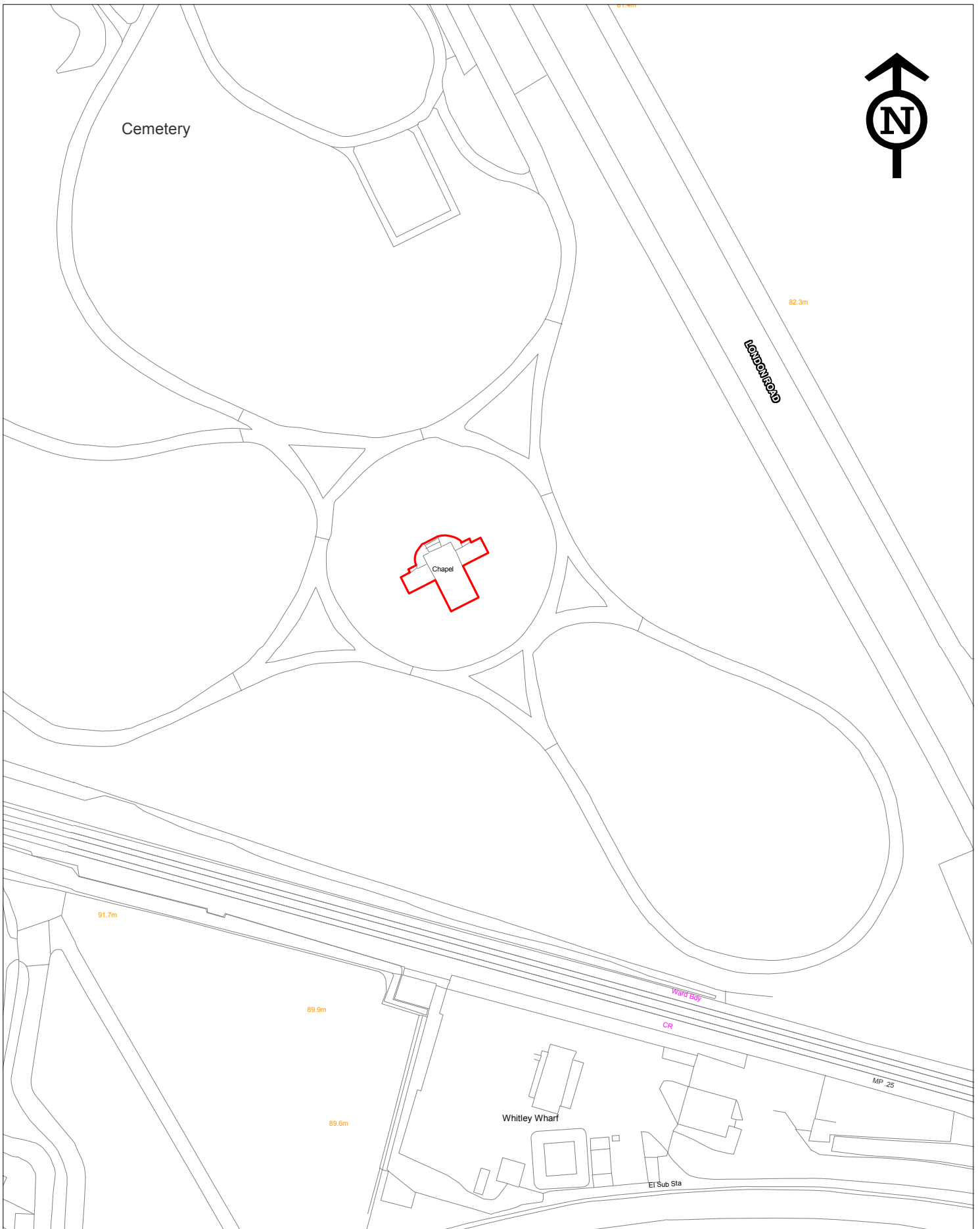


Title: Anglican Chapel, London Road Cemetery

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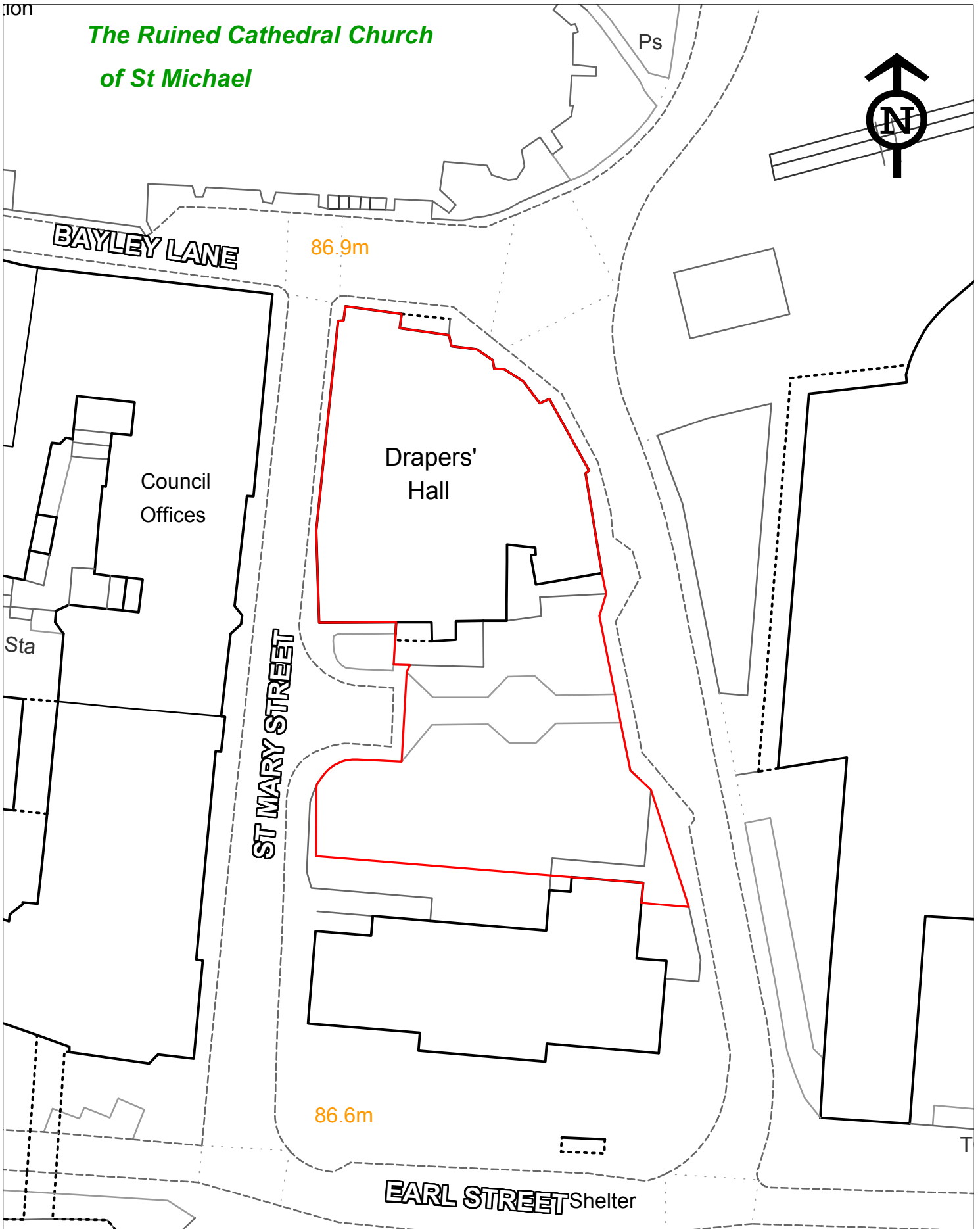
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Title: Non Conformist Chapel, London Road Cemetery

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**The Ruined Cathedral Church
of St Michael**



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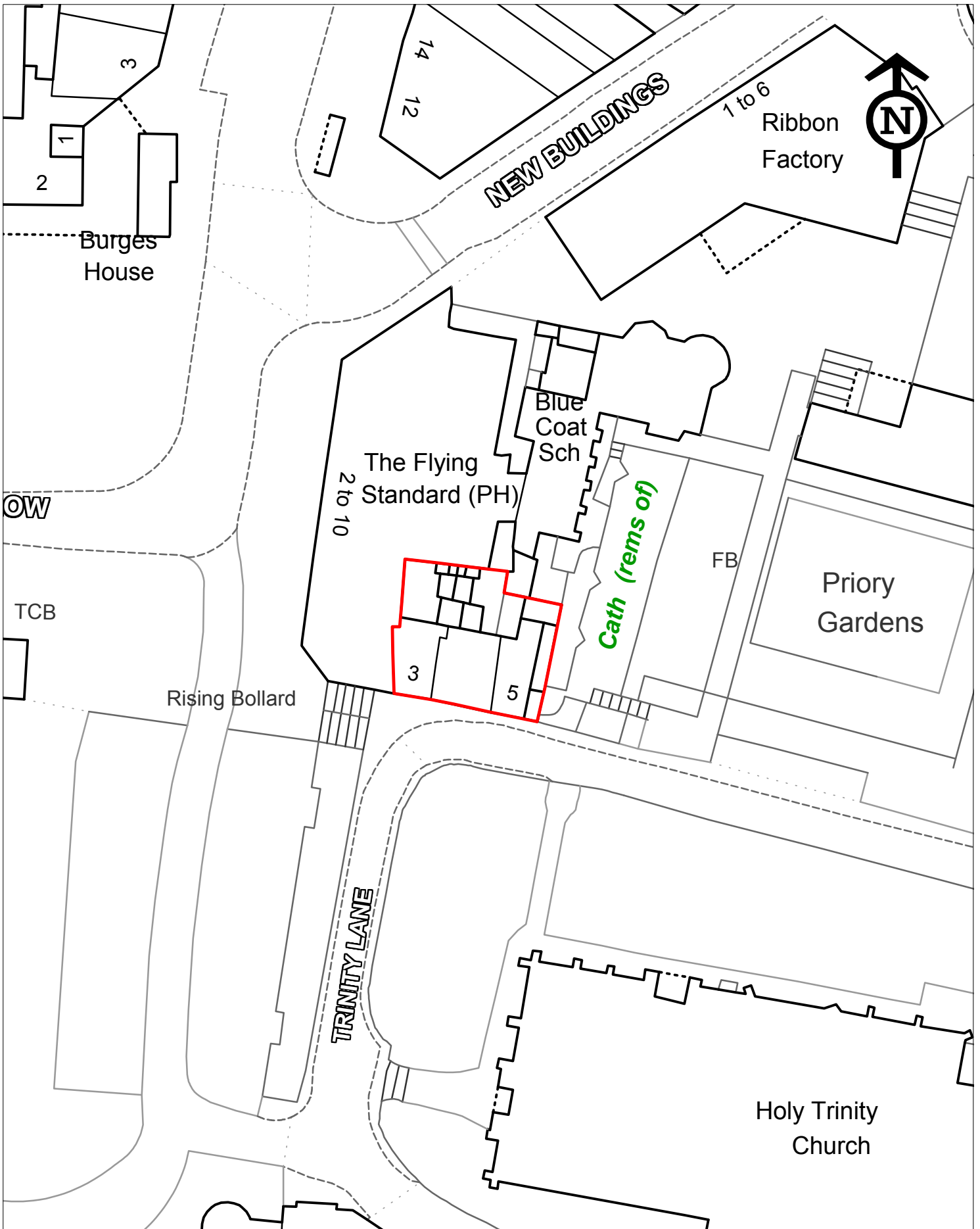


