

**Time and Date**

2.00 pm on Tuesday, 13th July, 2021

**Place**

Council Chamber, Council Chamber, Council House, Earl Street, Coventry CV1 5RR

**Please note that in line with current COVID regulations, there will be limited public access to the meeting to ensure social distancing. If you wish to attend in person, please contact the Governance Services Officers indicated at the end of the agenda**

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**Public business**

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 6)
  - (a) To agree the minutes from the meeting of Cabinet on 15<sup>th</sup> June 2021
  - (b) Matters arising
4. **Revenue and Capital Outturn 2020/21** (Pages 7 - 44)  
Report of the Director of Finance
5. **Local Development Scheme** (Pages 45 - 62)  
Report of the Director of Streetscene and Regulatory Services
6. **Adoption of Statement of Community Involvement** (Pages 63 - 118)  
Report of the Director of Streetscene and Regulatory Services
7. **Outstanding Issues**  
There are no outstanding issues
8. **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**

Nil

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Julie Newman, Director of Law and Governance, Council House, Coventry

Monday, 5 July 2021

Note: The person to contact about the agenda and documents for this meeting is:  
Michelle Salmon, Governance Services,, Email: michelle.salmon@coventry.gov.uk

### Membership

Cabinet Members:

Councillors R Brown, K Caan, G Duggins (Chair), P Hetheron, A S Khan (Deputy Chair), M Mutton, J O'Boyle, K Sandhu, P Seaman and D Welsh

Non-voting Deputy Cabinet Members:

Councillors P Akhtar, B Gittins, G Hayre and G Lloyd

By invitation:

Councillors P Male and G Ridley (Non-voting Opposition representatives)

### **Public Access**

Please note that in line with current COVID regulations, there will be limited public access to the meeting to ensure social distancing.

Any member of the public who would like to attend the meeting in person is required to contact the officer below in advance of the meeting regarding arrangements for public attendance.

**Michelle Salmon**

**Governance Services**

**Email: michelle.salmon@coventry.gov.uk**

# Agenda Item 3

## Coventry City Council

### Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 15 June 2021

Present:

Cabinet Members: Councillor G Duggins (Chair)  
Councillor A S Khan (Deputy Chair)  
Councillor R Brown  
Councillor K Caan  
Councillor M Mutton  
Councillor J O'Boyle  
Councillor K Sandhu  
Councillor P Seaman  
Councillor P Hetherton  
Councillor D Welsh

Non-Voting Deputy

Cabinet Members: Councillor P Akhtar  
Councillor B Gittins  
Councillor G Hayre  
Councillor G Lloyd

Non-Voting Opposition  
Members:

Councillor P Male  
Councillor G Ridley

Other Non-Voting  
Members:

Councillor N Akhtar  
Councillor L Bigham  
Councillor J Clifford  
Councillor R Lakha  
Councillor C Miks  
Councillor R Singh  
Councillor C Thomas

Employees (by Service):

Chief Executive M Reeves (Chief Executive)  
Deputy Chief Executive N Hart (Communications)  
Finance B Hastie (Director of Finance)  
Law and Governance J Newman (Director of Law and Governance), S Bennett,  
M Salmon,  
Public Health and Wellbeing L Gaulton (Director of Public Health and Wellbeing),  
R Chapman  
Streetscene and Regulatory Services C Hickin, P Hibberd

Apologies:

Councillor J Innes

## **Public Business**

### **1. Declarations of Interest**

There were no disclosable pecuniary interests.

### **2. Minutes**

The minutes of the meeting held on 9<sup>th</sup> March 2021 were agreed as a true record.

There were no matters arising.

### **3. Proposed Renewal of the City-Wide Public Space Protection Order**

The Cabinet considered a report of the Director of Streetscene and Regulatory Services that sought approval to renew the Dog related Public Space Protection Order (PSPO) that was last approved in 2018 and was due to expire on 29<sup>th</sup> August 2021. The proposed draft Order, maps of relevant areas and impact statements were provided as appendices to the report.

The Order was required to assist with the enforcement of dog fouling offences, but also to specify: where dogs should be kept on leads, where dogs were prohibited, the maximum number of dogs that could be walked by one person and enabled officers to request that a dog be put on a lead if problems were ensuing. The Order would provide for the continued use of powers to address matters pertaining to the control and management of dogs in the City, with a particular focus within parks in the City. It was devised following extensive consultation and collaboration with a number of stakeholders in the City, a number of which had provided impact statements detailed in an Appendix to the report.

The City Council believed that the Order was currently working very well, was fit for purpose and enabled people to enjoy parks and public spaces whilst providing clear guidance as to when it was and wasn't appropriate to allow dogs to exercise off leads or when they needed to be under the direct control of their owner. There was a high level of compliance with the Order, this could be seen by reference to the relatively low levels of enforcement Council officers had to use and this was referred to in the Impact Statement from the Pest Control and Animal Welfare manager.

**RESOLVED that the Cabinet approves the renewal of the Public Space Protection Order for a further three years and made the Order effective on 28<sup>th</sup> August 2021m this being the day before the existing order was due to expire.**

#### 4. **Domestic Abuse Act 2021**

The Cabinet considered a report of the Deputy Chief Executive on the Council's new duties under the Domestic Abuse Act 2021.

Domestic abuse was a manifestation of one-person (or persons) exerting power and control over another with whom they shared a personal connection. Domestic abuse could take many forms including, but not limited to, psychological, physical, sexual, financial and emotional abuse. It also included honour-based violence, forced marriage, other culturally recognised forms of abuse and a range of controlling and coercive behaviours. The Domestic Abuse Act 2021 also highlighted economic abuse.

Preventing harm from Domestic Abuse was a priority within Coventry and was a key measure within the One Coventry Corporate Plan. Coventry's Domestic Abuse Strategy 2018–2023 outlined the city's approach to addressing domestic abuse, including honour-based violence and forced marriage.

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act provided, for the first time, a statutory definition of domestic abuse and delivered a number of significant changes to improve the protection of victims within the community and the criminal justice system.

The Act had a number of implications for the Council, as a Tier 1 Local Authority, including the requirement that a new statutory board be created, the implementation of a statutory definition of domestic abuse, a duty to produce regular needs assessments and strategies, delivery of specific minimum types of support for victims within safe accommodation, the prioritisation of domestic abuse victims within homelessness applications and a requirement to annually report to the Secretary of State.

The Government had provided Coventry City Council with a grant of £849,930 in 2021/22, for the purpose of and the expectation that the Council started to prepare and fulfil the relevant functions under the duty. No funding had been provided beyond 2021/22 and the Ministry of Housing, Communities and Local Government stated that any further funding would be confirmed as part of the Government's Comprehensive Spending Review. The Grant terms did not include a requirement for spend to be completed by 31st March 2022, and as detailed in paragraphs 1.16 and 1.29 of the report, the plan was to commit the grant over the period up to 30th September 2022 to reflect time for the needs assessment to be completed as well as further commissioning activity.

#### **RESOLVED that the Cabinet:**

- 1) **Approves the proposal to create the Domestic Abuse Local Partnership Board as a statutory board of the local authority.**
- 2) **Approves acceptance of the grant of £849,930 in 2021/2022 from the Ministry of Housing, Communities and Local Government to fulfil the functions of the new statutory duty on Tier 1 Local Authorities relating to the provision of support to victims of domestic abuse and their children residing within safe accommodation.**

**3) Notes the Council's new duties under the Domestic Abuse Act 2021.**

**5. Outstanding Issues**

There were no outstanding issues.

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

There were no other items of public business.

(Meeting closed at 2.40 pm)



Cabinet  
Audit and Procurement Committee  
Council

13<sup>th</sup> July 2021  
26<sup>th</sup> July 2021  
7<sup>th</sup> September 2021

**Name of Cabinet Member:**

Strategic Finance and Resources – Councillor R Brown

**Director Approving Submission of the report:**

Director of Finance

**Ward(s) affected: All**

**Title:**

Revenue and Capital Outturn 2020/21

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**Is this a key decision?**

Yes -

The report deals with financial matters in excess of £1.0m including specific new recommendations to allocate resources within the outturn position.

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**Executive Summary:**

This report outlines the final revenue and capital outturn position for 2020/21 and reviews treasury management activity and 2020/21 Prudential Indicators reported under the Prudential Code for Capital Finance.

The 2020/21 financial year has been one like no other, with organisational and financial impacts exceeding anything experienced previously during peacetime. Some of these impacts are unseen in consideration of the Council's outturn position – for instance Business Rates reliefs provided and business grants paid out through the year – but their scale has been staggering nonetheless. The purpose of this report is not to catalogue the changes to society and Council services through the year although where these have had a financial effect on the Council this will be outlined.

The overall financial position includes the following headline items:

- A balanced revenue position after a recommended **£9.2m** is set aside in reserves to enable the city's recovery from Covid, invest in the Council's key priorities and strengthen the Council's financial sustainability.
- Capital Programme expenditure of **£194.2m** which represents the second largest programme in the modern era.
- An increase in the level of available Council revenue reserves from £90m to **£123m** including Covid funding and the net underspend contribution.

Further detail includes:

- A net underspend of £8.5m within central budgets after adjusting for the impact of Covid resulting overwhelmingly from one-off circumstances and the application of resources to fund previously approved decisions.
- A revenue underspend of £3.4m within Housing and Homelessness due in large part to the number of households living in temporary accommodation being lower than anticipated.
- Identified income loss and expenditure related to the COVID-19 of £31m funded in-part by in-year Government emergency funding and sales fees and charges compensation grants provided for this purpose.
- A shortfall in this in-year Covid funding of £2.2m.

The underlying revenue position has improved by £8.7m since Quarter 3 when an underspend of £0.5m was forecast. In particular the overall underspend (before outturn reserve contributions) and the improved position relates to improvements within Contingency and Central budgets which are set out in the report. In overall terms the favourable outturn position shown must be put in the context of the Covid-19 crisis. The position is an indication of the prudent management of the Council's financial position but there are reasons to be cautious about the financial future of local government. These are explored more fully in the financial implications section of the report but can be seen in the uncertain future for local government finance nationally, the externalised and more volatile nature of some of the Council's financial relationships and the continued and potential legacy impacts of Covid. On this basis it is entirely appropriate for the Council to maintain a robust financial position and to retain control of its own financial destiny as far as it is able. This is important not just as an internal Council matter but connects directly to the Council's capacity to improve services for residents and invest in the city and its communities.

As indicated above the financial impact of Covid on the Outturn position has been estimated at £31m. This is not a definitive figure because in many cases the Covid impact is difficult to disentangle from other trends – for instance, how much of the large reduction in car parking income might have happened without the Covid pandemic. What is known is that Government funding provided through 2020/21 has covered a very significant proportion of the cost although this doesn't take account of the loss in Business Rates and Council Tax income calculated to have been suffered.

Further financial loss due to Covid has continued into the early months of 2021/22 at a much reduced rate compared with 2020/21 although it remains difficult to provide a reliable estimate of this. The Council has been able to carry forward into 2021/22 £7.55m of Covid resources set aside as part of the 2019/20 outturn position and has been allocated £11m out of the Government's emergency Covid funding for 2021/22. Other specific Covid grants have also been announced whilst a further opportunity is likely to be available to claim compensation for lost income in the first quarter of the year. On this basis there is a strong possibility that the Council will be able to manage the large majority of the financial Covid impact from Government resources over the medium term. Given that the Covid impact will extend into 2022/23 and that a tight funding settlement is anticipated from Government next year it is important that the Council continues to maintain a strong financial position to protect itself in what could be a very challenging financial environment. The recommended proposals, put forward by the Director of Finance - the Council's Section 151 officer - are reflected below and explained in section 5.1 of the report.

**Recommendations:**

**Cabinet is recommended to approve:**

- 1) The final revenue outturn position including reserve contributions of £9.2m available from the year-end revenue bottom line for the purposes described in Section 5.1 of the report.
- 2) The final capital expenditure and resourcing position (section 2.3 and Appendix 2 of the report), incorporating expenditure of £194.2m against a final budget of £226.9m; £32.5m expenditure rescheduled into 2021/22 and a net overspend £0.2m.
- 3) The outturn Prudential Indicators position in section 2.4.4 and Appendix 3 of the report.

**Cabinet is requested to recommend to the Council:**

- 4) Approval of reserve contribution of £9.2m available from the year-end revenue bottom line for the purposes described in Section 5.1 of the report.

**Audit and Procurement Committee is recommended to:**

- 1) Consider the contents of the report and determine whether there are any issues which it wants to refer to the Cabinet Member for Strategic Finance and Resources.

**Council is recommended to:**

- 1) Approve reserve contribution of £9.2m available from the year-end revenue bottom line for the purposes described in Section 5.1 of the report.

**List of Appendices included:**

Appendix 1 - Detailed breakdown of Directorate Revenue Variations  
Appendix 2 - Capital Programme Changes and Analysis of Rescheduling  
Appendix 3 - Prudential Indicators

**Other useful background papers:**

None

**Has it been or will it be considered by Scrutiny?**

No

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

Yes - Audit and Procurement Committee 26<sup>th</sup> July 2021

**Will this report go to Council?**

Yes – 7<sup>th</sup> September 2021

**Report title:** Revenue and Capital Outturn 2020/21

**1. Context (or background)**

- 1.1 This report sets out the Council’s revenue and capital outturn position for 2020/21 and performance against its Prudential Indicators for the year. The City Council set a revenue budget for the year of £238.8m and a Capital Programme of £232.7m.
- 1.2 The reported figures show the Council's financial position in relation to management accounts used to monitor performance through the year. The Audit and Procurement Committee will consider separately the Council's statutory Statement of Accounts.

**2. Options considered and recommended proposal**

**2.1 Revenue Outturn**

2.1.1 Table 1 below summarises the outturn position, a balanced position after contributions to reserves recommended in this report of £9.2m. The final column reflects an assumption that the impact of Covid on individual services is funded by the Government grant available to the Council.

**Table 1 Summary Outturn Position**

<b>Service Area</b>	<b>Revised Net Budget £m</b>	<b>Actual Spend £m</b>	<b>Less Covid Cost/ Income £m</b>	<b>Spend Over/ (Under) Budget £m</b>
Adult Social Care	79.0	79.9	0.9	0.0
Business Investment & Culture	7.2	8.8	1.4	0.2
Children & Young People’s Services	71.1	76.7	5.4	0.2
Contingency & Central Budgets	10.7	(23.7)	(25.9)	(8.5)
Directorate Management	1.4	1.4	0.0	0.0
Education and Inclusion	15.2	14.7	(0.4)	(0.1)
Finance	3.2	4.8	1.7	(0.1)
Housing and Transformation	14.6	14.1	3.0	(3.5)
Human Resources	1.3	1.3	0.1	(0.1)
Legal and Governance Services	3.6	4.9	0.7	0.6
Project Management & Property	(4.6)	(2.4)	2.2	0.0
Public Health	2.6	2.6	0.0	0.0
Streetscene and Regulatory	29.1	36.2	7.6	(0.5)
Transportation & Highways	4.4	10.3	5.7	0.2

Bottom Line Covid Adjustment			(2.2)	2.2
Contributions to Reserves	0.0	9.2		9.2
<b>Sub-Total</b>	<b>238.4</b>	<b>238.4</b>	<b>0.0</b>	<b>*0.0</b>

\*The position is shown after reserve contributions recommended in this report amounting to £9.2m which reflects underspent budget across the Council's bottom line.

The quarter 3 position reflected an underspend of £0.5m. Prior to the recommended £9.2m contribution to the Reset and Recovery reserve the outturn position showed an additional favourable movement of £8.7m. This included:

- Contingency and Central Budgets - £5.6m favourable
- Housing and Transformation - £1.4m favourable

The reasons for these variations are included in the explanations of overall budgetary variations below.

### 2.1.2 Explanation of Variations

#### **Contingency and Central (£8.5m Underspend)**

This area was forecast to underspend by £2.9m at Quarter 3. The key reason for the favourable movement relates to £3.8m lower than forecast superannuation costs payable to the West Midlands Pension Fund. The Council's up-front payment of contributions covering 2020/21 to 2022/23 can be volatile depending on overall payroll costs over this period. The actual cost in 2020/21 is towards the low end of expectations compared with a prudent budget assumption.

A similar position has also arisen relating to income from the Coventry and Warwickshire Business Rates Pool for which the year-end position reflects income above budget of £1.6m. Significant uncertainties have been present in 2020/21 around the collection of Business Rates income during the pandemic and national uncertainties over potential business rating appeals being considered by the Valuation Office Agency. In the event, these circumstances have not prevented pooling income being delivered well above the Council's prudent budget estimate.

The net Asset Management Revenue Account position is an underspend of £3.0m. The overall favourable position includes higher than budgeted interest income on the Council's investments and lower than budgeted borrowing interest costs. Consistent with the 'Non-Covid Forecast Variation' in Table 1, the position excludes the impact of not receiving budgeted dividend income of £1.9m from Birmingham Airport and Coombe Abbey Park Limited (CAPL) as a result of Covid. Further dividend loss from these sources has been planned for within the 2021/22 Budget. The Council's re-financing of CAPL agreed by Council in March 2021 is designed to enable the company continue on a secure financial basis and to honour its future rent and loan repayment commitments to the Council.

#### **Directorate - Covid-Related**

Most of the outturn variations result from an assessment of the impact of COVID-19 across the City Council totalling c£31m although differentiating between Covid and non-Covid costs can only be an estimate. These variations stood at £34m at Quarter 3.

Children and Young People's Services has accounted for a significant amount of the overspend caused both by the total number and higher average unit cost of placements plus continued reliance on agency staff to manage the increase in caseloads. Contain Outbreak

Management Fund grant of £2.7m has been applied, leaving an overspend of £5.6m. Of this **£5.4m** is judged to be the result of Covid leaving a net overspend of £0.2m. The overall overspend has reduced from Quarter 3 due to placement numbers not increasing by as much as anticipated following the ending of the January lockdown. In addition an increased amount of the overspend has been judged to result from Covid conditions.

A significant proportion of Covid impacts relate to income which has not been achievable under lockdown or which may not be achievable in subsequent months whilst recovery takes place. This includes **£5.4m** in respect of significantly reduced car parking, bus gate and parking enforcement activity and **£1.8m** potential rent losses and associated pressures in respect of the Council's commercial property portfolio. Other lower but still significant Covid related income shortfalls have been reported in other service areas including land charges, court costs, planning, commercial waste, parks, the Outdoor Education Service and other school traded services.

Covid has also resulted in expenditure pressures across a range of other services including; waste disposal and safe working costs within Waste and Street Services of **£3.5m**, Personal Protective Equipment costs of **£1.7m**; Adult Social Care costs of **£1.6m**, provision of emergency mortuary capacity of **£1.3m**; and the impact on the cost of housing rough sleepers during lockdown and expected activity increase in housing of **£1.0m**.

#### Directorate - Non-Covid

The year-end position also includes a small number of variations which are separate from those attributable to Covid.

The non-Covid £3.5m underspend within Housing and Homelessness reflects a lower than anticipated number of households living in temporary accommodation. In part this has been the result of the Council's efforts to provide cheaper and more suitable temporary accommodation with additional robust management processes in place for contracts, voids, preventions and move-ons. It is likely that the continued Covid related evictions ban will have been helpful in this respect in 2020/21 and it will be important to monitor the degree to which the reduction in temporary accommodation numbers is sustained into the new financial year.

The £0.6m overspend within Legal and Governance Services reflects additional agency staff cost and the cost of external legal fees for care proceedings.

#### Covid-Related Grants

The Government has announced a range of grant funding allocations to manage the financial impact of COVID-19 and deliver services to mitigate or address the effects of the pandemic. The top two lines amounting to £28.8m have been applied to mitigate financial impacts described in Table 1. The remainder have been applied as specific grant which nets off the relevant expenditure within service areas.

**Table 2: Covid Funding Allocations\***

	2020/21 Grant Income In-Year
	£000
Emergency Funding**	(22,783)

Sales, Fees and Charges Income Loss	(6,024)
Contain Outbreak Management Fund	(3,198)
Hospital Discharge Scheme	(1,355)
Infection Control Fund (Round 1 and 2)	(1,381)
Community Testing (Lateral Flow Testing)	(1,346)
Catch-Up Premium	(1,089)
Covid Winter Grant Scheme	(1,010)
ASC Workforce Capacity Fund	(766)
Local Authority Test and Trace Service	(626)
Next Steps Accommodation Programme (CCC revenue element)	(533)
Coronavirus Job Retention Scheme	(503)
Community Champions Funding	(499)
Emergency Assistance Grant for Food & Essential Supplies	(479)
Clinically Extremely Vulnerable	(425)
Re-Opening High Streets Safely Fund	(285)
Compliance and Enforcement (Surge) Grant	(222)
Additional Dedicated Home to School and College Transport	(195)
Adult Social Care Rapid Testing Fund	(152)
Holiday Activities and Food Programme	(151)
Business Improvement Districts Support Funding	(21)
	<b>(43,043)</b>

\* A further £8.3m has been received but is treated as receipts in advance in accounting terms and is not available to spend until grant conditions have been met. This includes £6.1m for the Contain Outbreak Management Fund.

\*\*A further £7.55m was carried forward from 2019/20.

The table includes grant funding to fund the Council's expenditure on the Covid response or to compensate the Council for the financial impact on its expenditure and income in the delivery of services. A further £15m of funding has been received to fund locally determined support programmes for businesses and individuals including the Additional Restrictions Grant to businesses and the Council Tax Hardship Grant. It is envisaged that Scrutiny Board 1 will receive a report setting out more fully the financial impact of Covid on the Council within 2021/22.

## 2.2 Reserves

2.2.1 The Council's revenue reserve balance at the end of 2020/21 is £122m compared with £90m at the end of 2019/20. Balances generated from capital receipts and capital grants to fund future capital projects have decreased from £33m to £27m and reserve balances belonging to or earmarked to support schools have increased from £21m to £27m. The total reserve movement in 2020/21 is summarised in the table below.

**Table 3 Summary of Reserve Movements in 2020/21**

	1st April 2020	(Increase)/ Decrease	31st March 2021
	£000	£000	£000
<u>Council Revenue Reserves</u>			
General Fund Balance	(10,277)	0	(10,277)
Adult Social Care	(3,017)	(9,651)	(12,668)
Private Finance Initiatives	(9,467)	(1,527)	(10,994)
Early Retirement and Voluntary Redundancy	(9,323)	0	(9,323)
Potential Loss of Business Rates Income	(7,735)	0	(7,735)
Covid-19 Government Funding	(7,558)	0	(7,558)
Innovation and Development Fund	(5,549)	0	(5,649)
Reset and Recovery	(5,467)	0	(5,467)
City of Culture Readiness	(1,842)	(3,122)	(4,964)
Air Quality	(641)	(3,876)	(4,517)
Commercial Developments	(4,419)	0	(4,419)
Management of Capital	(5,564)	1,536	(4,028)
City of Culture	(4,000)	1,500	(2,500)
Insurance Fund	(721)	(1,327)	(2,048)
Public Health	(1,356)	(398)	(1,754)
Other Directorate	(11,187)	(3,962)	(15,149)
Other Corporate	(1,797)	(11,803)	(13,500)
<b>Total Council Revenue Reserves</b>	<b>(89,920)</b>	<b>(32,630)</b>	<b>(122,550)</b>
<b>Extra-Ordinary Item - Covid Business Rates Relief</b>	<b>0</b>	<b>(48,302)</b>	<b>(48,302)</b>

<u>Council Capital Reserves</u>		0	
Useable Capital Receipts Reserve	(31,099)	6,363	(24,736)
Capital Grant Unapplied Account	(1,834)	6	(1,828)
<b>Total Council Capital Reserves</b>	<b>(32,933)</b>	<b>6,369</b>	<b>(26,564)</b>
<u>School Reserves</u>			
Schools (specific to individual schools)	(18,007)	(4,289)	(22,296)
Schools (related to expenditure retained centrally)	(3,298)	(1,509)	(4,807)
<b>Total Schools Reserves</b>	<b>(21,305)</b>	<b>(5,798)</b>	<b>(27,103)</b>
<b>Total Reserves</b>	<b>(144,158)</b>	<b>(80,361)</b>	<b>(224,519)</b>

2.2.2 It should be noted that the Council's reserve balances include an extra-ordinary balance of £48m at the end of 2020/21. Government Covid Business Rates reliefs announced in 2020/21 had the effect of reducing the amount of Business Rates payable in-year causing a deficit within the Business Rates Collection Fund. Accounting rules mean that the corresponding grant (from Government) cannot be applied to the Collection Fund until 2021/22 and must be carried forward within General Fund reserves. This treatment will be common to all billing authorities across England. To ensure like for like comparisons this balance is treated as an extra-ordinary item here.

2.2.3 The main increases in the Council's revenue reserves stem from the £9m recommended as part of this report, £9m in relation to grant funding which will sustain the medium term Adult Social Care financial model, £4m to continue air quality measures across the city and £3m to complete the existing City of Culture city readiness programme.

2.2.4 In addition to these, the revenue reserve balances include £15m set aside as Funding For The Future approved within the recent Budget Report, £14m set aside as part of the Council's three long-term Private Finance Initiative models, £9m of Government Covid grant required to fund the financial impact of Covid in 2021/22, £9m set aside to fund costs arising from early retirement and redundancy decisions, £8m to provide protection against the potential future loss of Business Rates income and £4m of revenue to support future capital projects.

2.2.5 In line with recent practice, analysis of these balances will be undertaken as part of a wider exercise examining the Council's financial position in 2021/22 and going forward.

### 2.3 Capital Outturn

2.3.1 The capital outturn position for 2020/21 is shown in summary below and in greater detail in Appendix 2:

**Table 4: Capital Outturn Summary**

Final Budget £m	Final Spend £m	Net Rescheduling Now Reported £m	Under- spends £m	Total Variance £m
226.9	194.2	(32.5)	(0.2)	(32.7)

The quarter 3 monitoring report to Cabinet on 16<sup>th</sup> February 2021 approved a revised capital budget of £230.9m for 2020/21. Since then there has been a net programme decrease of c£4m giving a final budget for the year of £226.9m. Since February, a total of £32.5m net rescheduled spending has arisen within the capital programme. A scheme by scheme analysis is included in Appendix 2 and this is summarised in the table below.

**Table 5: Summary of Rescheduling**

Project	(Rescheduling) /Accelerated Spend £m	Explanations
Schools	(1.4)	This is primarily related to 3 live projects, due to delays in the tender process and access to site due to COVID pandemic has made it difficult to schedule in works.
ICT Programme	(0.4)	The rescheduling is largely in relation to projects not progressing as quickly as would have been expected primarily due to the impact of COVID both from a supplier point of view and capacity with them or from a Coventry City Council point of view in terms of shifting or changing priorities as a result of managing the pandemic
Sport and Leisure (alan Higgs and Indoor Bowls)	(0.4)	Alan Higgs £0.2m final retention payment due in 21/22 will see the end of the defects period and financial close. The indoor Bowls £0.2m has been delayed until September 21 due the completion of the leasing agreement
Whitley Depot Redevelopment	(0.8)	Update on cashflow to match the contractor predictions
UK Central & Connectivity	(5.7)	This covers two main element – Coventry South Package (CSP) and Coventry Very Light Rail (VLR). CSP while some slippage in year £3.5m the programme is still on target to complete in summer 2022. VLR has experienced delays in procurement due to COVID
City Centre South and Friargate	(3.0)	Some delays in the purchase of land and completion works has delay the City Centre South scheme; Friargate experiences some financial slippage with the JV shareholder and updated cashflow with the contractor for Building 2
Highways, Transport and Vehicles	(5.9)	Service Road treatments and Air Quality programme have been impacted by the restrictions due to COVID19 and government lockdown measures and factors outside the LA control. Swanswell Viaduct & Integrated Transport Block now on target to complete in September 2021.
Coventry Station Masterplan	(1.2)	The Network Rail fees for NUCKLE 1.2 have slipped in 2021/22 as the Council are awaiting the signed contract from Network Rail to enable invoicing to commence. Wider changes to the programme of the main works are now slipping into 2021/22 from originally planned
Getting Building Fund – 3 <sup>rd</sup> Party Projects	(1.7)	The projects within this programme have all been impacted by delays, primarily due to the pandemic, and initial financial forecasts which were set in early 2020/21
Acquisition Costs Temporary	(0.5)	Plans to purchase potential supported temporary accommodation in 2019/20 and 2020/21 did not go ahead as planned and a phase 3 programme is currently being drafted for future use of funds

Accommodation (Homeless)		
Battery Plant and Equipment	(3.3)	There have been delays in completion of the project due to the Covid-19 pandemic.
City of Culture	(1.9)	There have been a few delays due to the combination of COVID and Brexit which has meant some rescheduling of £3.1m, netted off by the inclusion of the acquisition of the Collection Centre in 2020/21 of £1.2m
Public Realm Phase 5 – City of Culture	(5.4)	The programme was effected by COVID 19 and lockdown measures, meaning that scheme completion has slipped into the first quarter of 2021-22.
Other	(1.0)	Smaller schemes
TOTAL	(32.5)	

**Table 6: Over and Underspends in the Capital Programme**

Project	Over/ (Under)spend	Explanations
Loop Line	(0.2)	Approval to award a loan facility in September 2018 has not been taken up.
Total	(0.2)	

2.3.2 The 2020/21 programme continued to maintain a significant investment in the city's transport and public infrastructure, its preparations for the City of Culture year, schemes demonstrating an increasing engagement with environmental initiatives and a range of other projects showing the Council's desire to make Coventry an attractive place to live, work and do business:

- £37m has been spent on transport and highways infrastructure across a range of both major and minor schemes. These included Whitley South infrastructure to support a proposed research and development campus and adjoining small and medium sized enterprises, works to advance the A46 link road, further research and development investment in Very Light Rail and schemes to improve and maintain the city's highways via the highways investment and Integrated Transport Block programmes.
- A further £32m has been invested in UK Battery Industrialisation Centre (UKBIC) in 2020/21 with a £18m loan from the WMCA having been drawn down in the year alongside the grant from Innovate UK which is funding the majority of the project. This new research facility on the outskirts of Coventry will play a key national role in the emerging battery industry and is now due to open shortly having suffered delay due to COVID19.
- Further programme spend of £30m has been made in 2020/21 on the Coventry Station Masterplan Plan which is fundamentally remodelling Coventry Rail Station. The new facilities have taken clear physical form over the course of the year and are due to become operational by December 2021.