Title: Drapers Hall, St Michael's, Coventry

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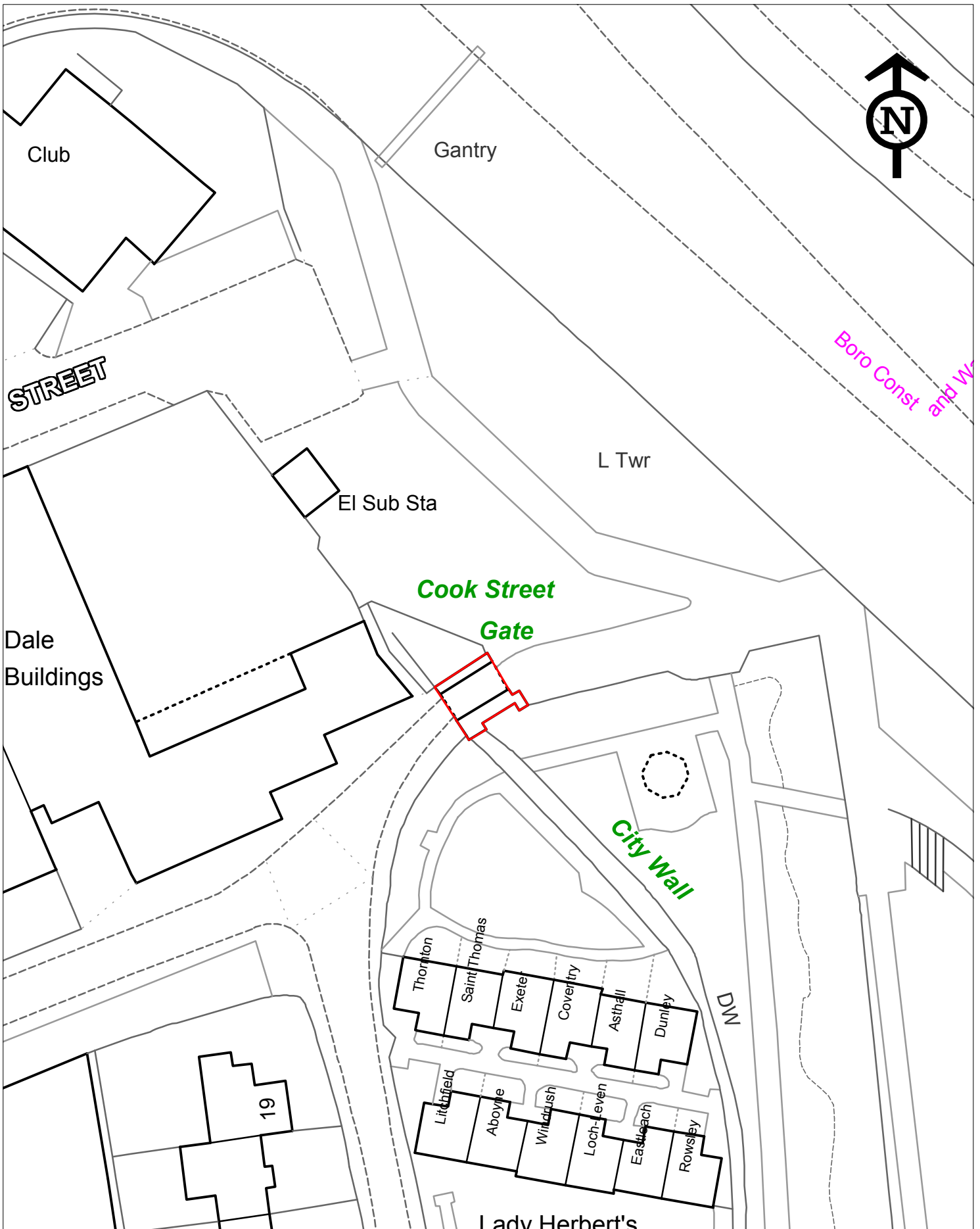
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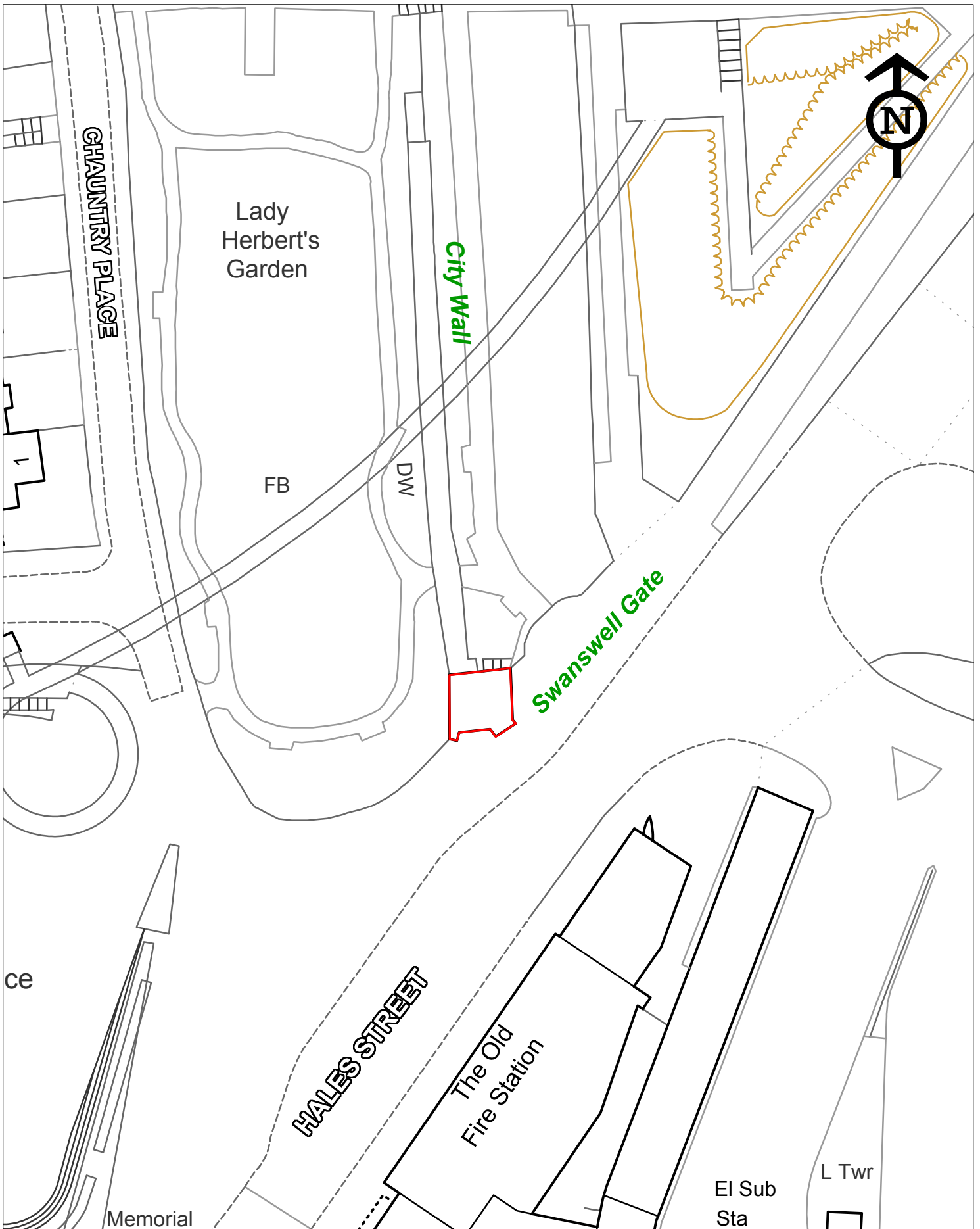


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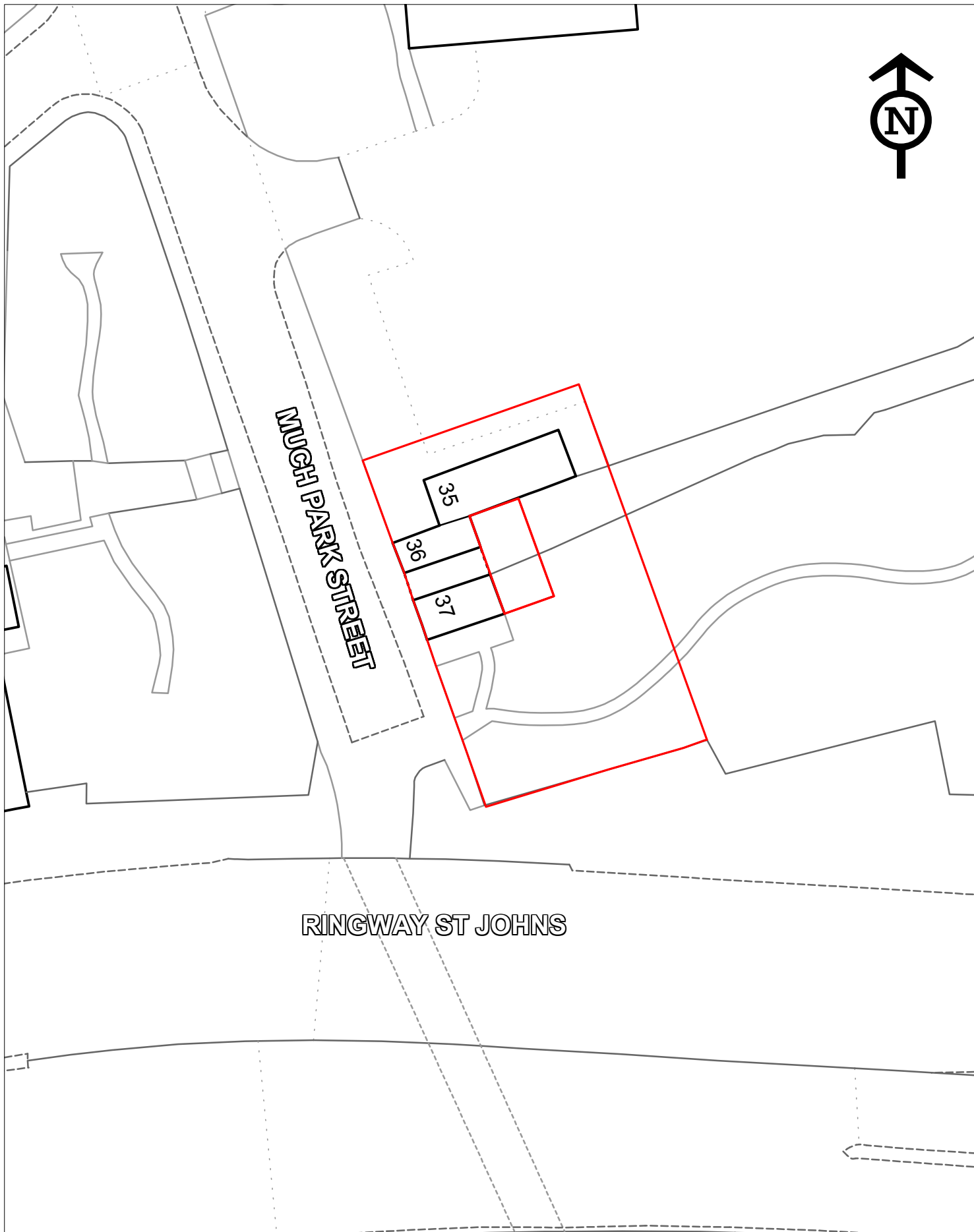
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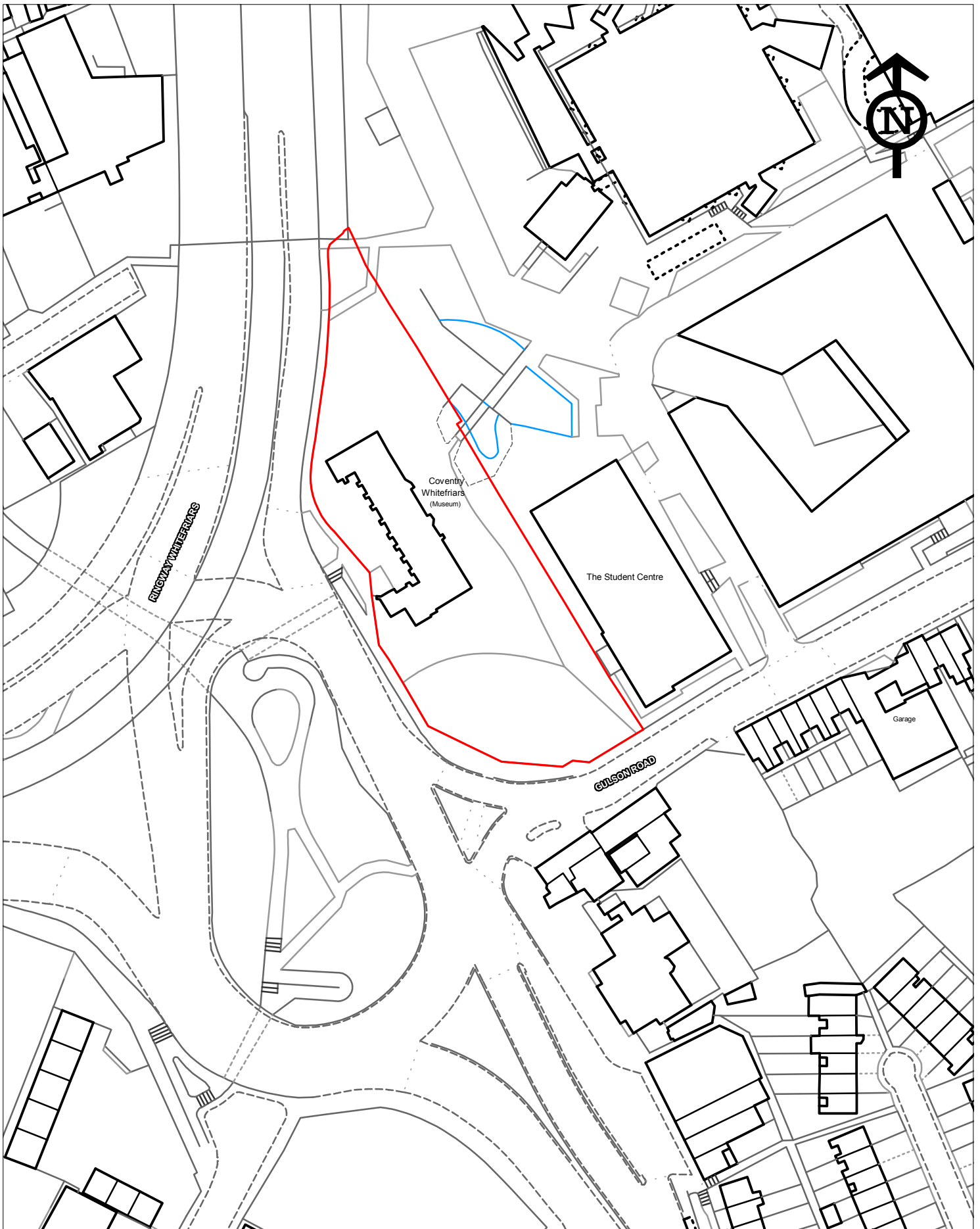


Title: Former Toy Museum, St Michael's, Coventry

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Public report

Cabinet Report

A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains information relating to the financial and business affairs of any particular person (including the authority holding that information) and the amount of expenditure proposed to be incurred by the Council under a particular contract for the supply of goods or services. The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

Cabinet
Council

28th November 2017
5th December 2017

Name of Cabinet Member:

Cabinet Member for Community Development - Councillor Bigham

Director Approving Submission of the report:

Deputy Chief Executive (Place)

Ward(s) affected:

All Wards

Title:

Coventry's Bid for UK City of Culture 2021 – Council Commitments

Is this a key decision?

Yes. The potential financial implications for the City Council of the recommended financial support for the Coventry City of Culture 2021 Bid and acting as guarantor for a successful Bid programme will exceed £1,000,000.

Executive Summary:

On 14 July 2015, Council unanimously approved that the Coventry City of Culture Steering Group lead on the development of a whole-city bid for the title of UK City of Culture 2021, in doing so putting together a realistic and credible bid budget and creating a special delivery vehicle to manage the bid process. As a consequence of these decisions, the Coventry City of Culture Trust ('the Trust') was established to lead the bid. The Trust was subsequently formally incorporated and in February 2016 received charitable status.

In January 2017, the Department for Digital, Culture, Media and Sport (DCMS) formally launched the competition for the title of UK City of Culture 2021. In July 2017, Coventry was selected as one of five destinations shortlisted for the title and in September 2017 the Trust submitted the city's final bid document, since which members of the Independent Advisory Panel and DCMS visited the city. The report proposes the Council's financial commitments for the UK City of Culture programme if the Bid is successful, and recommends a reduced contribution towards bid legacy if the city is not selected as UK City of Culture 2021.

Recommendations:

Cabinet is requested to recommend to the Council:

1. To commit £4.75m of Corporate Reserves for the UK City of Culture 2021 build-up programme, title year and legacy programme (across the period 2018 – 2024), to be drawn-down if the city is awarded the title.
2. To commit £0.75m of Corporate reserves for cultural capacity funding as a legacy from the bidding process and commitment to the Coventry Cultural Strategy 2017-2027, should the city not be awarded the UK City of Culture 2021 title, to provide leverage to secure other partner commitments through the City of Culture Trust.
3. To approve the Council act as guarantor for the UK City of Culture 2021 programme, should Coventry be awarded the title for 2021.
4. To delegate authority to the Deputy Chief Executive (Place) and the Director of Finance and Corporate Services to finalise the terms and condition of the Guarantee

Council is recommended to:

1. Commit £4.75m of Corporate Reserves for the UK City of Culture 2021 build-up programme, title year and legacy programme (across the period 2018 – 2024), to be drawn-down if the city is awarded the title.
2. Commit £0.75m of Corporate reserves for cultural capacity funding as a legacy from the bidding process and commitment to the Coventry Cultural Strategy 2017-2027, should the city not be awarded the UK City of Culture 2021 title, to provide leverage to secure other partner commitments through the City of Culture Trust.
3. Approve the Council acting as guarantor for the UK City of Culture 2021 programme, should Coventry be awarded the title for 2021.
4. Delegate authority to the Deputy Chief Executive (Place) and the Director of Finance and Corporate Services to finalise the terms and condition of the Guarantee

List of Appendices included:

None

Background papers:

None

Other useful documents:

The following papers are posted for reference on the Coventry City Council website:

<http://democraticservices.coventry.gov.uk/mgListCommittees.aspx?bcr=1>:

1. UK City of Culture and European Capital of Culture – Briefing Note of the Executive Director of Place (Communities and Neighbourhoods Scrutiny Board (4), 14 January 2015).
2. Coventry Bid for UK City of Culture 2021 – Cabinet Report (14 July 2015)
3. Appointments of the City Council: Coventry City of Culture Trust (8 September 2015)

4. Coventry's Bid for UK City of Culture 2021: Progress Update (December 2015) - Cabinet Report (9 February 2016)
5. Destination, Events and UK City of Culture - Business, Economy and Enterprise Scrutiny Board (3) (13 April 2016)
6. Coventry's Bid for UK City of Culture 2021: Progress Update (June 2016) – Cabinet Report (5 July 2016)
7. Coventry's Bid for UK City of Culture 2021: Progress Update (December 2016) – Cabinet Report (3 January 2017)
8. Coventry 2021 UK City of Culture Bid - Communities and Neighbourhoods Scrutiny Board (4) (6 September 2017)

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 – 5th December 2017

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Report title: Coventry's Bid for UK City of Culture 2021 – Council Commitments

1. Context (or background)

- 1.1 The UK City of Culture programme was developed by the UK Government to build on the successes that Liverpool enjoyed as the UK's second European Capital of Culture in 2008, through giving more cities the opportunity to access the benefits derived from bidding for a prestigious cultural title and the opportunity to be centre stage nationally. The UK City of Culture programme is focused on creating a national cultural event, spread over the course of a title year, concentrated in a particular city or area. Derry-Londonderry was the first city to be awarded the UK City of Culture title (for 2013) and Hull is the second UK City of Culture in 2017.
- 1.2 In July 2015, Council approved that the Coventry City of Culture Steering Group lead development of a whole-city bid for the title of UK City of Culture 2021, in doing so putting together a realistic and credible bid budget and creating a special delivery vehicle to manage the bid process. Council further agreed that the Coventry City of Culture Steering Group would report back to Cabinet on progress in developing the bid in December 2015, June 2016 and December 2016.
- 1.3 The Coventry City of Culture Trust ('the Trust') was established in 2015 to lead the UK City of Culture bid on behalf of the city. The Trust was subsequently formally incorporated and in February 2016 received charitable status.
- 1.4 In January 2017, the Department for Digital, Culture, Media and Sport (DCMS) launched the competition for the title of UK City of Culture 2021 and published its Guidance for Bidding Cities.
- 1.5 In February 2017, Coventry (along with ten other destinations) formally confirmed its intention to bid for the title. In April 2017, on behalf of the city, the Trust submitted Coventry's initial bid document.
- 1.6 In July 2017, Coventry was one of five destinations shortlisted for the title UK City of Culture 2021 – along with Paisley, Stoke-on-Trent, Sunderland and Swansea. In September 2017, the Trust submitted Coventry's final bid document and in October the city welcomed representatives of the Independent Advisory Panel and DCMS Project Team on a day's visit to the city.
- 1.7 In December 2017, representatives of Coventry's Bid Team will have a final chance to present and answer questions on the city's bid at a panel interview in Hull. The final decision is also expected to be announced in December, once the panel have considered the representations of all five shortlisted destinations.