- Public Realm works amounting to nearly £24m have been undertaken across the city centre which has been substantially remodelled to coincide with the City of Culture celebrations. These works have continued into the new financial year with most areas now being completed or approaching completion.
- There have been works totalling £17m across the schools property estate as part of the One Coventry Strategic Plan. There is an increasing focus now on providing additional capacity in secondary schools across the city to meet the growing numbers amongst the secondary intake.
- City of Culture capital programme spend of £15m has occurred in the year updating a range of Coventry's cultural capital assets, building a legacy for the city following the City of Culture year.
- External grants have been utilised to allow nearly £10m across a range of greener travel options including the cycle schemes, clean bus and electric vehicle technology and charging points.
- A range of smaller scale but significant schemes have advanced including the redevelopment of Whitley Depot and the initial development expenditure for the Material Recycling Facility which will begin emerge in the form of Sherbourne Recycling Limited in 2021/22.

2.3.3 The funding in respect of this capital expenditure of £194.2m is summarised in Table 7 below  
The Programme has been resourced c80% from capital grants.

**Table 7: Capital Funding**

	Funding the Programme £m	Available Resources £m	Resources Carried Forward £m
Prudential Borrowing	24.4	24.4	0
Grants and Other Contributions	155.1	174.8	(19.7)
Revenue Contributions	5.3	5.3	0
Capital Receipts	7.4	32.1	(24.7)
Capital of Management Reserve	1.8	5.8	(4.0)
Private Finance Initiative (PFI)	0.2	0.2	0
<b>Total Resourcing</b>	<b>194.2</b>	<b>242.6</b>	<b>48.4</b>

## 2.4 Treasury Management Activity

2.4.1 The Base Interest Rate was maintained at 0.10% by the Bank of England throughout 2020/21. The medium-term outlook is increasingly weak. Whilst the strict initial lockdown measures put in place to protect against COVID-19 were eased, the second wave of infections over Winter 2020 prompted more restrictive measures on a regional and national basis. The current forecasts predict the base rate will remain at 0.10% until at least the first quarter of 2024.

## **Long Term (Capital) Borrowing**

The Public Works Loan Board (PWLB) is the main source of loan finance for funding local authority capital investment. In November 2020 the rules governing local authority access to PWLB changed, as interest rates were reduced by 1%, making PWLB more competitive than was previously the case. However, with some limited exceptions, PWLB loans are no longer available to local authorities that plan to buy investment assets primarily for yield, such as property purchased for a financial return, where they are not clearly serving some other significant service objective. The restrictions apply even if an authority doesn't plan to fund the investment by borrowing and decides to use other resources, such as capital receipts. Under the Treasury Management Strategy 2021/22 approved by Cabinet on 23 February 2021 it was agreed the Council will not buy investment assets primarily for yield.

Taking into account the 1% reduction in PWLB rates referred to above, interest rates for local authority borrowing from the Public Works Loan Board (PWLB) for 2020/21 have varied within the following ranges:

**Table 8: PWLB Interest Rates**

<b>PWLB Loan Duration (standard rates)</b>	<b>Minimum in 2020/21</b>	<b>Maximum in 2020/21</b>	<b>Average in 2020/21</b>
5 year	0.92%	2.19%	1.70%
20 year	1.67%	3.00%	2.47%
50 year	1.52%	2.91%	2.34%

With short-term interest rates remaining much lower than long-term rates, it has been more cost effective in the short-term to either use internal resources or to use short-term borrowing instead. By doing so, the Council has reduced net borrowing costs (despite foregone investment income) and reduced overall treasury risk.

2.4.2 At outturn, the Capital Financing Requirement (CFR), which indicates the Council's underlying need to borrow for capital purposes, has increased by £9.6m:-

**Table 9: 2021/22 Capital Financing Requirement (CFR)**

	<b>£m</b>
Capital Financing Requirement at 1 <sup>st</sup> April 2020	493.6
Borrowing required to finance 2020/21 Capital Programme	24.4
PFI & Finance Leases liabilities	(2.4)
Donated Assets	0.0
Provision to Repay Debt (Minimum Revenue Provision)	(10.9)
Provision to Repay Debt (Capital Receipts Set Aside)	0.0
Repayment of Transferred Debt	(1.5)
Reduction of Provision and other restatements	0.0
Capital Financing Requirement at 1 <sup>st</sup> April 2021	<b>503.2</b>

During 2020/21 the Council undertook £18m of borrowing from the West Midlands Combined Authority (WMCA) as part of the funding package of the UK Battery Innovation Centre. The Council has no immediate plans to take any further new long-term borrowing, however, this will be kept under review. Within 2020/21, the movements in long-term borrowing and other liabilities were:-

**Table 10: Long Term Liabilities (debt outstanding)**

Source of Borrowing	Balance at 31st March 2020 £m	Repaid in Year £m	Raised in Year £m	Balance at 31st March 2021 £m
PWLB	190.4	0	0	190.4
Money Market	38.0	0	0	38.0
Stock Issue	12.0	0	0	12.0
West Midlands Combined Authority	0.0	0	18.0	18.0
Other	0.4	0	0	0.4
<b>sub total ~ long term borrowing</b>	<b>240.8</b>	<b>0</b>	<b>18.0</b>	<b>258.8</b>
Other Local Authority Debt	11.7	(1.6)	0	10.1
PFI & Finance Leasing Liabilities	65.2	(2.4)	0	62.8
<b>Total</b>	<b>317.7</b>	<b>(4.0)</b>	<b>18.0</b>	<b>331.7</b>

This long term borrowing is repayable over the following periods:-

**Table 11: Long Term Borrowing Maturity Profile (excluding PFI & transferred debt)**

Period	Long Term Borrowing £m
Under 12 Months	10.4
1 – 2 years	12.7
2 – 5 years	43.0
5 – 10 years	9.0
Over 10 years	183.7
<b>Total</b>	<b>258.8</b>

In line with CIPFA Treasury Management Code requirements, Lenders Option, Borrowers Option Loans (LOBOs) with banks are included in the maturity profile based on the earliest date on which the lender can require repayment. The Council has £38m of such loans, £10m of which the lender can effectively require to be paid at annual intervals, and £28m at 5 yearly intervals.

### **Short-Term Borrowing and Investments**

2.4.3 The Treasury Management Team acts on a daily basis to manage the City Council's day to day cash-flow, by borrowing or investing for short periods. By holding short term investments,

such as money in call accounts, authorities help ensure that they have an adequate source of liquid funds. A total of £89.0m of short-term borrowing was taken out during the year at an average interest rate of 0.86%, with £54m still outstanding at 31<sup>st</sup> March 2021. This borrowing was all taken out with other local authorities and was primarily required to facilitate an upfront payment of pension contributions at £97.8m. It was also used to manage short term cash flow shortages throughout the financial year. During the year the Council held significant short-term investments, as set out in Table 11. The average short-term investment rate in 2020/21 was 1%.

**Table 12: In House Investments at 31st March 2021**

	<b>At 30<sup>th</sup> June 2020 £m</b>	<b>At 30<sup>th</sup> Sept 2020 £m</b>	<b>At 31<sup>st</sup> Dec 2020 £m</b>	<b>At 31<sup>st</sup> Mar 2021 £m</b>
Banks and Building Societies	0.0	0.0	0.0	0.0
Local Authorities	0.0	5.0	5.0	0.0
Money Market Funds	37.0	67.8	35.0	15.0
Corporate Bonds	0.0	0.0	0.0	0.0
Registered Providers	10.0	10.0	10.0	10.0
<b>Total</b>	<b>47.0</b>	<b>82.8</b>	<b>50.0</b>	<b>25.0</b>

### **Pooled Investments**

In addition to the above in-house investments, a mix of Collective Investment Schemes or “pooled funds” is used, where investment is in the form of sterling fund units and not specific individual investments with financial institutions or organisations. These funds are highly liquid, as cash can be withdrawn within two to four days, and short average duration of the intrinsic investments. These investments include Certificates of Deposits, Commercial Paper, Corporate Bonds, Floating Rate Notes, Call Account Deposits, Property and Equities. However, they are designed to be held for longer durations allowing any short term fluctuations in return due to volatility to be smoothed out.

In order to manage credit risk these investments are spread across a number of funds as highlighted in the table below:

**Table 13: External, Pooled Investments as at 31<sup>st</sup> March 2021**

	<b>Date Invested</b>	<b>Cost £m</b>	<b>Value £m</b>	<b>Annualised Return from Investment %</b>
CCLA LAMIT Property Fund	Nov 2013	12.0	12.05	4.67%
M&G Optimal Income Fund	Aug 2018	1.5	1.54	2.93%
M&G Strategic Corporate Bond Fund	Aug 2018	3.0	3.09	3.44%
M&G UK Income Distribution Fund	Aug 2018	3.0	2.75	4.27%
Investec Diversified Income Fund	Aug 2018	4.5	4.45	3.93%
Schroder Income Maximiser	Aug 2018	4.5	3.42	6.13%

Threadneedle Strategic Bond Fund	Aug 2018	1.5	1.59	2.75%
<b>Total</b>		<b>30.0</b>	<b>28.89</b>	<b>4.52%</b>

Credit risk remains central to local authority investment management and the Council's risk is managed in line with the Treasury Management Strategy, approved by Cabinet as part of the budget setting report at the meeting of 23 February 2021. Central to this is the assessment of credit quality based on a number of factors including credit ratings, credit default swaps (insurance cost) and sovereign support mechanisms. Limits are set to manage exposure to individual institutions or groups. Credit ratings are obtained and monitored by the Council's treasury advisors, Arlingclose. Whilst the fears of systemic banking failures may have receded, the development of "bail-in" make it almost certain that unsecured and corporate investors would suffer losses in the event of a bank default.

In 2020/21, the pooled investments saw a recovery in value following an initial sharp drop felt at the end of 2019/20 due to the Covid pandemic. As at 31<sup>st</sup> March 2021 the accumulated deficit on these pooled funds is £1.1m (£3.2m at the end of 2019/20). There remains an expectation that the full value will be recovered over the medium term - the period over which this type of investment should always be managed. Current accounting rules allow these 'losses' to be held on the Council's balance sheet and not counted as a revenue loss although this is due to change in April 2023. These investments will continue to be monitored closely. The annualised return %s shown in the table above refer to an income return from the date of the initial investment that has continued to be received from these investments despite the drop in capital value.

### **Summary Prudential Indicators**

2.4.4 The Local Government Act 2003 and associated CIPFA Prudential and Treasury Management Codes set the framework for the local government capital finance system. Authorities are able to borrow whatever sums they see fit to support their capital programmes, subject to them being able to afford the revenue costs. The framework requires that authorities set and monitor against a number of prudential and treasury indicators relating to capital, treasury management and revenue issues. These indicators are designed to ensure that borrowing entered into for capital purposes was affordable, sustainable and prudent. The purpose of the indicators is to support decision making and financial management, rather than illustrate comparative performance.

The indicators, together with explanatory notes and the relevant figures are included in **Appendix 3**. This highlights that the Council's activities are within the amounts set as Performance Indicators for 2020/21. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 31<sup>st</sup> March 2021 the value is -£47.8m (minus) compared to +£87.9m 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 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at fixed interest rates. At 31<sup>st</sup> March 2021 the value is £292.3m compared to £439.5m within the Treasury Management Strategy, reflecting that a significant proportion of the Council's investment balance is at a fixed interest rate.

#### 2.4.5 Commercial Investment Strategy

The Council's Commercial Investment strategy is designed to ensure there are strong risk management arrangements and that the level of commercial investments held in the form of shares, commercial property and loans to external organisations, is proportionate to the size of the Council. In doing this the strategy includes specific limits for the total cumulative investment through loans and shares.

During 2020/21 commercial investment through the Council's capital programme was limited to property investment within the city totalling £1.6m.

As at the end of 2020/21, the council had cumulatively invested £86m in commercial assets against a total limit of £103m. Within this, £34.4m has been invested as loans (2020/21 strategy limit £53m) and £51.6m as shares (2020/21 strategy limit £50m). The amount invested in shares is higher than the limit due to the reclassification of the Council's £18m loan to UKBIC as a soft-loan (provided at below market rate). Accounting requirements result in part of this amount being treated as an investment in shares rather than a loan and this has resulted in the level of loans exceeding limit approved within the Council's Commercial Investment Strategy (CIS). There are no other implications of this set of circumstances and in all other respects the Council's commercial investments reflect the position anticipated when the Strategy was set in February. The Council's CIS will be reviewed and reported on as part of 2021/22 in year monitoring.

The Council's investment in commercial assets is proportionate, with commercial income totalling £19.6m in 2020/21 (equivalent to c2.5% of the Council's gross spend in 2020/21) and commercial assets valued at £403m (24% of the Council's total asset base of c£1,662m). The level of commercial income was lower than in 2019/20 (£22.2m) due in the main to the impact of the pandemic on share dividends received.