2. Options considered and recommended proposal

- 2.1 Option 1 – Do Not Make Financial Commitments Concerning the Bid Programme Prior to Receiving a Decision on Award of the Title (**Not Recommended**)
- 2.2 Coventry's final bid for UK City of Culture 2021 sets out a significant build-up programme of events, an ambitious range of artistic residencies, a varied and engaging programme and a clear commitment to generating a transformative legacy. As a Principal Partner for the Bid, Coventry City Council has already committed up to £250,000 towards the bidding process and through previous budget setting for 2017/18 has made provision for a further £250,000 to fund expenditure to develop the city's plans from January 2018.

- 2.3 The award of City of Culture 2021 to Coventry is projected to offer around £350m of economic benefit to the city and to have a catalytic impact on regeneration proposals (as referenced in the Private Report). As a Principal Partner, the Council would be expected to invest in Coventry's City of Culture programme, and to ensure good governance around City of Culture delivery.
- 2.4 The Council could defer making decisions on its financial commitments until after the judging process has concluded, thereby only addressing these considerations if the city were awarded the title. This approach is not recommended, as it would affect the scoring of Coventry's bid and leave uncertainty over what level of financial commitment the Council is prepared to make to support the programme, and whether a suitably secure guarantor for the programme has been identified for the city. Other competitors with confirmed local authority funds would be more likely to be selected ahead of Coventry, despite its other strengths and success of fundraising. The winning city will need to act immediately to recruit staff and draw-down other national partnership funding from the likes of Arts Council England and Heritage Lottery Fund. Match funding must be in place to do so.
- 2.5 Option 2 – Approve a Financial Commitment to the Bid Programme, and to act as Guarantor for the Programme, Prior to Receiving a Decision on Award of the Title (**Recommended**)
- 2.6 The award of UK City of Culture represents more than a title. As the bidding process has already demonstrated, it is an opportunity to create new partnerships, to bring communities together and to celebrate the rich heritage and unique qualities of a city. It is also an opportunity, through culture, to raise the profile of a city, to attract new investors and to enable significant regeneration in and of the place. The city effectively has the benefit of the title for seven years from announcement, through delivery year to three years legacy.
- 2.7 Work on Coventry's UK City of Culture Bid has been underway for nearly three years. The Council has already demonstrated significant commitment to the process of bidding, but it is considered advantageous to provide certainty of that ongoing commitment, and the security of all the title stands for, should UK City of Culture 2021 be awarded to Coventry.
- 2.8 Coventry has developed a partnership Cultural Strategy 2017-2027 which will endure and remain vibrant, whether or not the city is successful in its bid for UK City of Culture. The Council has, over the past three years, directly invested in the city's independent cultural sector and through Great Place and Cultural Destinations awards, to work that has commenced to reposition the city as a destination for tourism and events will progress. However, by demonstrating a clear financial commitment to (i) the City of Culture build-up programme (ii) the comprehensive programme for 2021, and (iii) the legacy period to 2024, the Council can signal its commitment for the next seven years, until a new city would deliver UK City of Culture 2025. Through phasing such investment, the Council secures sustainability in such arrangements and provides for a stable period of planning and delivery.
- 2.9 The recommendation for the Council to act as guarantor for the City of Culture 2021 programme hints at the scale of the city's aspirations and plans for the title, which is referenced in more detail in the Private paper. Through confirming its commitment to act as guarantor at this early stage, the governance processes for delivery and legacy can be implemented with some certainty.
- 2.10 Finally, should Coventry's bid for City of Culture not be successful, the commitment of the city to its Cultural Strategy remains. Coventry would not realise the significant benefits outlined in the bid documentation, nor would it achieve the profile and recognition so many consider it should. However, by committing to a £1m investment in legacy, the Council would continue to demonstrate its commitment to the transformative power of culture and the strength of new partnerships formed through the bidding process. The scale of emerging

work could not compete with that which would be realised by a successful bid, but the Council's commitment would be likely to lever additional investment and the foundations for cultural growth, investment and impact in the city would be strengthened.

3. Results of consultation undertaken

- 3.1 Through Coventry's City of Culture bidding process, over 13,000 people have been directly consulted concerning the Bid plans, which has shaped and influenced programme, messaging and marketing. Over 109,000 people have already engaged in the city's advance programme and Coventry's Bid film has had over 150,000 online viewings to date as well as screening and workshops in schools across the city. Social media reach has been extensive with over 18,000 people backing the bid online.
- 3.2 During their October visit to Coventry, representatives of the Independent Advisory Panel and DCMS Project Team had lunch with over 200 people from across the city's communities, with a diversity of representation from the cultural sector, communities, the public sector and private sector businesses. Such conversations have, over the past two and a half years, shaped the bid and steered its priorities.
- 3.3 The proposed programme reflects the voice of communities. For example, if selected as the UK City of Culture 2021, Coventry will plan to run the first Streets of Cultures competition, celebrating 21 Coventry neighbourhoods. Producers will support and empower local communities to curate festivals and commissions that showcase their culture: a street band, a public art commission, a storytelling festival – individual streets will be reinvented as new cultural spaces to be shared with the city.

4. Timetable for implementing this decision

- 4.1 The award of the title of UK City of Culture 2021 will be made in December 2017. Whether successful or unsuccessful, plans would be implemented with immediate effect to respond to the decision.
- 4.2 By already committing through the 2017/18 budget setting process to £250,000 of funding for development from January 2018, the city can move with immediate effect to implement plans for delivery and/or bid legacy. If successful, Coventry would then have three years to deliver its build-up programme and to plan to deliver on its bid commitments as the UK City of Culture 2021.
- 4.3 The financial commitments recommended in this report would not be realised until the new financial year from April 2018. As outlined in Section 5, the Council's financial commitments would be phased across the period from 2018-2024.

5. Comments from Director of Finance and Corporate Services

5.1 Financial implications

In 2015, the City Council committed up to £250,000 to support the bidding process for UK City of Culture 2021.

The award of the title of UK City of Culture 2021 will be made in December 2017. Whether the bid is successful or unsuccessful, plans would be implemented with immediate effect to respond to the decision. By already committing through the 2017/18 budget setting process to a further £250,000 of funding for development from January 2018, the city can move with immediate effect to implement plans for delivery (if successful) and/or bid legacy (if not successful).

If the city's bid were successful, Recommendation 1 within this report would commit the City Council to a further £4.75m contribution from Corporate Reserves, to be drawn down broadly as follows:

Year	Amount	Finance
2018/19	£500,000	Staffing core costs and development of programme
2019/20	£750,000	Staffing, core costs and advanced tourism marketing
2020/21	£1,000,000	Staffing, marketing and programme
2021/22	£1,500,000	Staffing, marketing, programme and legacy (+Q1 of 2022)
2022/23/24	£1,000,000	Legacy programme covers 2022, 2023 and 2024

The Coventry City of Culture Trust would be responsible for programming; marketing and communications; fundraising and financial management; and community engagement. Final programme costs and commitments will be confirmed in the build-up to 2021, but the current projected programme costs are outlined in the Private Report.

Financial responsibility for the Trust's activities lie with the Chair and Trustees, with an independent Audit Committee already having been appointed to provide scrutiny and oversight. However, it is the Council's expectation that it would be asked to enter into a Memorandum of Understanding with DCMS on behalf of the city for delivery of UK City of Culture 2021. Therefore, whilst the Trust would lead on the above matters, if approved, Recommendation 3 would commit the Council to act as guarantor for delivery of the programme in line with the anticipated MoU, and other contractual arrangements made by the Trust with sponsors and other funding bodies.

If the city's bid for the title of UK City of Culture 2021 were not successful, Recommendation 2 within this report would commit the City Council to £0.75m of Corporate reserves for cultural capacity funding as a legacy from the bidding process and commitment to the Coventry Cultural Strategy 2017-2027, to provide leverage to secure other partner commitments through the City of Culture Trust. This would be drawn-down as follows:

Year	Amount	Finance
2018/19	£250,000	Capacity building in the cultural sector
2019/20	£250,000	Capacity building in the cultural sector
2020/21	£250,000	Capacity building in the cultural sector

5.2 Legal implications

The Council has discretionary powers, in particular under section 145 Local Government Act 1972, to promote the arts and the crafts that support those arts as well as providing entertainments, libraries museums and art galleries. The promotion of a UK City of Culture bid and programme sits within these powers. It also has powers to promote economic development in its area and the creation of jobs and business opportunities and the- making a bid and delivering a successful bid programme fits with this power.

The Council is not being asked to secure funding to the project, but act as a guarantor on the financial obligations of the Trust in delivering the City of Culture. The guarantee by the Council would be an appropriate use of the General Power of Competence under the Localism Act 2011.

The underwriting by the Council of Coventry City of Culture Trust's financial obligations to deliver the City of Culture may constitute State Aid (i.e. any benefit the Council grants to another organisation will be State Aid if the benefit confers an advantage on that

organisation, the organisation operates in a market, and it effects trade between member states).

It should however be noted that the State Aid rules apply only where aid is provided to an 'undertaking'. An 'undertaking' is broadly described as an entity engaged in an economic activity, i.e. offering goods and services on a market. The activities of the Coventry City of Culture Trust tasked with delivering the City of Culture (if successful) will not fall within the description of an undertaking and as this State Aid test is not met, the guarantee by the Council will not be deemed to breach the State Aid Regulations.

6. Other implications

6.1 How will this contribute to achievement of the Council Plan?

As previously reported to Cabinet and Council, a successful City of Culture bid from Coventry would make wide-ranging contributions to delivery of the Council's key objectives and corporate priorities. The following are only a selection of potential contributions the bid could make:

- ***A prosperous Coventry*** – The City of Culture title can bring significant economic benefit to a city and its surrounding area. Hull has attracted major national investment towards its planned programme budget for 2017, with Arts Council England, Heritage Lottery Fund, Big Lottery (via Spirit of 2012), British Council and the University already committed to the programme. The initial estimated economic benefit from tourism for Hull from the programme was £60 million, anticipated to be generated through employment and attendance during the City of Culture year itself. In reality this is now estimated to be much higher (Hull exceeded visitor targets within three months and has seen over 90% of its population engage with the year. Over £200m of additional benefit has been secured through the extra investment in capital and regeneration programmes. Derry/Londonderry reported more than 1 million visitors to the city in 2013 and an increase of 20% in bed and breakfast and hotel bookings. The city also attracted 30 business conferences to the city and 40 new business starts were supported by the Business Opportunities Fund.
- ***Healthier, independent lives*** – Cultural services play a vital role in addressing social challenges, reducing isolation and improving outcomes for individuals and communities (Local Government Association). A review of medical literature undertaken in 2004 cited nearly 400 papers showing the beneficial impact of the arts on a wide range of health outcomes (Staricoff, 2004) – demonstrating involvement in or exposure to the arts positively impacting on diagnosed conditions as diverse as dementia, anxiety, depression and rheumatoid arthritis, whilst also contributing more generally to physical and mental wellbeing; reducing requirements for pain relief; shortening periods of recovery; and reducing levels of required medication. A well-conceived bid should therefore have a significant contribution to generating a range of positive health outcomes.
- ***Making Coventry an attractive and enjoyable place to be*** – Derry/Londonderry reported positive impacts on civic confidence and pride in its creative and cultural offer. The city further saw physical assets created or refurbished in the city. In the build-up to its City of Culture year in 2017, Hull experienced the acceleration of significant regeneration schemes and projects. A public survey in the Hull Daily Mail identified that City of Culture was the single thing most people thought was putting Hull 'on the map' In depth surveys by Lottery funder Spirit of 2012 have shown a positive impact on well-being, happiness and local pride in Hull's population. Hull's final evaluation will be available in March 2018.

- ***Ensuring that children and young people achieve and make a positive contribution*** –The Warwick Commission on the Future of Cultural Value (2015) noted that “the extraordinary cultural and creative talents that we share contribute to the well-being of our society, our economic success, our national identity and to the UK’s global influence.” The Commission noted that not enough was being done to realise the creative potential of individuals, despite the workforce in this sector growing over four-times faster than the UK’s workforce as a whole. Were Coventry to be awarded the City of Culture title, the programme (and three year lead-in time) could generate a step-change in opportunities for young people and new graduates in the city across culture and the creative industries.
- ***Encouraging a creative, active and vibrant city*** – The process of developing a City of Culture Bid has stimulated a new cultural narrative in Coventry and has supported the creation of a new partnership Cultural Strategy 2017-2027. Over 13,000 people have responded with enthusiasm to the opportunities the process has presented, and over 53,000 people have already engaged with the city’s build-up programme to date. A successful bid from Coventry will open the city up to new artistic collaborations and investment. The opportunity to generate a step-change around cultural tourism is apparent from baseline data, along with a unique opportunity to stimulate a more diverse and vibrant cultural offering within the night-time economy of the city.
- ***Developing a more equal city with cohesive communities and neighbourhoods*** – A City of Culture bid can bring communities together and generate a greater sense of civic pride in the host city. Liverpool reported that over two thirds of the city’s residents participated in their Capital of Culture programme of events and 85% of residents said the city was a better place to live as a consequence of hosting the year. Hull is already reporting that 90% of residents have engaged with their City of Culture Programme. The Warwick Commission (2015) further calls for a strategic shift in addressing unrepresentative levels of diversity and participation in the arts and culture. Coventry’s City of Culture programme could create a powerful platform for such a step change at a local level, where evidence suggests participation in the arts remains uneven across the city.

6.2 How is risk being managed?

The Coventry City of Culture Trust has led the Coventry bid, with direct input from partners and Elected Members on the Steering Group and from the lead Cabinet Member and officers on the Executive Group.

The Council’s financial contribution to the bid costs have been drawn down from reserves in stages and transferred to the Trust, based on programme development and the overall budget profile of the bid. This would continue in line with the schedule outlined in Section 5 of the report.

A Bid Adviser has been contracted to support development of the bid and a Trust Manager and team have been appointed to the Trust to manage the detailed monitoring and coordination of the project plan. Coventry’s final bid document outlines the governance and employment structures that a successful bid would transition into under delivery, with a 100 day mobilisation plan and longer term timetable for delivery outlined in some detail.

In acting as guarantor for the delivery programme, the Council would increase its representation on the Trust Board to include the Leader and Chief Executive. Regular briefings would be established to review city readiness, delivery plans and budget progress. Additionally, cabinet will receive a formal report every 6 months updating on the Trust’s progress against programme, including any variations in funding and spend levels.

6.3 What is the impact on the organisation?

The Council is not the lead agency for the bid, but is a Principal Partner and plays an important leadership role. The Council commits Elected Member and officer support to the Steering Group and Executive Group.

The Council is also providing some communications support to the bid process, with additional dedicated support further being contracted from Advent PR.

If Coventry's bid is successful the Council would take lead responsibility for city readiness; infrastructure; tourism and cultural strategy; and providing advice on events safety and infrastructure, including transport and liaison with statutory services. If the recommendations of the report are approved, the Council would also act as guarantor for the delivery programme in the event that the Coventry City of Culture Trust failed in the delivery programme obligations set out in the bid submitted to the DCMS or any Memorandum of Understanding entered into with the DCMS concerning UK City of Culture 2021 delivery.

6.4 Equalities / EIA

The City of Culture Guidance for Bidding Cities requires cities to demonstrate a high quality cultural programme that reaches a wide variety of audiences and that uses culture and creativity to lead to lasting social regeneration through building engagement, widening participation, supporting cultural diversity and cohesion, contributing to the localism agenda and reaching out to sectors of the community who are disenfranchised and isolated.

The DCMS has further explicitly required that bids engage a wide range of audiences and participants, especially children and young people and under-represented groups and communities.

No potential adverse impact from bidding has been identified for any specific group. However, capacity assessment work for the bid indicated that a successful bid from Coventry could significantly and positively deliver equalities outcomes for a range of protected groups including young people; vulnerable people (economically disadvantaged); disabled people; people of black, Asian and minority ethnicity; women and older people. Open events and workshops in Coventry have therefore purposely focused on engagement with wide and diverse audiences, and an outcomes framework has been developed (underpinned by baseline data).

The Coventry bid has a central focus on tackling inequalities and in reaching diverse communities in the city.

6.5 Implications for (or impact on) the environment

None.

6.6 Implications for partner organisations?

If Coventry's bid is successful, the City of Culture Trust will transition to a new delivery structure, which is outlined in the final stage bid. However, it is not the only organisation that will be significantly impacted. The bid process has already embraced and engaged the professional cultural sector, local artists and amateur groups. A number of these partners would be engaged in developing and implementing the proposed programme. Furthermore, the two universities and over 100 local businesses and partners have pledged funding for both the bidding phase and also the delivery phase of a successful programme. This investment, and these partnerships (including those between the principal partners), will be

critical to supporting delivery. Ultimately, a successful bid would be expected to have positive economic impact for all of the above sectors and partners.

Report author(s):

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Place

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Councillor Linda Bigham	Cabinet Member for Community Development		02.11.17	06.11.17

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Public report Cabinet Report

Cabinet
Council

28 November 2017
05 December 2017

Name of Cabinet Member:

Cabinet Member for Jobs and Regeneration – Councillor O’Boyle
Cabinet Member for Strategic Finance and Resources – Councillor J Mutton

Director Approving Submission of the report:

Deputy Chief Executive (Place)

Ward(s) affected:

All wards

Title:

City Centre South – Early Acquisition of Long Leasehold Property Interests

Is this a key decision?

Yes, the proposal in this report will incur expenditure above the £1m threshold and it will have implications for all wards in the city.

Executive Summary:

The purpose of this report is to seek approval for the Council’s early acquisition of a third party’s long leasehold property interests in the City Centre South (CCS) red line boundary area and subject to this acquisition being successful, the demolition of Coventry Point.

The long leasehold property interests in the CCS red line boundary area comprises of 21-25 Hertford Street, 26-48 Hertford Street, 13-21 Shelton Square and Coventry Point, extending to approximately 88,500 sq ft of office and retail space. The property interests constitute the largest proportion of the third party property interests in the CCS red line boundary area.

An opportunity has arisen to purchase these long leasehold property interests with completion before the end of the calendar year i.e. 31 December 2017.

The early acquisition of these long leasehold property interests provides a number of benefits, which are as follows:-

- a) Purchasing these long leasehold property interests would bring the largest third party interest in the CCS red line boundary area under the Council’s control.
- b) Increasing the Council’s control of the property interests in the CCS red line boundary area reduces the risk associated with scheme delivery.

- c) Reducing the risk associated with scheme delivery will also improve the project programme as the timescale for completing land assembly is likely to be reduced.
- d) This decision will help to provide confidence in scheme deliverability for SPG, the developer, the West Midlands Combined Authority ("WMCA") and a development funder to invest in the scheme.
- e) The early purchase of these long leasehold property assets would enable the early demolition of Coventry Point, thereby removing a significant eyesore and impediment to connectivity in the city centre.
- f) The interests are currently available, which might not be the case if they were purchased by another third party.

Recommendations:

Cabinet is requested to recommend that Council:

1. Approve the terms of the acquisition of the long leasehold property interests at 21-25 Hertford Street, 26-48 Hertford Street, 13-21 Shelton Square and Coventry Point subject to the current tenancy.
2. Delegate authority to the Deputy Chief Executive (Place) in conjunction with the Legal Services Manager to undertake the necessary due diligence and to complete the necessary legal documentation.
3. Delegate authority to the Deputy Chief Executive (Place) in consultation with the Cabinet Member for Jobs and Regeneration, for any subsequent variation in terms.
4. Delegate authority to Deputy Chief Executive (Place) and S151 Officer in consultation with the Leader and the Legal Services Manager to make any additional early land acquisitions as is deemed necessary where such acquisition represents value for money.
5. Delegate authority to Deputy Chief Executive (Place) and S151 Officer in consultation with the Cabinet Member for Jobs and Regeneration and the Cabinet Member for Strategic Finance and Resources to draw down funding from the WMCA to undertake the demolition of Coventry Point.

Council is recommended to:

1. Approve the terms of the acquisition of these long leasehold property interests at 21-25 Hertford Street, 26-48 Hertford Street, 13-21 Shelton Square and Coventry Point subject to the current tenancy.
2. Delegate authority to the Deputy Chief Executive (Place) in conjunction with the Legal Services Manager to undertake the necessary due diligence and to complete the necessary legal documentation.
3. Delegate authority to the Deputy Chief Executive (Place) in consultation with the Cabinet Member for Jobs and Regeneration, for any subsequent variation in terms.
4. Delegate authority to Deputy Chief Executive (Place) and S151 Officer in consultation with the Leader and the Legal Services Manager to make any additional early land acquisitions as is deemed necessary where such acquisition represents value for money

5. Delegate authority to Deputy Chief Executive (Place) and S151 Officer in consultation with the Cabinet Member for Jobs and Regeneration and the Cabinet Member for Strategic Finance and Resources to draw down funding from the WMCA to undertake the demolition of Coventry Point.

List of Appendices included:

Appendix 1 – Plan detailing the City Centre South red line boundary area.

Appendix 2 – Plan detailing these long leasehold property interests in the City Centre South red line boundary area.

Background papers:

None.