### **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 the Director of Law and Governance**

5.1 Financial implications

The final revenue outturn picture for 2020/21 is balanced after proposed year-end contributions of £9m to reserve balances. Whilst this is a fundamentally favourable financial outturn position this must be set in the context of a unique set of circumstances which have been present through the year.

The continuing Covid-19 crisis has had a profound effect and continues to set the tone for the Council's financial approach. One measure of the societal and financial impact of Covid is that Government reliefs and grant funding to the city and the Council now exceed the level that would represent a whole year's net budget figure for the Council. Although in-year unring-fenced grant funding to cover the costs and income loss attributable to Covid has been assessed as falling short by £2m further funding exists in the form of Covid reserve balances set aside in 2019/20 and new grant funding announced for 2021/22. A good deal of activity and the uncertainty remain but within reasonable parameters it is estimated that

overall Government funding levels will be of a similar order of magnitude to the financial impact on the Council.

Through this period the Council has had to assess the wider Covid impact on the city and the need to support its citizens in a robust and proportionate manner. A self-assessed view is that the Council has done this prudently, targeting support at the areas that most need it and taking care not to commit resources in an unsustainable way. This has enabled a balance of resources to be maintained to provide the Council with a sound financial footing as it enters 2021/22 and during a period when the pandemic is once again seeing rising cases despite widespread vaccination coverage. Care has been taken to use maximum flexibility to best match specific Covid grants funding streams to costs incurred locally. This has minimised the amount that has been subject to claw-back and enabled more general grant resources to be held back as a flexible resource for future use.

The Council has sought to maintain a strong financial planning approach which has taken account of the risk of volatility across a range of budgets such as those in Children's and Housing services. Demand pressures have caused large financial overspends in these areas across recent years. For both areas there has been an assessment that Covid has been the cause of expenditure incurred in the year which has been offset by grant. In addition, non-Covid temporary accommodation costs appear to have been substantially reduced this year due in part to the accommodation options put in place by the Council. The degree to which it is possible to safely manage down demand in these services in post-Covid conditions will be fundamental to the Council's financial performance in 2021/22.

Several corporate budgets such as superannuation and the Coventry and Warwickshire Business Rates Pool yield can be subject to volatility and were budgeted for on a prudent basis in 2020/21. Both areas have resulted in an outturn position towards the favourable end of the range of reasonable expected outcomes which has contributed considerably to the overall bottom line position. Each of these favourable financial outturns have occurred in areas that have been subject to affirmative Council decisions in recent years. The underspends in corporate budgets relate to areas that are difficult to predict and to some extent are one-off in nature although it is likely that there may be some areas where budgetary flexibility can be identified as part of 2022/23 budget preparations.

The financial outturn and the contributions to reserves at year-end cannot disguise the fact that the Council faces some significant financial challenges ahead. It is clear that the direct effects of Covid will remain for a significant proportion of 2021/22 affecting areas such as the number of looked after children, car park income, Business Rates and property rental income. There remains a strong possibility that at least part of the financial impact will remain when the wider pandemic subsides and may become part of the structural fabric of the Council's financial position. The starting position for the Council's 2022/23 Budget is a gap of £17m ahead of the Government Spending Review due later this year which does not hold out much hope of a favourable local government settlement.

Setting aside the extra-ordinary Covid related Business Rates adjustment the wider increase in reserve balances is a significant element within the outturn position. What is clear when scanning the wider local government landscape however is the degree of risk built into local government finances. There have been a number of high profile financial failures often linked to ambitious local plans with scope to deliver financial returns. Given that the Council is itself involved in a range of commercial ventures, company structures and external loan financing arrangements there is good reason to ensure that the Council maintains a high degree of self-awareness of its position. High standards of due diligence, good governance and monitoring arrangements and the maintenance of a broad range of activities to guard against a concentration of risk are all vital factors to protect the Council's financial position. Further

though, it is important for the Council to maintain contingency balances to protect against the risk of financial failure in one or more key areas.

The overall level of reserve balances is distorted by the Covid related Business Rates reserve which reflects an unprecedented set of circumstances. Other than this the increase in Council revenue reserves includes temporary funding reflecting the timing of specific schemes or grant funding ahead of the need to spend. With the exception of the Council's General Fund balance all reserves have been set aside to deliver specific projects or risks. Given the size of the Council's ambitions defined by its Capital Programme, its transformation programme and its financial involvements that extend beyond traditional local authority service provision it is entirely appropriate for the Council to support this in the form of balances to pump prime such areas and provide some financial risk mitigation. Nevertheless, the Council remains firmly within a 'mid-table' position with the most recent CIPFA Resilience Index indicating that the Council remained just in the bottom of half of metropolitan district councils in relation to the level of its reserve balances. Insofar as the Council has been able to place itself in a strong financial position it is worth emphasising that rather than being a matter of internal concern only, these circumstances provide the best basis for the Council to improve services for residents and invest in the city and its communities.

The level of expenditure across a broad number and type of capital schemes has once again demonstrated the Council's appetite to embark on ambitious and innovative projects and its success in attracting grant funding to do this. The second largest programme of spend within the modern era (following 2019/20) has been 80% funded from external grant. The programme's coverage of projects affecting the city centre skyline, enhancing transport infrastructure, improving the profile of the city and providing support to local economic development continues to be a key part of the Council's approach. This is being carried out alongside the City of Culture year as part of a continuing approach to make the city more attractive to investors and visitors, to increase the provision of jobs locally and improve the economic well-being of citizens.

Although the Council has undertaken some borrowing to fund its capital expenditure this has been undertaken on a short-term basis at this stage, taking advantage of relatively low interest rates available from other local authorities. In other areas the Council continues to undertake prudent treasury activity and pursue commercial activity that is ambitious but proportionate to the size of its asset base and overall budget.

Reflecting the approach outlined above, reserve contributions are proposed within this report to help ensure the Council's financial sustainability, enable the city's recovery from Covid and continue to focus on the Council's priorities. The contributions will balance the Council's overall financial position to budget for 2020/21. It is proposed that £3m is set aside to protect against shocks from Council involvement in external arrangements (loans, regeneration development and key partner support), £1m made available to manage workforce pay and grading issues and the remaining £5.2m will provide for key policy priority areas which are likely to be identified as plans progress through 2021/22.

## 5.2 Legal implications

There are no specific legal implications in relation to this report.

## 6. Other implications

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

This report provides an account of the overall financial performance of the Council compared with its original Budget. The Council also monitors the quality and level of service provided to the citizens of Coventry and the key objectives of the Council Plan. This includes monitoring against the objective of delivering our priorities 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 to managing this risk and this report is a key part of the process.

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

The revenue and capital outturn position reported here demonstrates that the Council continues to undertake sound overall financial management. This will continue to be very important in the light of the uncertainty being faced with regard to the level of funding available to local government over the next few years and the immediate impact and aftermath of the Covid-19 situation.

**6.4 Equalities / EIA**

No specific impact

**6.5 Implications for (or impact on) Climate Change and the Environment**

None

**6.6 Implications for partner organisations?**

None

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## Appendix 1 Revenue Variations

Appendix 1 details directorate forecast variances.

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

	Revised Net Budget	Forecast Spend	Centralised Forecast Variance	Budget Holder Forecast Variance	Total Forecast Variance	Less Covid Impact	Net Forecast Variance
	£m	£m	£m	£m	£m	£m	£m
Adult Social Care	79.0	79.9	0.0	0.9	0.9	0.9	<b>0.0</b>
Business Investment & Culture	7.2	8.9	0.2	1.4	1.6	1.4	<b>0.2</b>
Children & Young People's Services	71.1	76.8	(2.0)	7.7	5.7	5.4	<b>0.2</b>
Contingency & Central Budgets	10.7	(23.7)	0.0	(34.4)	(34.4)	(25.9)	<b>(8.5)</b>
Education and Skills	15.2	14.7	(0.3)	(0.1)	(0.5)	(0.4)	<b>(0.1)</b>
Finance & Corporate Services	3.2	4.8	(0.0)	1.6	1.6	1.7	<b>(0.1)</b>
Housing & Transformation	14.6	14.1	0.0	(0.6)	(0.5)	3.0	<b>(3.5)</b>
Human Resources	1.3	1.3	0.0	0.0	0.0	0.1	<b>(0.1)</b>
Legal & Governance Services	3.6	4.8	0.1	1.2	1.2	0.7	<b>0.6</b>
Directorate Management	1.4	1.4	0.1	(0.1)	(0.0)	0.0	<b>0.0</b>
Project Management & Property Services	(4.6)	(2.4)	0.2	2.0	2.2	2.2	<b>0.0</b>
Public Health	2.6	2.6	0.1	(0.2)	(0.0)	0.0	<b>0.0</b>
Streetscene & Regulatory Services	29.1	36.2	0.1	7.0	7.1	7.6	<b>(0.5)</b>
Transportation & Highways	4.4	10.2	(0.0)	5.9	5.8	5.7	<b>0.2</b>
Bottom Line Covid Adjustment						(2.2)	<b>2.2</b>
<b>Total</b>	<b>238.8</b>	<b>229.5</b>	<b>(1.5)</b>	<b>(7.7)</b>	<b>(9.2)</b>	<b>(0.0)</b>	<b>(9.2)</b>

The figures in this table may be subject to small rounding differences to the main report and the rest of the appendix.

	<b>Centralised Variance Explanation</b>	<b>£m</b>
	These are underspends against a combination of salary budgets and turnover savings target. They result from vacancies across Council services although the level of vacancies has been reducing. Some of these vacancies will be covered from agency and overtime to ensure services can be maintained. These costs are included within the service positions described below.	(1.5)
<b>Total Centralised Variance</b>		<b>(1.5)</b>

### **Budget Holder Variance**

The Budget Holder variances explained below are reported excluding the impact of Covid. For example, Adult Social Care is reporting a net nil Budget Holder variance excluding the Covid impact

Service Area	Reporting Area	Explanation	£M
Public Health	Public Health - Insight	Variance due to Insight staff being transferred to support COVID response from the Covid 19 T&T Grant, and some Insight development projects and community engagement activities not going ahead due to Covid.	(0.2)
<b>Public Health</b>			<b>(0.2)</b>
Education and Skills	Employment & Adult Education	To date it has not been possible to deliver the outstanding £190k financial savings target set as part of previous budget setting processes to ensure we maximise grant funding against internal training programmes. Employment are showing a £265k budget holder over spend but this is fully offset by a centralised under spend.	0.5
Education and Skills	Other Variances Less than 100K		(0.2)
<b>Education and Skills</b>			<b>0.3</b>
Children and Young People's Services	Children's Services Management Team	£2.8m underspend due to COMF allocation towards COVID pressures within the service. Additional budget holder underspend within the Social Worker Academy due to a transfer of agency budget from Family Hubs to fund temporary increase in Academy posts (off-set by an overspend in the centralised variance)	(3.0)
Children and Young People's Services	Commissioning, QA and Performance	The non-Covid Budget Holder variance mainly relates to an overspend on agency staff who were covering vacancies across the service. This pressure has been exacerbated by higher numbers of children and their associated cases. This overspend was offset by underspends across centralised salary budgets. Recruitment continues to be a priority for Children's Services. Other variances include 1) £88k underspend in Safeguarding Boards, with fewer statutory reviews than usual in the year 2) £124k underspend on CAMHS linked to Covid impact on activity 3) Agency overspend of £58k in Professional Support Services in relation to three posts; two to grow the internal fostering provision and one for Throughcare. All three posts have now been filled permanently and the agency staff have left or are moving on shortly.	0.2
Children and Young People's Services	Help & Protection	There were two significant non-Covid Budget Holder variances in 2020/21. 1) Overspend on agency staff of £1.2m. This occurred as vacancies across the service needed to be covered. The overspend was offset by an underspend across centralised salary budgets, with recruitment a continuing priority for Children's Services 2) A	1.5

		£573k underspend across the Hubs which was mainly due to the transfer of Public Health grant of £408k to cover qualifying expenditure. Additionally, there were some smaller non-Covid Budget Holder variances including a £174k overspend on Section 17 client accommodation driven by increased activity and a £133k overspend on legal costs due to several high costs cases that occurred pre Covid.	
Children and Young People's Services	LAC & Care Leavers	The majority of the 'other budget holder variance' relates to placement costs. There was a pre-existing cost pressure on the unit cost of external placements identified at the start of 2020/21 which accounts for £1.3m of the overspend. Remands to custody as a consequence of youth violence are at the highest ever and there is a shortfall of £764k in the grant to offset this. Other pressures include the need to use agency staff (offset in part by an underspend in the centralised variance), the increase in support packages for disabled children, and the use of allowances to promote permanence outcomes for children. Finally, there has been an overall reduction of around £466k from the Q3 forecast; this was because LAC numbers did not increase by as much as anticipated following the ending of the January lockdown.	3.5
<b>Children and Young People's Services</b>			<b>2.2</b>
Adult Social Care	Strategic Commissioning (Adults)	£0.7m COVID-19 underspend relates to transport following the suspension of day opportunities earlier in the year and also ongoing reduced capacity as result of COVID-19. £0.2m other budget holder underspend relates to Carers budgets. Work is underway to continue to enhance the support offer to carers in 2021/22.	(0.2)
Adult Social Care	Adult Social Care Director	There are 2 significant variations which make up the budget holder variance. A £0.9m overspend due to specific COVID-19 related spend which will be resourced alongside other corporate covid related expenditure as well as a other budget holder £1.1m underspend representing the use of iBCF and other resources to manage the underlying Adult Social Care financial position.	(1.1)
Adult Social Care	All Age Disability and Mental Health Operational	There remains significant pressures in Deprivation of Liberty Assessment demand leading to additional assessment costs (£0.2m). The all Age Disability Team has also seen increasing demand alongside staff turnover. Ensuring statutory need is met has been essential and has resulted in additional agency cost.	0.3
Adult Social Care	Older People Community Purchasing	Demand for services continue to maintain consistent levels, which means overall spend is high. However a number of additional income streams have helped to ease budgetary pressures at the end of the financial year.	(1.4)
Adult Social Care	All Age Disability and Mental Health Community Purchasing	Demand for services continue to maintain consistent levels, which means overall spend is high. However a number of additional income streams have helped to ease budgetary pressures at the end of the financial year.	2.5
Adult Social Care	Other Variances Less than 100K		(0.1)
<b>Adult Social Care</b>			<b>0.0</b>