Other useful documents

Report to Cabinet and Council 24 January 2017 – City Centre South Development.
<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=130&MId=11141&Ver=4>

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 – 05 December 2017.

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Report title: City Centre South – Early Acquisition of Long Leasehold Property Interests

1. Context (or background)

- 1.1 The City Centre South (CCS) scheme is a mixed use regeneration scheme in Coventry city centre. The site is located in a pedestrianised shopping area, which was built after World War II. The area and buildings are not fit for purpose for modern retailing requirements and provide an extremely poor environment. The general trend is one of decline and for this reason, the area has been identified for regeneration for a considerable number of years. A plan showing the CCS red line boundary area is attached at Appendix 1.
- 1.2 Following a compliant OJEU competitive dialogue procurement exercise, Cabinet took a decision on 24 January 2017 to appoint Shearer Property Group (SPG) as the developer for the CCS scheme.
- 1.3 SPG's scheme proposal would provide a mixed use regeneration scheme, anchored by a new department store with a leisure offer including a boutique cinema, bowling and restaurants as well as a hotel. There is also a large element of residential, PRS and private market sales units.
- 1.4 The Council has secured a £98.8m grant from the West Midlands Combined Authority ("WMCA") towards the cost of the CCS scheme.
- 1.5 The Council already owns the majority of the land and property interests in the CCS red line boundary area, however there are a number of property interests that are held by third parties. Some of these long leasehold property interests comprise of the assets of 21-25 Hertford Street, 26-48 Hertford Street, 13-21 Shelton Square and Coventry Point. The accommodation extends to 88,500 sq ft of office and retail space. A plan showing these long leasehold property interests in the CCS red line boundary area is attached at Appendix 2.
- 1.6 The opportunity to acquire these long leasehold property interests within the CCS red line boundary area has arisen. The purchase needs to be completed by the end of the calendar year i.e. 31 December 2017.

2. Options considered and recommended proposal

2.1 Option 1 - Wait and Purchase Later

- 2.1.1 This approach involves temporarily deferring a decision to purchase these long leasehold property interests in the hope that there will be an opportunity to purchase the interests at some point in the future.
- 2.1.2 This option is based on a number of assumptions as follows:-
 - a) The opportunity to purchase the long leasehold property interests will remain on the table. This is an unknown and will probably depend on the perceived level of purchaser interest in the market, which is something that is outside of the Council's control.

- b) The third party owner does not sell their long leasehold property interests to another third party. This assumption is dependent upon the level of purchaser interest in the market, so it is currently an unknown and something that is outside of the Council's control.
 - c) If another third party purchased the long leasehold property interests, they would be cooperative and supportive of the CCS scheme. This assumption is dependent on the goodwill of a third party that is unknown at this time and is something that is outside of the Council's control.
- 2.1.3 This option is based on several unknown assumptions and will not guarantee that if the Council adopts a "wait and see policy", that the long leasehold property interests will be available to purchase at some point in the future.
- 2.1.4 Following due consideration, the option of "Wait and Purchase Later" has been discounted for the reasons stated in 2.1.3.
- 2.2 Option 2 - Wait and CPO
- 2.2.1 This approach involves a decision not to purchase these long leasehold property interests now and waiting to pursue a CPO at the appropriate time in the project programme as currently scheduled.
- 2.2.2 This option is representative of the status quo and means the budget, programme and risk profile of the CCS project will continue on its current course with the project progressing as intended. However, it also means that the opportunity to shorten the timescale for land assembly would be lost to the project.
- 2.2.3 Following due consideration, the option of "Wait and CPO" has been discounted for the reasons stated in 2.2.4.
- 2.3 Option 3 Buy Now (Recommended)
- 2.3.1 This option involves taking a decision to purchase these long leasehold property interests in the CCS red line boundary area.
- 2.3.2 There are a number of benefits of making an early purchase of these long leasehold property interests, which are as follows:-
- a) Purchasing these long leasehold property interests would bring the largest third party property interest in the CCS red line boundary area under the Council's control.
 - b) Increasing the Council's control of the property interests in the CCS red line boundary area reduces the risk associated with scheme delivery.
 - c) Reducing the risk associated with scheme delivery is also likely to improve the project programme as the timescale for completing land assembly is likely to be reduced.
 - d) This decision will help to provide confidence in scheme deliverability for SPG, the developer, the WMCA and a development funder to invest in the scheme.
 - e) The early purchase of these long leasehold property interests would enable the early demolition of Coventry Point, thereby removing a significant eyesore and impediment to connectivity in the city centre.

- f) The interests are currently available, which might not be the case if they were purchased by another third party.

2.3.3 Following due consideration, the option of “Buy Now” is recommended for the reasons stated above.

3. Results of consultation undertaken

- 3.1 No consultation has been undertaken on this decision to date because it is not appropriate to consult on commercial deals.

4. Timetable for implementing this decision

- 4.1 The vendor has indicated that they wish to complete the sale of their long leasehold property interests by the end of this calendar year i.e. 31 December 2017.

5. Comments from Director of Finance and Corporate Services

5.1 Financial implications

This purchase will be funded from the £98.8m funding awarded by the WMCA in January 2017.

5.2 Legal implications

- 5.2.1 The Council has a general power to acquire land or premises used for the purposes of any of their functions by virtue of section 120 Local Government Act 1972.

- 5.2.2 The Council is required to comply with its statutory duty under section 123 of the Local Government Act 1972 to achieve best consideration reasonably obtainable to maximise its returns.

- 5.2.3 The proposal is to acquire the freehold of the largest third party interest within the CCS development scheme.

- 5.2.4 The proposed transaction as detailed in the report is considered to be an exempt land transaction for the purposes of EU Procurement Rules.

6. Other implications

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

The recommendations in this report will result in a step forward towards making the CCS scheme deliverable. The scheme itself is critical to Coventry's aspirations of creating a vibrant city centre environment for the benefit of its residents, with development of the city centre being an integral part of meeting these aspirations. The improved city centre environment is expected to increase footfall to the city centre and significantly broaden the catchment shopper population. This would elevate Coventry's position to become the second largest retail destination in the West Midlands.

The scheme presents a significant opportunity to act as an interface between the existing city centre projects and also to act as a catalyst for other private sector investment. This is therefore an exciting time for Coventry and is an opportunity for the city to develop an

offering of significant scale to differentiate itself through a unique shopping and leisure offering.

The scheme will also contribute to achievement of the Coventry Plan by delivering c1500 new permanent jobs and over 2,000 jobs during the construction period, and providing a positive impact on the local economy. It is estimated that the economic impact of increased daytime footfall will be £16.6m per annum and £3.8m from additional evening footfall.

The development of 130 PRS apartments, 150 private for sale residential apartments and 585 student beds, will increase city centre living in Coventry.

6.2 How is risk being managed?

The key risk associated with this proposal are as follows:-

- a) The due diligence undertaken fails to identify a key issue before completion of the purchase. This risk has been partially mitigated by conducting an analysis of the existing leases by the Council's legal team

6.3 What is the impact on the organisation?

The recommendations in this report have an impact on the Council's assets. In the short term additional assets will be acquired and in the medium term, they will need to be managed and maintained. In the long term, the assets will form part of the CCS development.

6.4 Equalities / EIA

There is no Public Sector Equality Duty implications of this decision, so there is no need to undertake an Equality Impact Assessment at this stage in the project process.

6.5 Implications for (or impact on) the environment

There are no implications for the environment as this decision will result only in a change in ownership of the specified long leasehold property interests and there will be no impact on the existing day to day operations undertaken in, of or by the interests purchased.

6.6 Implications for partner organisations?

The purchase of these interests has an impact on two of the Council's partners as follows:-

- a) WMCA – this purchase will help to expend financial resources and demonstrate that the CCS project is progressing, which will increase confidence that the scheme will be delivered.
- b) SPG – this purchase will help to reduce the risk and increase confidence in the Council to deliver its land assembly obligation, which will help to increase the overall scheme deliverability. Specifically, it will help the developer to demonstrate commitment to the scheme and market it to potential anchor stores and development funders.

Report author(s):**Name and job title:** David Cockroft, Director of City Centre and Major Projects Development**Directorate:** Place**Tel and email contact:** 02476 833964

david.cockroft@coventry.gov.uk

Enquiries should be directed to the above person.

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Lisa West	Project Manager	Place	26/10/17	26/10/17
Paul Beesley	Manager – Property Development, Disposal & Acquisitions	Place	26/10/17	27/10/17
Aimee Proctor	Programme Manager - Finance	People	26/10/17	30/10/17
Helen Williamson	Lead Accountant Capital & Grants Team	Place	26/10/17	30/10/17
Oluremi Aremu	Major Projects Lead Lawyer	Place	26/10/17	31/10/17
Names of approvers for submission: (officers and members)				
Finance: Phil Helm	Finance Manager	Place	26/10/17	30/10/17
Legal: Julie Newman	Legal Services Manager	Place	26/10/17	31/10/17
Director: Martin Yardley	Deputy Chief Executive (Place)	Place	01/11/17	02/11/17
Members:				
Name: Cllr O'Boyle	Cabinet Member for Jobs and Regeneration	N/A	03/11/17	03/11/17
Name: Cllr J Mutton	Cabinet Member for Strategic Finance and Resources	N/A	03/11/17	03/11/17

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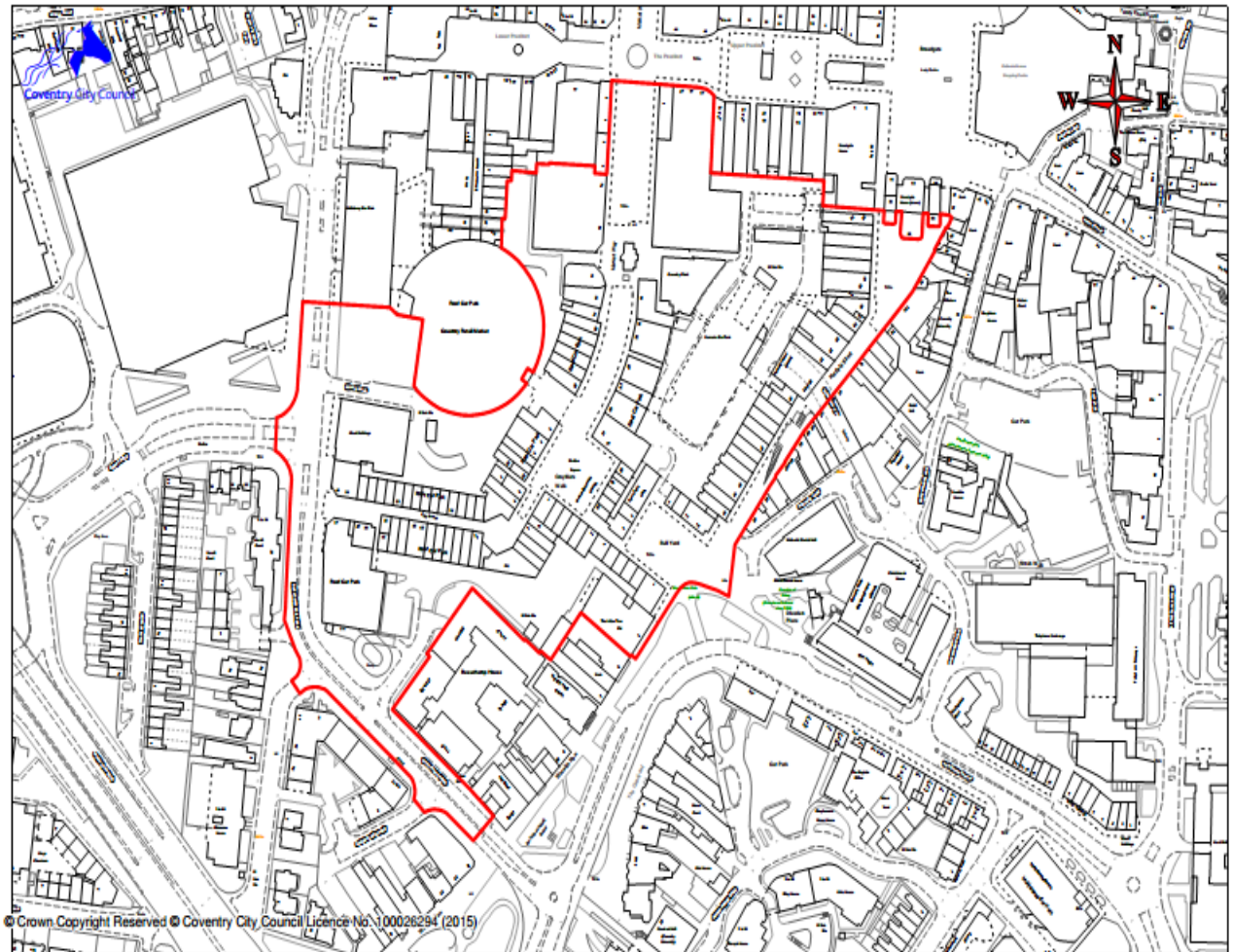
www.coventry.gov.uk/councilmeetings

Appendices

Appendix 1 – Plan detailing the City Centre South red line boundary area.

City Centre South, Coventry.

Scale at A4 1 : 1250

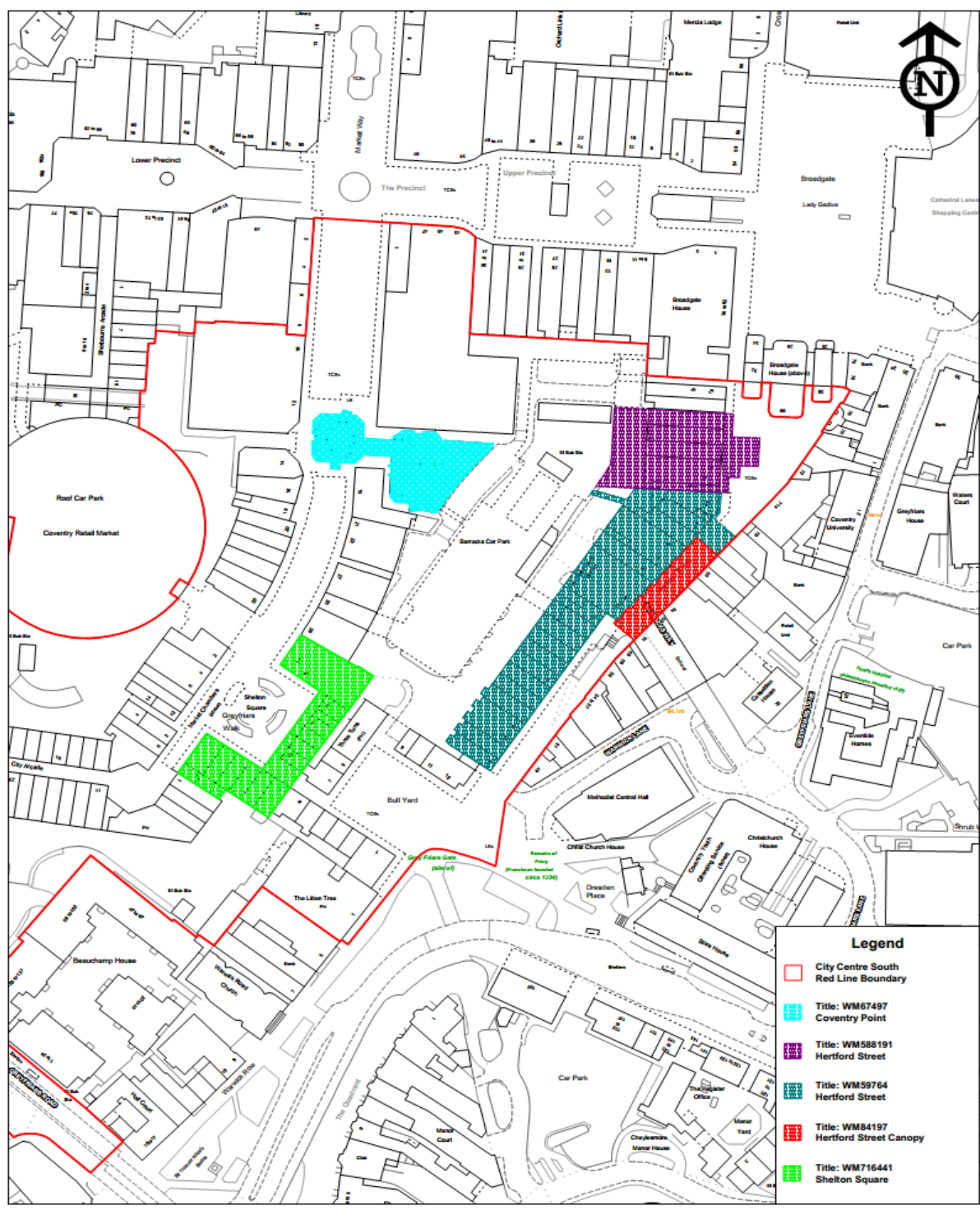


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Plan Production Date: 20/08/2015

This plan is for identification purposes only.

Appendix 2 – Plan detailing third party long leasehold property interests in the City Centre South red line boundary area.



Legend	
	City Centre South Red Line Boundary
	Title: WM67497 Coventry Point
	Title: WM588191 Hertford Street
	Title: WM59764 Hertford Street
	Title: WM84197 Hertford Street Canopy
	Title: WM716441 Shelton Square

PLACE DIRECTORATE
STRATEGY & PERFORMANCE TEAM
FLOOR 9, CIVIC CENTRE 4
MUCH PARK STREET
COVENTRY CV1 2PY
024 7683 2755



Coventry City Council

Title: Third Party Long Leasehold Property Interests - Ground Leases

Drawn By: NH
Scale: 1:1250 at A3
Date: 31/10/2017

Martin Yardley - Executive Director, Place
Richard Moon - Assistant Director, Project Management & Property Services

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A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains information relating to the financial and business affairs of any particular person (including the authority holding that information). The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

Cabinet
Council

28th November 2017
5th December 2017

Name of Cabinet Member:

Cabinet Member for Jobs and Regeneration – Councillor O’Boyle

Director Approving Submission of the report:

Deputy Chief Executive (Place)

Ward(s) affected:

All

Title:

National Battery Manufacturing Development Facility - Faraday Challenge

Is this a key decision?

Yes, as it has the potential to affect all wards within the city and expenditure is in excess of £1m.

Executive Summary:

More and more car manufacturers are announcing their intention to move towards building electric cars, and the demand for batteries will increase sharply over the next ten to twenty years. Currently, expertise in battery development is concentrated in Asia, Germany and the United States, and the UK is lagging behind.

The UK Government announced the Faraday Challenge, part of the Industrial Strategy Fund, during the summer. It aims to fund battery research and development work to ensure that the demand for batteries leads to the creation of jobs here in the UK rather than overseas in battery manufacturing.

One of the strands of the Faraday Challenge aims to bridge the gap between battery research in universities and large-scale battery production by car manufacturers.

The National Battery Manufacturing Development Facility (NBMDF) aims to bridge this gap by providing an environment where universities, SMEs and car manufacturers can collaborate on battery development using state of the art equipment.

The University of Warwick (UoW), Coventry & Warwickshire Local Enterprise Partnership (CWLEP) and Coventry City Council (CCC) have come together to develop a proposition in response to the Faraday Challenge set out by Government. The bid was submitted earlier in the autumn. The partnership has now got through to the final stage of the bidding process and an announcement on the successful bid is expected imminently from Government. We are confident that Coventry & Warwickshire offers the best solution for Government's aspiration in this area.

It has been estimated that the value of the NBMDF's work could be worth as much as £1bn to the economy, and create 10,000 jobs in the West Midlands.

The Council has significant role in making this happen by bringing its expertise to the partnership. This includes financial management, Government liaison, and a strong knowledge and experience in securing, managing and delivering economic development over many years in both Coventry and the wider sub region. In addition, the Council has proven track record in being the accountable body for successful large scale external funding and investment.

Recommendations:

Should the bid be successful, Cabinet is asked to recommend that Council:

- 1) Authorise that the Council accept the Faraday Challenge funding and to act as accountable body on behalf of the Coventry and Warwickshire Local Enterprise Partnership
- 2) Delegate authority to the Deputy Chief Executive (Place) and the Director of Finance and Corporate Services to accept the terms and conditions of the grant, to enter into the necessary agreement to secure the grant and add to the Capital Programme as necessary
- 3) Delegate authority to the Deputy Chief Executive (Place), following consultation with the Cabinet Member for Jobs and Regeneration, to:
 - determine the final content of the relevant business cases required to submit the bid to the West Midlands Combined Authority
 - submit the relevant Strategic Outline Business Cases to the West Midlands Combined Authority in relation to the work packages within the National Battery Manufacturing Development Facility Programme
 - progress the business cases to the final stage in accordance with the Combined Authority's Assurance Framework
- 4) Should the bids to the West Midland Combined Authority be successful; that Coventry City Council enters into the necessary legal documentations to secure the funding required to deliver the National Battery Manufacturing Development Facility Programme

Council is asked to:

- 1) Authorise that the Council accept the Faraday Challenge funding and to act as accountable body on behalf of the Coventry and Warwickshire Local Enterprise Partnership
- 2) Delegate authority to the Deputy Chief Executive (Place) and the Director of Finance and Corporate Services to accept the terms of conditions of the grant, to enter into the necessary agreement to secure the grant and add to the Capital Programme as necessary

- 3) Delegate authority to the Deputy Chief Executive (Place), following consultation with the Cabinet Member for Jobs and Regeneration, to:
- determine the final content of the relevant business cases required to submit the bid to the West Midlands Combined Authority
 - submit the relevant Strategic Outline Business Cases to the West Midlands Combined Authority in relation to the work packages within the National Battery Manufacturing Development Facility Programme
 - progress the business cases to the final stage in accordance with the Combined Authority's Assurance Framework
- 4) Should the bids to the West Midland Combined Authority be successful; that Coventry City Council enters into the necessary legal documentations to secure the funding required to deliver the National Battery Manufacturing Development Facility Programme