Housing & Transformation	Customer and Business Services	The impact of lockdown regulations and changes to ways of working has impacted on postage and printing needs across the Council resulting in reduced costs and a net loss of mainly internal income. This and some agency costs to cover vacant roles during reviews have been partially offset by some cost reduction actions by managers.	0.1
Housing & Transformation	ICT & Digital	There has been significant fluctuation in the demand on the ICT & Digital budget during 2020/21 as a result of the pandemic. We have seen a continued pressure on our traded income budget and a significant increase in demand for technology such as laptops and mobile phones. However, these pressures have been offset by reductions in costs and cost control measures implemented elsewhere within the budget. For example, suppliers have waived some charges or have given time limited cost reductions in other areas.	(0.2)
Housing & Transformation	Housing and Homelessness	The number of households living in temporary accommodation remains lower than anticipated with the evictions ban being extended. Additionally robust management processes in place for contracts/voids/preventions and move-ons have all had a positive impact	(3.4)
<b>Housing &amp; Transformation</b>			<b>(3.5)</b>
<b>Human Resources</b>	<b>Other Variances Less than 100K</b>		<b>(0.2)</b>
<b>Service Area</b>	<b>Reporting Area</b>	<b>Explanation</b>	<b>£M</b>
Finance & Corporate Services	Revenues and Benefits	COVID-19 has resulted in a significant reduction in court cost income of around £1m due to the suspension of liability order applications and an estimated impact on the recovery of Housing Benefit subsidy overpayments c£650k. Other variations are due to an increase in the unit cost of supported exempt accommodation for which the Council only receives partial Housing Benefit subsidy if the provider is not a registered social landlord.	0.2
Finance & Corporate Services	Financial Mgt	Additional income generated from support to projects (c£75k) and one-off savings (c£60k)	(0.2)
Finance & Corporate Services	Other Variances Less than 100K		(0.1)
<b>Finance &amp; Corporate Services</b>			<b>(0.1)</b>
Legal & Governance Services	Legal Services	The COVID-19 lockdown and related restrictions have had a negative impact on income streams within the Register Office c£0.3m. Additionally, the pandemic has necessitated additional legal agency staff and external legal fees for care proceedings at a cost of £0.32m. Other variations reflect a £250k cost of agency staff to cover vacancies within the Legal Services team, an underlying c£200k cost of external legal fees for care proceedings, and an underlying pressure of £100k in the Coroner's Service as a result of increased costs and volumes.	0.6
Legal & Governance Services	Democratic Services	Underspend as a result of COVID-19 restrictions and lockdown which prevented mayoral events and hospitality from taking place.	(0.1)

<b>Legal &amp; Governance Services</b>			<b>0.5</b>
Transportation & Highways	Highways	This is primarily the impact of DLO being stood down from April to June 2020 due to Covid 19 meaning that the service was unable to recover c£0.3m of its costs and overheads.  This was offset by fees earned on external works in the latter part of the year.	(0.1)
Transportation & Highways	Traffic	The majority of pressures (c£5.3m) are due to a significant reduction in parking and enforcement income during the COVID-19 lockdown periods and the rest of the financial year.  Other variations include the delayed implementation of a new fee structure for residents' parking permits, additional resource requirement in the highways development team, offset by a higher volume of streetwork permit fees.	0.2
Transportation & Highways	Other Variances Less than 100K		0.1
<b>Transportation &amp; Highways</b>			<b>0.2</b>
Streetscene & Regulatory Services	Streetpride & Parks	Various spend pressures relating to Tree Inspections c£50k, Fleet Costs c£150k, depot costs c£80k and traveller incursions c£94k have been offset by higher net income of £336k primarily in respect of Bereavement services and car parking at Coombe Park	0.1
Streetscene & Regulatory Services	Waste & Fleet Services	This surplus primarily relates to higher income and reduced costs in Commercial waste of £890k, together with one off savings in fleet of £269k for vehicle disposals, and £390k for reduced capital financing costs, offset by costs associated with Christmas Waste Collections c£150k and higher waste Disposal cost of £500k.	(0.8)
Streetscene & Regulatory Services	Other Variances Less than 100K		0.1
<b>Streetscene &amp; Regulatory Services</b>			<b>(0.6)</b>
Project Management and Property Services	Commercial Property and Development	This small surplus represents one-off in year income from tenants for dilapidations and similar payments	(0.2)
Project Management and Property Services	Facilities & Property Services	This surplus reflects the positive trading surplus in both the R&M and compliance functions, offset by the void costs of holding the former sports building at Fairfax street	(0.5)
Project Management and Property Services	PMPS Management & Support	This deficit reflects the under achievement of the MTFS property acquisition target due to the PWLB rule change to prevent borrowing to fund yield generating commercial property	0.5
<b>Project Management and Property Services</b>			<b>(0.2)</b>
Contingency & Central Budgets	Corporate Finance	The underspend incorporates £3.8m lower than forecast superannuation costs payable to the West	(8.5)

		Midlands Pension Fund flowing from the Council's up-front payment of contributions covering 2020/21 to 2022/23. The Coventry and Warwickshire Business Rates Pool reflects income above budget of £1.6 as a result of reported Business Rates levels across Coventry and Warwickshire. The net Asset Management Revenue Account position is an underspend of £3.0m and includes includes higher than budgeted interest income on the Council's investments and lower than budgeted borrowing interest costs.	
<b>Total Budget Holder Forecast Variances - Contingency &amp; Central Budgets</b>			<b>8.5</b>

## Appendix 2 Capital Programme Change and Analysis of Rescheduling

SCHEME	APPROVED CHANGES £m	(RESCHEDULING ) / ACCELERATED SPEND £m	(UNDERSPEND ) / OVERSPEND £m	EXPLANATION
Coventry South Package	(3.6)	(3.5)		<p>Having completed the main works compound, installed boundary fencing and tree protection fencing, earthworks have commenced on the A46 N/B on slip and the S/B off slip roads, as part of construction phase 1 of the works.</p> <p>Liaison work continues to ensure the scheme traffic management is co-ordinated with other planned works in the area by, in particular, HS2 and Highways England.</p> <p>Works still remain programmed to complete in summer 2022 (an 18 month construction period) but a decision to locate a COVID-19 mass vaccination centre at nearby Stoneleigh Park has presented challenges through the requirement to keep key access routes to the vaccination centre clear. This has effected programme and spend to date, hence the slippage.</p> <p>The £3.6 approved change is because the the Tile Hill car park expansion is now being delivered by TfWM and CCC will no longer be the accountable body."</p>
Coventry Very Light Rail	0.4	(2.2)		Delays in the procurement staff shortage at DMBC due to COVID which led to some items being procured later than planned and not receiving invoices in time from DMBC to claim for GBF funds.
City Centre South		(1.8)		Delays in the purchase of land and the completion works at Coventry Point demolition includes costs for tarmac and fees to be completed in 2021/22
Friargate		(1.2)		£750k of the slippage is the payment that the Council is required to pay to the JV as Shareholder. This payment was not required during 2020/21, however it has now become due and will mainly fund infrastructure works. The remaining £450k variance is as a result of a variance to the profile of spend on Two Friargate and more accurate forecasting following appointment of the contractor.
Highways Investment		(1.8)		There were 5 surface treatment schemes, 2 footway improvement schemes and 2 verges schemes that were not able to be delivered because of restrictions due to COVID19 and government lockdown measures. Flood alleviation works at Allesley and Broad Lane has slipped, due to programme delays from the

				Environmental Agency. Value for money was achieved on delivery of the Challenge fund footway programme by using our framework contractors, resulting in scheme outturn costs coming in less than initially anticipated.
Swanswell Viaduct Phase 2		(0.5)		Contract started February 2021 and will run to September 2021. All budget will be expended in the 2021/22 financial year.
Integrated Transport Block Programme		(1.7)		The proposed safety scheme for Old Church Road was delayed. However, consultation has now been undertaken, this finished on 5th March and the scheme will be constructed 2021/22. UTMC rescheduling has occurred as a result of the KRN works programme running over 18 months due to complete in September as agreed with TfWM
Getting Building Fund		(1.7)		The projects in the Getting Building Fund (GBF) programme have all been impacted by delays, primarily due to the pandemic, and initial financial forecasts which were set in early 2020/21 have been revised with the majority of spend taking place in the 2021/22 FY. All projects remain on track to complete spend by 31 March 2022 in line with the close of the GBF grant programme.
Public Realm Phase 5 - City of Culture	0.2	(5.4)		The programme was effected by COVID 19 and lockdown measures, meaning that scheme completion has slipped into the first quarter of 2021-22.
Clean Bus Technology, Better Streets Community and Binley Cycle Scheme		(1.6)		An improved price was achieved for the retrofit of buses than originally budgeted. The remaining grant will be slipped into next year as it is anticipated that there will be further bus retrofits.
Air Quality		(0.3)		There was a slight delay due to COVID 19 that impacted Coundon Cycleway, but the scheme is now back on programme with completion planned for summer 2021. A final Full Business Case is still awaiting a decision from Government that has led to slippage of spend into next year.
Coventry Station Masterplan		(1.2)		The variance between Q3 and Q4 can be attributed to a number of factors. Firstly a delay in Network Rail fees being issued for the period and the original estimates for Project Management fees coming in less than original forecast for Q4. Secondly there is some variance in relation to forecast costs for construction activities for the Footbridge, Multi-Storey Car Park & Secondary Entrance and highways works as a result of changes to programme resulting in some activities now falling into

				2021/22. The substation costs have increased to reflect project changes and agreed compensation events. The Network Rail fees for NUCKLE 1.2 have slipped into 2021/22 as the Council are awaiting the signed contract from Network Rail to enable invoicing to commence. Finally the existing station programme cost profile has been adjusted to reflect the delivery programme being refined to align with the contract the Council has entered into with Avanti who will be delivering the works.
Whitley Depot Redevelopmnet		(0.6)		Predicted cashflow amended to match actual contractor cashflow. This is due to high value items on the non-critical path being agreed at later date than originally programmed.
Whitley Depot ICT Hub		(0.2)		The rescheduling on this scheme is in relation to the delays encountered with our new Data Centre facility being handed over by the provider – this should be complete within the first half of this financial year
Homelessness		(0.5)		Plans to purchase potential supported temporary accommodation in 2019/20 and 2020/21 did not go ahead as planned and a phase 3 programme is currently beign drafted for future use of funds
Battery Plant and Equipment		(3.3)		There have been delays in completion of the project due to the Covid-19 pandemic. Commissioning of equipment has taken longer than planned because of travel restrictions preventing engineers from overseas suppliers travelling to the site to support the UKBIC team. Final payments on equipment cannot be made until commissioning is complete. The UKBIC Team is working hard to complete the commissioning of all equipment and complete the site and it is hoped that this will be completed later this year
UK City of Culture	0.2	(3.1)		The Cultural Capital Investment Programme is progressing well and the majority of projects on track. However, there have been a few delays due to Covid and supply issues. The Programme Team are confident that these have now been resolved.
UK City of Culture - Collection Centre		1.2		Cabinet Approval on 23rd February 2021 - the acquisiotion of the IKEA premises and adjoining land for the national collection centre has incurred costs in advance of budget setting for 2021/22.
Disabled Facilities Grant		(0.4)		Underspend due to slippage of various adaptation and building schemes primarily due to Covid-19 issues causing slowdown in activity throughout the year.

Basic Need	0.4	(1.6)		This is primarily related to 3 live projects. Tender award delays have pushed the cash flow projection back by 1 – 2 months which moved the value across into 2021/22 from 2020/21. Essential concrete works and structural repairs has resulted in a delay on site to define works required and as such delayed further activity/spend as one project.
Condition		(0.3)		Accessibility to works on live sites during Covid pandemic has meant some works have been more difficult to schedule in. This has resulted in works having to be delayed, and spend has been slipped.
SEND		0.4		Work has been undertaken quicker than anticipated causing spend to be accelerated. Projects completed on time and within budget.
Running Track Warwick University	0.2			Approved for funding in 2018 for 40% contribution towards the running track at Westwood Campus - Warwick University
Alan Higgs Centre - 50m Swimming Pool		(0.2)		A sum of just over £207k needs rescheduling into 2021/2022 to fund the final retention payment o/s (linked to the closing out of the final defects with the Contractor) and to cover the costs of some works currently being finalised
Re-provision of Coventry's Indoor Bowls Facility		(0.2)		The project start date has been rescheduled to September 2021 due to delays with agreeing the lease to start construction with the Avenue Bowls Club and then subsequent delays due to birds nesting in vegetation that needs to be removed prior to starting construction which will only be possible once the birds nests become inactive.
Loop Line			(0.2)	Facility not taken up
Multi Recycling Facility Development Costs	(0.4)			Technical change to realign budget

Whitley South Infrastructure	(2.8)			Technical adjustment to funding to match spend
Ernest Jones	0.6			Cabinet approval on 1st December 2020, for the surrender of the lease on the premises in Upper Precinct, in order to implement phase two of the public realm scheme.
ICT		(0.4)		The rescheduling is largely in relation to projects not progressing as quickly as would have been expected primarily due to the impact of COVID both from a supplier point of view and capacity with them or from a Coventry City Council point of view in terms of shifting or changing priorities as a result of managing the pandemic.
Purchase of Containers - Commercial Waste		(0.3)		Essentially lack of new business, and loss of existing business meant we didn't need to purchase as many containers as forecast resulting in lower spend.
Active Travel		(0.2)		Active travel phase 1 has been successfully delivered, phase 2 has now commenced with the remainder of the programme to be now delivered in the next financial year.
Green Homes Grant		(0.2)		Green Homes Grant Local Authority Delivery Phase 1A grant funding was not spent in 2020/21 and moved into 2021/22 due to our delivery partner, Act on Energy, being unable to install energy efficiency measures in homes because of Covid-19. Government lockdown restrictions meant contractors were unable to visit people's homes to install measures and Act on Energy were unable to complete the required eligibility checks. The pandemic also meant residents did not want additional people in their homes resulting in low interest in the scheme. With the recent easing of lockdown restrictions and increasing resident confidence, Act on Energy have now been able to start installing measures for this scheme.
ESIF - Low Carbon		(0.1)		Due to the ongoing pandemic, businesses are not currently able to invest in the low carbon technologies & project which Green Business Grant would support, therefore demand for grants have been less than anticipated. The programme is confident that the demand will increase and we will work to support businesses when they are able to invest again.

Interest Capitalisation	1.6			This is in respect to the accounting policy referring to the prudential borrowing costs associated with schemes: Whitley South and Coventry Station Masterplan. Borrowing costs, in the form of interest expenses, are capitalised where the asset in question is a qualifying asset and takes a substantial period of time to bring into operation. Borrowing costs will only be capitalised on schemes for which expenditure is incurred over a period or more than 12 months, until the asset is operationally complete, and where a material level of capital expenditure is resourced by borrowing.
Growing Places		0.9		The Capital Development works and creation of a Commonwealth Convention Centre at the Ricoh Arena, funded by Local Growth Fund, Growing Places and Getting Building Fund, began in Autumn 2020. Due to an accelerated programme and completion of a new Sports Bar the project was able to draw down the full GP allocation in 2020/21.
Net movement of schemes below <£100k	(0.8)	(0.9)		
<b>TOTAL CHANGES</b>	<b>(4.0)</b>	<b>(32.5)</b>	<b>(0.2)</b>	

**Summary Prudential Indicators**

	<b>Per Treasury Management Strategy 20/21 £000's</b>	<b>Actual 20/21 £000's</b>
<b>1 Ratio of financing costs to net revenue stream:</b>		
(a) General Fund financing costs	32,841	30,714
(b) General Fund net revenue stream	231,815	231,815
General Fund Percentage	14.17%	13.25%
<b>2 Gross Debt &amp; Forecast Capital Financing Requirement</b>		
Gross debt including PFI liabilities	373,492	383,886
Capital Financing Requirement (forecast end of 21/22)	531,358	531,358
<b>Gross Debt to Net Debt:</b>		
Gross debt including PFI liabilities	373,492	383,886
less investments	-70,000	-76,594
less transferred debt reimbursed by others	-10,161	-10,161
Net Debt	293,331	297,130
<b>3 Capital Expenditure (Note this excludes leasing)</b>		
General Fund	232,744	194,211
<b>4 Capital Financing Requirement (CFR)</b>		
Capital Financing Requirement	492,506	503,213
Capital Financing Requirement excluding transferred debt	482,345	493,052
<b>5 Authorised limit for external debt</b>		
Authorised limit for borrowing	439,540	439,540
+ authorised limit for other long term liabilities	62,805	62,805
= authorised limit for debt	502,345	502,345
<b>6 Operational boundary for external debt</b>		
Operational boundary for borrowing	419,540	419,540
+ Operational boundary for other long term liabilities	62,805	62,805
= Operational boundary for external debt	482,305	482,305
<b>7 Actual external debt</b>		
actual borrowing at 31 March 2020		312,873
+ PFI & Finance Leasing liabilities at 31 March 2020		62,797
+ transferred debt liabilities at 31 March 2020		10,161
= actual gross external debt at 31 March 2019		385,831
<b>8 CIPFA Treasury Management Code – has the authority adopted the code?</b>		Yes

<b>9 Interest rate exposures</b>		
Upper Limit for Fixed Rate Exposures	439,540	292,336
<b>Variable Rate</b>		
Upper Limit for Variable Rate Exposures	87,908	-47,842
<b>10 Maturity structure of borrowing - limits</b>	<b>upper limit</b>	<b>actual</b>
under 12 months	50%	16.5%
12 months to within 24 months	20%	2.4%
24 months to within 5 years	30%	18.5%
5 years to within 10 years	30%	2.4%
10 years & above	100%	60.2%
<b>11 Investments longer than 364 days: upper limit</b>	30,000	30,000

### **Prudential Indicators**

The Cipfa Code imposes on the Council clear governance procedures for setting and revising of prudential indicators and describes the matters to which a Council will 'have regard' when doing so. This is designed to deliver accountability in taking capital financing, borrowing and treasury management decisions.

The Prudential Indicators required by the Cipfa Code are designed to support and record local decision making and not as comparative performance indicators.

There are eleven indicators shown on the previous page, and these are outlined below:

#### **Revenue Related Prudential Indicators**

##### **Ratio of Financing Costs to Net Revenue Stream (indicator 1):**

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet borrowing costs.

#### **Capital and Treasury Management Related Prudential Indicators**

##### **Gross Debt and Capital Financing Requirement (Indicator 2):**

The Council needs to be certain that gross external borrowing does not, except in the short term, exceed the total of the Capital Financing Requirement (CFR) in the preceding year plus the estimates of any additional capital financing requirement for 2021/22 and the next two financial years. The CFR is defined as the Council's underlying need to borrow for capital purpose, i.e. it's borrowing requirement. The CFR is the amount of capital expenditure that has not yet been financed by capital receipts, capital grants or contributions from revenue.

##### **Capital Expenditure (Indicator 3):**

This indicator is an estimation of the Council's future capital expenditure levels and these underpin the calculation of the other prudential indicators. Estimates of capital expenditure are a significant source of risk and uncertainty and it is important that these estimates are continually monitored and the impact on other prudential indicators (particularly those relating to affordability) are assessed regularly.

#### Capital Financing Requirement (Indicator 4):

As outlined in Indicator 2 above, the CFR represents the Council's underlying need to borrow for capital purposes.

#### Authorised Limit for External Debt (Indicator 5):

This statutory limit sets the maximum level of external borrowing on a gross basis (i.e. excluding investments) for the Council. Borrowing at this level could be afforded in the short term but is not sustainable. The Authorised limit has been set on the estimated debt with sufficient headroom over and above this to allow for unexpected cash movements. Borrowing plus PFI and finance lease liabilities at £385.8m was within the limit of £502.3m.

#### Operational Boundary for External Debt (Indicator 6):

This indicator refers to the means by which the Council manages its external debt to ensure it remains within the statutory Authorised Limit. It differs from the authorised limit as it is based on the most likely scenario in terms of capital spend and financing during the year. It is not a limit and actual borrowing could vary around this boundary for short times during the year. Borrowing plus PFI and finance lease liabilities at £385.8m was within the boundary of £482.3m.

#### Actual External Debt (Indicator 7):

This indicator identifies the actual debt at the end of the previous financial year as recognised with the Statement of Accounts.

#### Adoption of the Cipfa Treasury Management Code (indicator 8):

This indicator is acknowledgement that the Council has adopted the Cipfa's *Treasury Management in the Public Services: Code of Practice*.

#### Interest Rate Exposures for Borrowing (Indicator 9):

These indicators allow the Council to manage the extent to which it is exposed to changes in interest rates.

The Upper Limit for variable rate exposure has been set to ensure that the Council is not exposed to interest rate rises which could impact negatively on the overall financial position.

#### Maturity Structure of Borrowing – Limits (Indicator 10):

This indicator highlights the existence of any large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates and is designed to protect against excessive exposures to interest rate changes in any one period, thereby managing the effects of refinancing risks.

The maturity of borrowing is determined by reference to the earliest date on which the lender can require payment.

#### Investments Longer than 364 days: Upper Limit (Indicator 11):

This indicator sets an upper limit for the level of investment that may be fixed for a period greater than 364 days. This limit is set to contain exposure to credit and liquidity risk.

All these prudential limits need to be approved by full Council but can be revised during the financial year. Should it prove necessary to amend these limits, a further report will be brought to Cabinet, requesting the approval of full Council for the changes required.

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## Public report Cabinet

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Communities and Neighbourhoods Scrutiny Board (4)  
Cabinet

8th July 2021  
13th July 2021

**Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor D Welsh

**Director Approving Submission of the report:**

Director of Streetscene and Regulatory Services

**Ward(s) affected:**

All

**Title:**

Local Development Scheme

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**Is this a key decision?**

No – Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant.

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**Executive Summary:**

It is a legal requirement that a local planning authority must prepare and maintain a Local Development Scheme (LDS), which is a project plan setting out the timetable for the preparation of Development Plan documents. This report updates the previous LDS which was published in 2015.

**Recommendations:**

**The Communities and Neighbourhood Scrutiny Board (4) is recommended to:**

- 1) Consider the Local Development Scheme attached at Appendix 1 to the report.
- 2) Identify any further recommendations for Cabinet.

**The Cabinet is requested to:**

- 1) Consider any recommendations from the Communities and Neighbourhoods Scrutiny Board (4).

- 2) Approve the Local Development Scheme attached at Appendix 1 to the report and confirm that it can be brought into effect at the earliest opportunity.

**List of Appendices included:**

Appendix 1 – Local Development Scheme 2021

**Background papers:**

None

**Other useful documents**

Local Development Scheme 2015

**Has it been or will it be considered by Scrutiny?**

No

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

Yes – Communities and Neighbourhoods Scrutiny Board (4) on 8th July 2021

**Will this report go to Council?**

No

**Report title:** Local Development Scheme

**1. Context (or background)**

- 1.1. The Local Development Scheme (LDS) is a project plan which sets out which Local Plan documents are to be prepared, and the timetable for the preparation and completion of these so that local communities and interested parties can keep track of progress.
- 1.2. It is a legal requirement that a LDS is prepared, kept up to date and made publicly available. This LDS will therefore be published on the Council's website.
- 1.3. The documents which are covered by this LDS include the Local Plan which sets the development strategy and policies for the Coventry City Council area and a number of Supplementary Planning Documents which expand upon the Local Plan policies.
- 1.4. The Local Plan for Coventry was adopted December 2017. Paragraph 33 of the National Planning Policy Framework and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 require that policies in local plans should be reviewed to assess whether they need updating at least once every five years. Members will recall that consideration was given to whether the Local Plan should be reviewed earlier than this date and determined at Council on 8<sup>th</sup> December 2020 that the triggers had not been met, and that the review should take place in December 2022.
- 1.5. This LDS therefore runs until December 2022 in line with the timescale for review of the policies as set out above.
- 1.6. For clarity (although not a legal requirement) the attached LDS also includes a timetable for a suite of Supplementary Planning Documents (SPDs) which expand upon Local Plan policy. The topics for these are:
  - Open Space
  - Affordable Housing
  - Energy
  - Tall Buildings
  - Residential design
  - Biodiversity
- 1.7. Finally, for completeness, the LDS sets out information and guidance on Neighbourhood Plans, local plan monitoring and data standards.

**2. Options considered and recommended proposal**

- 2.1. The City Council could choose not to update the Local Development Scheme. However, it is a legal requirement that the LDS is kept up to date and so this option is not recommended.
- 2.2. The recommended option is to bring a new LDS into effect to ensure legal compliance and to assist all interested parties in understanding the programme for producing and reviewing Local Plan documents.

**3. Results of consultation undertaken**

- 3.1. This report has not been subject to consultation.

#### **4. Timetable for implementing this decision**

4.1. The decision will be implemented immediately.

#### **5. Comments from the Director of Finance and the Director of Law and Governance**

##### **5.1. Financial implications**

There are no financial implications to the recommendation.

##### **5.2. Legal implications**

Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) requires that a Local Development Scheme is prepared, kept up to date and made publicly available.

#### **6. Other implications**

##### **6.1. How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))**

The Local Development scheme sets out a timetable for producing a suite of planning policy documents which will help deliver the following objectives:

- A prosperous Coventry: The Local Plan is guiding the delivery of a prosperous Coventry, and maintaining the current plan will ensure that this continues;
- Increasing the supply, choice and quality of housing; the Local Plan is already delivering the right volume of housing, increasing choice and driving up quality, and maintaining the current Plan will ensure that this continues;
- Making Coventry an attractive and enjoyable place to be: The provisions of the Local Plan help deliver an attractive and enjoyable city;
- Making places and services easily accessible: The current Local Plan ensures the delivery of accessible places;
- Developing a more equal city with cohesive communities and neighbourhoods: The provisions of the Local Plan help deliver cohesive communities and neighbourhoods;
- Improving the environment and tackling climate change: The current Local Plan has a range of policies covering the environment and climate change.

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

There is no risk associated with the recommendations. The Local Plan and associated documents continue to deliver the growth required. Further, the Plan will be subject to a mandatory review at the end of 2022 which will allow a further assessment of the delivery and soundness of the Plan, and the Local Development Scheme will be revised accordingly to address the actions needed.

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

There is no direct impact on the organisation as a result of the recommendation.

**6.4. Equality/ EIA**

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

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

There is no direct impact from the recommendations of the report.

**6.6. Implications for partner organisations?**

None

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**Service**

Streetscene and Regulatory Services

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Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	14/06/21	15/06/21
Andrew Walster	Director of Streetscene and Regulatory Services	-	14/06/21	15/06/21
Councillor D Welsh	Cabinet Member for Housing and Communities	-	16/06/21	29/06/21

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# Coventry City Council Local Development Scheme

July 2021

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## 1.0 Introduction

1.1 The Local Development Scheme (LDS) is a project plan which sets out which Local Plan documents are to be prepared, and the timetable for the preparation and completion of these so that local communities and interested parties can keep track of progress.

1.2 It is a legal requirement<sup>1</sup> that a LDS is prepared, kept up to date and made publicly available. This LDS will therefore be published on the Council's website.

1.3 The documents which are covered by this LDS include the Local Plan which sets the development strategy and policies for the Coventry City Council area and a number of Supplementary Planning Documents which expand upon the Local Plan policies. We also include a section upon Neighbourhood Plans which communities can choose to prepare for their local area should they wish to do so.

1.4 This LDS runs until December 2022 to cover the period leading up to the requirement to review the Local Plan. The LDS will then be updated.

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<sup>1</sup> Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended)

## 2.0 The previous LDS

2.1 The previous Local Development Scheme was published in 2015, covering the period 2014 – 2017. It is important that the LDS is updated to reflect changes which have arisen since this date.

2.2 The former LDS was formulated to reflect the programme of works involved in taking forward the Local Plan and the City Centre Area Action Plan (AAP) along with proposals for introducing the Community Infrastructure levy (CIL) and a Supporting Housing Delivery Development Plan document.