List of Appendices included:

None

Background papers:

None

Other useful documents

Faraday Challenge: <https://youtu.be/TGFRbGij29E>

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 – 5 December 2017

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Report title:

1. Context (or background)

- 1.1 In July, the UK Government announced the opening of the Faraday Challenge, a fund designed to ensure that the UK benefits from the rapid developments needed in battery technology to support the electrification of the motor industry over the next twenty years.
- 1.2 One of the strands within the Faraday Challenge is called 'battery scale up'. This theme calls for the establishment of a National Battery Manufacturing Development Facility (NBMDf) which will enable UK businesses to seize the opportunities presented by the transition to a low carbon economy and ensure the UK is one of the best places in the world to undertake the design, development and manufacture of batteries for the electrification of vehicles.
- 1.3 Coventry and Warwickshire Local Enterprise Partnership (CWLEP), and WMG (Warwick University's specialist manufacturing division) who are the preferred partners have developed a proposal to establish the NBMDf and new building in Coventry and Warwickshire.
- 1.4 A local contribution will also be requested through the West Midlands Combined Authority Devo Deal 2, and the proposal has the full support of the West Midlands Mayor.
- 1.5 In its role as accountable body for CWLEP's economic development programmes, the Council's Economic Development Team has been closely involved in the development of the NBMDf proposal, and will enter into the grant agreement with Government in order to secure the funding for the project.
- 1.6 Economic modelling work completed as part of the bid submission process estimates the potential benefit of the NBMDf to the UK economy as approaching £1bn, as it safeguards the UK auto industry against the decline in internal combustion engine manufacturing. The overall European battery supply chain is estimated to grow to £50bn over the next twenty years, and up to 10,000 jobs could be created in the West Midlands as a result.

2. Options considered and recommended proposal

- 2.1 The preferred option is for a consortium consisting of Coventry City Council, CWLEP and WMG to work together to develop a proposal to establish the NBMDf in the area. This option has been selected because it makes the most of the strengths of the three organisations involved in the consortium whilst giving the Council a significant amount of control over the way in which the facility is established, the ability to ensure that all public funding requirements are met, and that the economic development benefits are realised.
- 2.2 An alternative approach would have been for WMG to apply directly to the Faraday Challenge and establish the NBMDf itself without the direct involvement of CCC or CWLEP. Although this option would be attractive in that the benefits of the NBMDf could be secured without presenting any additional costs or risks to the Council, there is a danger that without the direct involvement of CCC and CWLEP, WMG may have found it necessary to locate the facility on a site out of the Coventry area, and the considerable economic development benefits of securing this facility would be lost.

- 2.3 Finally, it may have been possible for the partnership to bid for Faraday Challenge grant, before going out to the market in order to procure an operator for the facility. This option is not practical because the facility is designed to be a public intervention to ensure that developments in battery technology happen in the UK which private companies would either do overseas or not do at all. Therefore, looking for an existing private operator of the facility on the open market was not a viable option for the partnership. There are also very tight timescales attached to Faraday Challenge funding; the facility must be open within two years of the initial grant award, and it would not be possible to complete such a procurement exercise and still have the facility open during this period.

3. Results of consultation undertaken

- 3.1 In preparation of the bid to the Faraday Challenge, CCC, CWLEP and WMG have consulted widely with the UK auto industry on the need for the NBMDf, and the right way to approach the advances in battery technology that the Faraday Challenge calls for. Over 40 letters of support have been received for the proposal, and representatives from Jaguar Land Rover, Nissan, and battery specialists AGM all joined the presentation team when the project was called to a Government assessment panel in October 2017.
- 3.2 A local stakeholder's event was held at the Coventry and Warwickshire Growth Hub was held for representatives from District Councils, FE colleges, Universities and the Chamber of Commerce in September, and the response from the attendees was overwhelmingly positive.

4. Timetable for implementing this decision

- 4.1 The terms of the Faraday Challenge grant funding say that the facility must be operational within 24 months of the grant award, which was made in November. This requires the partners to take immediate action in order to get the joint venture private Limited Company set up, begin work on planning consents and construction contracts etc. This should allow the building work and fit out to be completed in time to meet the Faraday Challenge deadline for having the facility up and running in late 2019.

5. Comments from Director of Finance and Corporate Services

5.1 Financial implications

- 5.1.1 The recommendations seek authority to accept grant funding for the purpose of constructing, fitting out the facility and managing the project for the first five years for which the Council will act as accountable body.
- 5.1.2 The exact capital costs are yet to be finalised, but the capital elements of the scheme will need to be added to the Council's capital programme once details are finalised.

5.2 Legal implications

- 5.2.1 There are no legal implications of accepting the Faraday Challenge Grant, other than to fulfil the terms of and conditions of the grant award as set out by Government. The Council's Economic Development Service will be responsible for ensuring that the grant is managed correctly, and Legal Services will provide the necessary support.

6. Other implications

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

6.1.1 The establishment of the NBMDf will make a significant contribution to the Council Plan. Coventry is already a focal point for the UK auto industry, and securing the NBMDf will make the area hugely attractive to investors from the industry. The manufacture in Internal Combustion Engines is expected to decline steadily over the next twenty years as more and more car manufacturers plan to move towards electric fleets. It is expected that the market for battery technology in the EU will be worth as much as EUR50Bn during this period, and with the NBMDf operating in Coventry this will provide an excellent incentive for inward investment and job creation, in line with the aims of the Council Plan.

6.2 How is risk being managed?

6.2.1 Detailed work on risk management has been completed by the joint CCC-CWLEP-WMG project team, and considerable resources have been devoted to assessing these risks and planning mitigation actions. A risk register compliant with current City Council processes will be completed and made available should the bid be successful.

6.3 What is the impact on the organisation?

6.3.1 This project is likely to generate additional work for the Council, and it is anticipated that a new dedicated Project Manager post will be created in order to ensure that the building and equipment procurement happens smoothly over the two-year setup period for the facility. Establishing the NBMDf will also require officer time from existing staff in Finance, Legal and Procurement teams. The costs for both the new posts and existing officer time will be recovered from the Faraday Challenge grant income.

6.4 Equalities / EIA

6.4.1 This project is not expected to have any negative equalities impacts. When the joint venture company is established, CCC and CWLEP will place requirements upon the new company to ensure that appropriate equalities impact assessment work takes place as it begins to run its services.

6.5 Implications for (or impact on) the environment

6.5.1 This project has the potential to have a positive environmental impact. As the UK auto industry moves to electrification there will be a huge reduction in emissions from road vehicles on the country's road. The work of the NBMDf aims to speed up this transition, and should therefore have a positive environmental impact.

6.6 Implications for partner organisations?

6.6.1 Establishing the NBMDf here will allow the University of Warwick and WMG to cement their position among the top universities in the world for advanced engineering and automotive R&D. In turn this will lead to further benefits for the city.

Report author(s):**Name and job title:**

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Economic Development Service

Directorate:

Place

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Richard Moon	Director of Property and Project Management	Place	14/11/17	10/11/17
Oluremi Aremu	Major Projects Lead Lawyer	Place	14/11/17	16/11/17
Phil Helm	Finance Manager	Place	14/11/17	16/11/17
Lara Knight	Governance Services Co-ordinator	Place	14/11/17	15/11/17
Mick Burn	Head of Procurement & Commissioning	People	14/11/17	16/11/17
Names of approvers for submission: (officers and members)				
Barry Hastie	Director of Finance & Corporate Services	Place	14/11/17	16/11/17
Julie Newman	Legal Services Manager	Place	14/11/17	16/11/17
Martin Yardley	Deputy Chief Executive	Place	14/11/17	16/11/17
Cllr Jim O'Boyle	Cabinet Member Regeneration & Jobs	n/a	14/11/17	16/11/17

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Cabinet

28th November 2017

Name of Cabinet Member:

Cabinet Member for Policy and Leadership – Councillor G Duggins

Director approving submission of the report:

Deputy Chief Executive (Place)

Ward(s) affected:

N/A

Title:

Outstanding Issues

Is this a key decision?

No

Executive summary:

This report is to identify those issues on which further reports have been requested or are outstanding so that Members are aware of them and can monitor their progress.

Recommendations:

The Cabinet are recommended to consider the list of outstanding items as set out below, and to ask the Member of the Management Board concerned to explain the current position on those which should have been discharged at this meeting or an earlier meeting.

List of Appendices included:

Table of outstanding issues

Other useful background papers:

None

Has it or will it be considered by scrutiny?

N/A

Has it, or will it be considered by any other council committee, advisory panel or other body?

No

Will this report go to Council?

No

**Report title:
Outstanding Issues**

1. Context (or background)

- 1.1 In May 2004, the City Council adopted an Outstanding Minutes system, linked to the Forward Plan, to ensure that follow-up reports can be monitored and reported to Members.
- 1.2 The Table appended to the report outlines items where a report back has been requested to a future Cabinet meeting, along with the anticipated date for further consideration of the issue.
- 1.3 Where a request has been made to delay the consideration of the report back, the proposed revised date is identified, along with the reason for the request.

2. Options considered and recommended proposal

- 2.1 N/A

3. Results of consultation undertaken

- 3.1 N/A

4. Timetable for implementing this decision

- 4.1 N/A

5. Comments from Executive Director of Resources

- 5.1 Financial implications

N/A

- 5.2 Legal implications

N/A

6. Other implications

- 6.1 **How will this contribute to achievement of the council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Coventry Sustainable Communities Strategy?**

N/A

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

This report will be considered and monitored at each meeting of the Cabinet

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

N/A

6.4 Equalities / EIA

N/A

6.5 Implications for (or impact on) the environment

N/A

6.6 Implications for partner organisations?

N/A

Report author(s):

Name and job title:

Lara Knight
Governance Services Co-ordinator

Directorate:

Place

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Contributor/approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Names of approvers: (officers and Members)				

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	Subject	Minute Reference and Date Originally Considered	Date For Further Consideration	Responsible Officer	Proposed Amendment to Date For Consideration	Reason for Request To Delay Submission Of Report
1.	Coventry Station Masterplan Update Report on proposed constructor contract appointments	Minute 101/16 24 th January 2017	March 2018	Deputy Chief Executive (Place) - Colin Knight		
2.	Friargate Update Report Further report on Council buildings to be retained, investment to maintain them in use for operational purposes, and any other mitigation measures.	Minute 105/16 24 th January 2017	December 2017	Deputy Chief Executive (Place) - David Cockroft		
3.	Further report on investment to maintain Broadgate House in use for operational purposes and any other mitigation measures.	Minutes 28/17 and 32/17 1 st August 2017	December 2017	Deputy Chief Executive (Place) - Richard Moon/ Nigel Clews		

* identifies items where a report is on the agenda for your meeting.

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of the Local Government Act 1972.

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