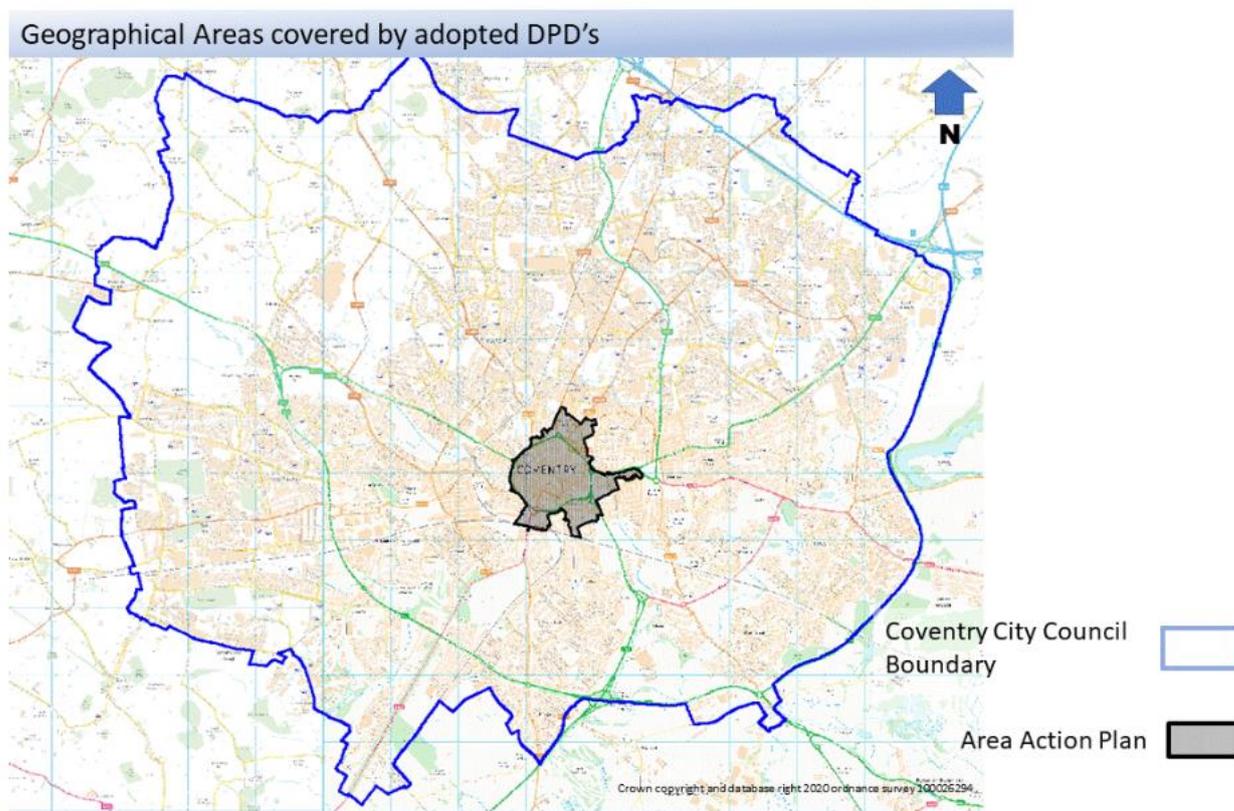
2.3 Both the Local Plan and the City Centre Area Action Plan were adopted by Coventry City Council in December 2017. The Community Infrastructure Levy will be the subject of a report taken to a Cabinet Member meeting in July 2021. The Supporting Housing Development Plan Document was superseded by the final adoption of the Local Plan in 2017 and so has not been progressed and is now removed from the LDS.

## 3.0 Development Plan Documents

3.1 Development Plan Documents (DPDs) are defined in the Local Plan Regulations 2012 (as amended). They address the development and use of land, the allocation of certain sites for particular purposes (for example housing, employment, retail, green space) and they include planning policies against which planning applications are assessed to help determine whether particular proposals are acceptable or not. DPDs have to be prepared in line with strict legal procedures, must be informed by robust evidence to ensure the policies and land allocations are soundly based and justified, and must be publicly examined by an independent Planning Inspector before they can be formally adopted by the Council.

3.2 The adopted DPDs for Coventry City Council are the Local Plan, which covers the entire administrative area of the City Council and the City Centre Area Action Plan which covers the City Centre (Both shown in Figure 1). These were adopted on 6<sup>th</sup> December 2017 and can be viewed on the Council's website at [www.coventry.gov.uk/planningpolicy](http://www.coventry.gov.uk/planningpolicy)

Figure 1



3.3 It should also be noted that Neighbourhood Plans can form part of the Development Plan: communities can choose to produce these for their local area should they wish to do so. Further information is contained within Chapter 5.

3.4 The Local Plan Regulations<sup>2</sup> require that Local Plans must be reviewed every five years, starting with the date of adoption. The review must take into account changing circumstances affecting the area, or any relevant changes in national policy<sup>3</sup> in order to determine whether any strategic policies need updating.

3.5 Bearing in mind the aforementioned requirement, Table 1 below sets out the timetable leading up to the review of the Local Plan (this covers both the Local Plan and the City Centre Area Action Plan). This includes the following stages:

- Review the adopted policies to consider whether they continue to comply with national policy;
- Publish a revised Local Development Scheme (i.e. this document);

<sup>2</sup> Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>3</sup> National Planning Policy Framework 2019 paragraph 33

## Coventry Local Development Scheme

- Undertake an assessment of Brownfield Site capacity;
- Produce an updated Annual Monitoring report and development trajectory to illustrate how current policy is performing against targets set out in the adopted plans;
- Refresh the database of brownfield sites to assess whether there are any which need adding to the database;
- Undertake initial scoping including updating key evidence to assess whether anything has changed which might mean policies and strategies need updating, including analysis of student accommodation demand and need;
- Consider the emerging results of the most recent Census (2021) and implications of these;
- In the light of the above, complete a review of the plan no later than November 2022 to determine whether policies need updating.

Table 1: local plan review timetable

	2021							2022												
	Jan to June 2021	July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
Review adopted policy																				
LDS to Cabinet & publish																				
Brownfield site assessment																				
AMR & Trajectory																				
Brownfield site refresh																				
Census initial release due																				
Scoping key issues / evidence update																				
Cabinet & Council Paper to trigger Review (no later than Nov 2022)																				

C – public engagement

## 4.0 Supplementary Planning Documents

4.1 Supplementary Planning Documents (SPDs) can be produced to elaborate upon adopted Local Plan policy where it is helpful to provide more detail to help deliver the policies of an adopted Local Plan. They cannot introduce new policy.

4.2 The Council intends to produce a number of SPDs to assist with the delivery of the Local Plan and City Centre Area Action Plan. The majority will cover the entire administrative area for Coventry City Council, except where noted. These are:

- Open Space
- Affordable Housing
- Energy
- Tall Buildings (city centre focus)
- Biodiversity
- Residential Design

4.3 The timetable for producing the above SPDs is set out below.

Table 2: SPD timetable

	2021				2022			
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sep)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sep)	Q4 (Oct-Dec)
Open Space SPD				C	A			
Affordable Housing SPD				C	A			
Energy SPD				C	A			
Tall Buildings SPD					C	A		
Residential Design SPD					C	A		
Biodiversity SPD					C	A		

C – Consultation

A - Adoption

## 5.0 Neighbourhood Plans

5.1 Communities can choose to prepare Neighbourhood Plans for their area should they so wish. These are independently examined and provided they meet a number of 'basic conditions' they can be voted on at referendum and, provided that a majority of the community vote in favour they can then be 'made' (ie adopted) as part of the Development Plan for the area. Planning applications can therefore be assessed to check whether they comply with the policies of the plan. Further information can be found at <https://www.gov.uk/guidance/neighbourhood-planning--2>

5.2 There is one adopted Neighbourhood Plan within Coventry City Council's area, Willenhall. This was made on 18<sup>th</sup> June 2018.

5.3 Two further Neighbourhood Areas have been designated: Allesley (designated on 4<sup>th</sup> May 2016) and Finham (designated on 16<sup>th</sup> March 2017) however these have not reached an advanced stage yet.

5.4 Up to date information on neighbourhood plans, their status and the geographical areas covered can be found at [www.coventry.gov.uk/localplan](http://www.coventry.gov.uk/localplan)

## 6.0 Monitoring and Data Standards

6.1 Progress on the compliance with the timetables contained within the Local Development Scheme will be reported in the Annual Monitoring Report which the Council publishes each December to show how Local Plan Review are Known (see table 1).

6.2 To comply with the legislation<sup>4</sup> all documents will be produced to accord with any data standards required by Government.

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<sup>4</sup> Planning and Compulsory Purchase Act 2004 as amended by the Neighbourhood Planning Act 2017

If you need this information in another format or language,  
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Coventry City Council

# AGENDA ITEM 5 Local Development Scheme

## Briefing note

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To: Cabinet

13<sup>th</sup> July 2021

Subject: Local Development Scheme

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### 1 Purpose of the Note

- 1.1 To inform the Cabinet of the resolutions arising from an item on the Local Development Scheme by the Communities and Neighbourhoods Scrutiny Board (4) at their meeting on the 08<sup>th</sup> July 2021.

### 2 Recommendations

- 2.1 The Cabinet is recommended to note that the Communities and Neighbourhood Scrutiny Board (4) supports the Local Development Scheme.

### 3 Background and Information

- 3.1 At their meeting on the 8<sup>th</sup> July 2021, the Communities and Neighbourhoods Scrutiny Board (4) considered an item on the Local Development Scheme.
- 3.2 The Board questioned officers, received responses, and discussed the following issues:
- The definitions of Affordable Housing and open space Affordable Housing.
  - Opportunities to increase levels of affordable and social housing the City.
  - Plans to protect the views of Coventry's spires.
  - The process for the adoption of neighbourhood plans.
  - 2021 census data which expected in first draft during May 2022 with an official release in 2023.
- 3.3 The Communities and Neighbourhoods Scrutiny Board (4):
- Supported the Local Development Scheme.

Victoria Castree  
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## Public report Cabinet

Cabinet

13<sup>th</sup> July 2021

**Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor D Welsh

**Director Approving Submission of the report:**

Director of Streetscene and Regulatory Services

**Ward(s) affected:**

All

**Title:**

Statement of Community Involvement

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**Is this a key decision?**

No -

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant

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**Executive Summary:**

This report seeks approval to adopt the revised Statement of Community Involvement (SCI) attached at Appendix 1 to the report.

The SCI is required by law. It sets out how the Council will engage communities and other interested parties in the planning process. It must be kept up to date and must be published on the Council's website.

The current adopted SCI was produced in 2012 and needs updating to reflect more recent changes in the planning system. A new SCI has been produced accordingly. Whilst there is no legal requirement to consult on an SCI, it is considered good practice to do so, and public consultation was undertaken for a period of six weeks from 15<sup>th</sup> February to 29<sup>th</sup> March 2021.

The responses have been analysed and the SCI has been amended accordingly. Appendix 2 to the report contains the schedule of summarised comments received and the officers' responses to each including any changes made to the SCI as a result.

**Recommendation:**

The Cabinet is requested to:

- 1) Adopt the Statement of Community Involvement attached at Appendix 1 to the report.

**List of Appendices included:**

Appendix 1 – Statement of Community Involvement

Appendix 2 – Summary of consultation responses

Appendix 3 - Briefing Note from Neighbourhood and Communities Scrutiny Board (4)

**Background papers:**

None

**Other useful documents**

Statement of Community Involvement Consultation Draft February 2021

Statement of Community Involvement 2012

**Has it been or will it be considered by Scrutiny?**

The consultation draft was considered by Communities and Neighbourhoods Scrutiny Board (4) on 18<sup>th</sup> March 2021 - the Board endorsed the statement in principle (see Appendix 3 to the report).

**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:**

### Statement of Community Involvement

#### **1. Context (or background)**

- 1.1. The Planning and Compulsory Purchase Act 2004 (Section 18) requires Local Planning Authorities to produce a Statement of Community Involvement (SCI) which explains how they will engage communities and other interested parties in producing their Local Plan and determining planning applications.
- 1.2. The current SCI was adopted in 2012 and requires updating to ensure that it reflects current planning practice and guidance and provides resilience to enable consultation and engagement to adapt to exceptional and unforeseen circumstances such as (although not exclusively) those highlighted by the current Covid-19 pandemic.
- 1.3. The planning process has to comply with a variety of legal procedures in terms of public consultation and engagement. The SCI sets out how the Council will address these and how the public can expect to be engaged and kept informed. It also sets out local standards for consultation and engagement. This applies to both Planning Policy, setting out how the process will be undertaken when preparing new or revised policy documents, and to Development Management in relation to the planning applications process.
- 1.4. There is no legal requirement to consult on the review of an SCI, however Coventry City Council considers it is good practice to do so. Authority to consult was granted by the Cabinet member for Housing and Communities on 12<sup>th</sup> February 2021, and ran for a period of six weeks, from Monday 15<sup>th</sup> February to Monday 29<sup>th</sup> March 2021. Due to Covid-19 restrictions this consultation was publicised on the Council's website, via its social media channels, via press release, via raising awareness with local partnerships, organisations and community interest groups and by direct email to those individuals and organisations who have requested to be included on the planning consultation database.
- 1.5. Appendix 2 to the report sets out the comments received, responses to the points made and any changes made to the SCI where applicable.

#### **2. Options considered and recommended proposal**

- 2.1. Cabinet may wish for the current SCI to remain in place. However, this is out of date as the planning system has changed considerably in recent years, and additionally there is now a requirement to review the SCI every five years to ensure it remains up to date. Therefore, this option is not recommended.
- 2.2. The recommendation is to adopt the new SCI, as per Appendix 1 to the report, in order to conform with regulation and to ensure that the City Council effectively engages and consults with its communities.

#### **3. Results of consultation undertaken**

- 3.1. The SCI was consulted on for a period of six weeks between 15<sup>th</sup> February and 29<sup>th</sup> March 2021. The comments received, and responses to these including amendments to the SCI are contained at Appendix 2 to the report.

#### **4. Timetable for implementing this decision**

4.1. The decision will be implemented immediately.

#### **5. Comments from the Director of Finance and the Director of Law and Governance**

##### **5.1. Financial implications**

There are no financial implications to the recommendation.

##### **5.2. Legal implications**

There are no direct implications as a result of this report. Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications.

Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant.

#### **6. Other implications**

##### **6.1. How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))**

Planning policy documents and planning applications help deliver the aims and objectives of the One Coventry Corporate Plan by determining the type and quantum of development needed, where this should be located, areas which should be protected, enhanced or improved and the infrastructure which should be provided. In line with the Corporate Plan, this enables the delivery of employment and investment opportunities, helping our centres to thrive, delivering a range of housing and infrastructure to meet the community's varied needs and ensuring the right facilities are in place to enable the city's profile to be raised. The SCI sets out how residents, businesses and other stakeholders and interested parties can have a say in the area in the planning processes which impact the area in which they live, work, study or visit.

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

There are no risks associated with this report. The Statement of Community Involvement does, however, relate to consultation processes and procedures some of which would require individual risk assessments at the appropriate time, for instance when hiring a venue for a consultation event.

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

There is no direct impact on the organisation as a result of the recommendation.

##### **6.4. Equality/ EIA**

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

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

There are no implications identified.

**6.6. Implications for partner organisations?**

There are no implications identified.

**Report author:****Name and job title:**

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Principal Town Planner (Planning Policy)

**Service**

Streetscene and Regulatory Services

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David Butler	Head of Planning Policy and Environment	Streetscene and Regulatory Services	10/06/21	11/06/2021
Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	14/06/21	15/06/21
<b>Names of approvers for submission:</b> (officers and members)				
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Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	14/06/21	15/06/21
Andrew Walster	Director of Streetscene and Regulatory Services	-	14/06/21	15/06/21
Councillor D Welsh	Cabinet Member for Housing and Communities	-	16/06/21	29/06/21

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# Coventry City Council

## Statement of Community Involvement

July 2021

## Statement of Community Involvement

Adopted version

July 2021

Contact:

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## 1.0 Introduction

1.1 The Statement of Community Involvement (SCI) is legally required to be produced by councils to set out how they will engage communities in the planning process. The SCI has to be kept up to date. This version replaces the previous version which was adopted in 2012.

1.2 The SCI focuses upon the two key elements of the planning process: Planning Policy and Development Management.

1.3 Planning policy sets out the strategic context within which planning applications are considered. In this section of the SCI we set out the key documents we need to produce, and how we will engage communities when we produce these. This includes what we must do by law, and what else we will do to ensure that we reflect the local context. We also include a short section on Neighbourhood Plans. The City Council does not produce these itself but is required to support their production, so we set out what we will do.

1.4 The SCI then looks at the Development Management side of the process. This includes pre-applications (where advice can be requested to guide the production of a planning application or to give an idea of its likelihood of approval), the planning application process itself and how and when decisions are published.

1.5 We also consider resilience. The COVID-19 pandemic meant that many adopted SCIs could not be complied with fully because consultation processes depended upon events being attended in person and hard copies of documents being placed in libraries and so on. The system had to adapt and the law was temporarily changed to enable the planning process to continue, but online. This SCI makes provision for this and ensures flexibility to ensure that it can adapt to any future unforeseen circumstances.

1.6 Finally, consultation and engagement often requires the collection of personal data. We keep this to a minimum, but we handle and manage data in compliance with data protection law. You can find out more in Chapter 5.

## 2.0 Planning Policy

### General Standards

2.1 The following general standards will be adhered to at all stages of plan making where consultation is undertaken. These will be applied to all documents produced by the Planning policy service which are to be adopted by the Council including Development Plan Documents (DPDs), Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs). We will:

- Ensure consultation and engagement is in accordance with statutory provisions and in line with the relevant Regulations. This will include consultation with specified statutory bodies and other parties at the necessary stages of the policy making process;
- Publish on our website - [www.coventry.gov.uk/planningpolicy](http://www.coventry.gov.uk/planningpolicy) all completed evidence used for developing our policy documents, including Plain English non-technical summaries where evidence is of a complex and technical nature;
- Provide a record of what evidence has been commissioned and the expected date for completion and publication of this;
- Publish our Local Development Scheme (the project timetable for producing all our planning policy documents) on our website at the above link. We will update this at least annually, or when there are significant changes to the timescales or plans being prepared. We will report on progress through our annual Authorities Monitoring Report which we also publish on the same web page;
- Place Planning Policy consultation documents on the Council website together with any supporting information needed to enable people to understand what they are being asked to comment on and state where and when documentation can be inspected;
- Make full use of online consultation methods as the primary means of notification, engagement and involvement, but adapt to alternative methods where specific needs are identified for groups or individuals, or where legislation requires;

- Ensure that documents are publicised and made available as required by the relevant legislation. The Council will use libraries and/or other public venues within the city where they would help the local community access information. However, in extreme circumstances (such as a global pandemic) this might not be an available option and so full use of electronic versions of material will always be made available on the Council's website. This detailed further in Section 4, which covers matters of resilience.
- Contact specific consultees as set out in the relevant legislation and those who have asked to be included on the Planning Policy consultation database, and invite them to make representations, advising where and when the relevant material can be inspected, how copies can be obtained, the closing date for representations and where to send any representations;
- Use the Council's website and social media channels to raise awareness of consultation programmes and how to engage;
- Consider the use of adverts and/or press releases to local newspapers circulating in the area, if those documents are known to achieve reliable circulation and would help a community access information on a consultation which would be relevant to them, advising where and when the relevant material can be inspected, how copies can be obtained, the closing date for comments and where to send these;
- Use internal and external best practice to meaningfully engage with citizens, especially hard to reach groups;
- Provide appropriate advice and information to the public as requested;
- Produce a report summarising consultation methods, representations made and Council responses (whether requiring a change to the document or not).

## **Plan Making Standards (additional to our General Standards)**

### **Local Plan and Area Action Plans (AAPs)**

2.2 The Local Plan provides the key local statutory planning policy framework for the area covered by Coventry City Council. Area Action Plans have the same formal status but focus upon a targeted area such as a city centre for example. Effective community and stakeholder involvement in their preparation are therefore highly important. The production of these documents must comply with a number of statutory stages, and these are set out below, along with details on how we will

consult in addition to our 'general' standards. The list of statutory consultees can be found by using the following links:

[www.gov.uk/guidance/plan-making](http://www.gov.uk/guidance/plan-making)

[www.legislation.gov.uk/uksi/2012/767/regulation/4/made](http://www.legislation.gov.uk/uksi/2012/767/regulation/4/made)

### **Regulation 18: preparation of a Local Plan**

2.3 This statutory stage, also known as the 'survey' stage, requires the Council to consult about the scope of the proposed Local Plan. What geographic area will it cover and what should that plan address in terms of town planning. Usually, this will be done in the form of an 'issues', 'scope' or 'issues and options paper'. For this stage we will:

- Discuss the scope of the plan, and issues needing to be addressed (and options for dealing with these where applicable) with partners and with communities through existing forums and groups, with particular attention to 'hard to reach' communities;
- Arrange events and/or workshops to discuss issues and proposals. Place emphasis on understanding community views at early stage of plan making and explore and resolve conflicts as far as possible;
- Agree strategic matters which need to be addressed beyond the Local Authority boundaries through the statutory Duty to Co-operate and initiate Statements of Common Ground.

### **Preparation of Draft Local Plan**

2.4 This is a non-statutory stage and will not apply for all Local Plans as consultation needs to be proportionate to the scope and matters being dealt with by the specific plan. Where a draft Local Plan (which may sometimes be called 'preferred options' or similar) is produced we will:

- Seek consensus in any emerging planning policy positions via discussion with partners and communities through existing forums and groups, with particular attention to 'hard to reach' communities and in events and/or workshops;
- Arrange events and/or workshops to discuss issues and proposals.

### **Regulation 19 Stage: Publication of Local Plan**

2.5 Before submitting the Local Plan to the Government for independent examination, the Council must publish all material to be submitted. This includes the final draft of the Plan. Comments (representations) can be made but the process at this stage is, by law, very formal. Comments must focus on whether the plan can be considered 'sound', which is defined as being 'positively prepared, justified, effective and consistent with national policy'. For this stage we will:

- Send a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and the times at which they can be inspected to all of the consultees that were invited to comment in earlier plan making stages;
- Publish for a six-week consultation period in accordance with legislative requirements;
- Seek views on whether the document is legally compliant and sound;
- Agree and finalise Statements of Common Ground as required by Planning Practice Guidance under the statutory Duty to Co-operate.

### **Submission of Local Plan**

2.6 The Council must submit the Local Plan and accompanying documents to the Government via the Planning Inspectorate. The Council will:

- Submit the document and relevant supporting information to the Secretary of State for independent examination.
- Notify statutory consultees and others who have requested to be informed when the document is submitted and where copies can be inspected.

### **Examination of Local Plan**

2.7 An Inspector, appointed by the Secretary of State, will examine the document. The Inspector will consider whether the preparation of the plan has been legally compliant. All management of the examination process is now undertaken by a

Programme Manager who runs the process on behalf of the Planning Inspector. They will:

- Publish details of the time and place at which the Independent Examination is to be held and the name of the Inspector.
- Notify those who made representations at the Publication stage (and have not withdrawn their representations) of relevant matters the Inspector will discuss at the Examination Hearings. If the Plan is legally compliant the inspector will then consider whether the document is 'sound'. (It will be considered sound if it is positively prepared, justified, effective and consistent with national policy).
- Publish documents relevant to the Independent Examination on specific examination pages on the Council's website.

### **Publishing the Inspector's report**

2.8 The Inspector will make the report as concise as possible while ensuring it is adequately reasoned. Once in receipt and all checks have been made, the Council will:

- Publish the Inspectors recommendations and reasons for those recommendations as set out in legislation including publication on the Council's website. The Inspector who carried out the Independent Examination will produce and publish an Inspector's Report.
- Notify those who have requested to be notified of the recommendations, that the recommendations are available. The Inspector will recommend that the document is: 'adopted'; 'adopted with recommended modifications' (if the Council asks the Inspector to suggest modifications to make the document sound); or 'not adopted'.

### **Adopting the Local Plan or AAP**

2.9 The Council will need to formally approve (adopt) the Local Plan (or AAP) at this stage. Once the Plan has been adopted in accordance with all statutory and local requirements, the Council will:

- Publish the Local Plan (or AAP) Document, Adoption Statement, Sustainability Appraisal and details of where and when the document can be viewed.

2.10 If the document is recommended for adoption (with or without recommended modifications) the Council will consider the Inspector's report and whether it wishes to adopt the document as recommended by the Inspector.

- Send a copy of the adoption statement to the Secretary of State.
- Send copy of the Adoption Statement to anyone who has asked to be notified of the adoption of the document.

2.11 If the Council decides to adopt the document, this will be by the Full Council, with any main modifications as required

- Use local media/press to advertise the adoption of the Local Plan Document;
- Where applicable, incorporate Main Modifications suggested by the Inspector to ensure the plan is sound and potentially additional modifications (any additional modifications must not materially affect the policies, ie change their meaning).

2.12 It should also be noted that there is a requirement to review Local Plans five years from adoption to see if any policies need to be updated. If they do not, the Council must publish its reasons for this decision. If policies do need reviewing, then the processes for consulting on a Local Plan will be followed as set out above and in line with statutory procedures.

### **Supplementary Planning Documents (SPDs)**

2.13 SPDs are produced to support and elaborate the policies contained in the Local Plan. They provide additional information and policy guidance to support the implementation of a policy. The procedures for SPD preparation are more straightforward than for the Local Plan or an AAP. The Council will apply the general standards for planning policy consultation and apply specific SPD requirements as set out below:

- Consult for no less than 4 weeks (as this is a statutory requirement) and no more than 6 weeks - in most cases the Council will seek to undertake formal consultation for 6 weeks.
- If consultation responses require substantial changes to the document, carry out a further round of consultation seeking views on the amendments.

## **Adoption**

2.14 Once the SPD has been approved by the Councils cabinet, we will:

- Post details of the adoption of the final SPD, and information on how to obtain copies of the SPD and the appropriate Cabinet report on the planning policy pages of the website.

## **Neighbourhood Planning**

2.15 There are three main mechanisms for Neighbourhood Planning:

- Neighbourhood Plans,
- Neighbourhood Development Orders and
- Community Right to Build.

Each enables a community to achieve different things.

2.16 **Neighbourhood Plan** is a way of helping local communities to influence the planning of the area in which they live and work. It can be used to:

- Develop a shared vision for a neighbourhood.
- Choose where homes, shops, offices and other development may be built.
- Identify and protect important local green spaces.
- Influence what new buildings should look like.

2.17 **Neighbourhood Development Order** can help to implement a shared vision by granting planning permission to certain types of development in certain locations, without the need to submit a planning application to the Local Planning Authority. A

Neighbourhood Development Order can apply to all of a Neighbourhood Plan area, or a particular site within the neighbourhood.

**2.18 The Community Right to Build (CRTB)** allows local communities to undertake small scale, site-specific, community-led developments. It is a particular type of Neighbourhood Development Order which allows community organisations in some cases to bring forward small scale development on specific sites without following the usual planning permission process. However, a CRTB need to be in conformity with the Local Plan and, if applicable, the Neighbourhood Plan for any given area. A CRTB needs to relate to an approved Neighbourhood Area. As with Neighbourhood Plans and Development Orders, a CRTB is subject to an independent examination and a referendum and the Local Authority needs to be involved in these stages in the same way.

2.19 The process for preparing a Neighbourhood Plan and a Neighbourhood Development Order is similar. Unlike Local Plans, Neighbourhood Plans and Neighbourhood Development Orders are not prepared by the local planning authority. There are two types of 'qualifying body' that can prepare a Neighbourhood Plan or a Neighbourhood Development Order:

- **Parish and Town Councils:** In areas where a Parish or Town Council exists, these are the organisations which will usually be responsible for a Neighbourhood Plan, but other parts of the community may prepare a plan if they are established as a neighbourhood area. A Neighbourhood Plan can, but does not have to, cover the whole area of the parish or town.
- **Neighbourhood Forums:** Where a parish or town council does not exist, community members, including those with business interests in the area, can come together to create a neighbourhood forum. Only one neighbourhood forum is allowed to exist for each neighbourhood to be covered by a Neighbourhood Plan.

2.20 Consultation and community involvement are important elements in the Neighbourhood Planning process. At the issues and draft plan stages, this will be the responsibility of the plan making body, but the City Council has a significant role at the other stages identified below, including the proposed Neighbourhood Plan Area, the proposed creation of a Neighbourhood Plan Forum, the Independent Examination and the Local Referendum.

2.21 The requirements for consultation are set out in the 2012 Town And Country Planning, England - The Neighbourhood Planning (General) Regulations 2012 (as amended), In each case, the regulations refer to the need for the Council to: *“publicise..... on their website and in such other manner as they consider is likely to bring the area application to the attention of people who live, work or carry on business in the area to which the area application relates”* The NPPG explains the Neighbourhood Plan system including the key stages and considerations required and the Neighbourhood Planning Act 2017 updates the legislative requirements.

### **The Council’s role in Neighbourhood Planning**

2.22 The planning policy pages on the Council’s website will be used to provide further information and keep stakeholders up to date, including a dedicated web page. The Council will ensure the Qualifying Body preparing a Neighbourhood Plan, Neighbourhood Development Order or CRTB is informed by email as to where the evidence base is located and when it has been updated and where the Local Development Scheme (the project timetable for Local Plan documents) is located and when it has been updated.

2.22 The Council will make available Neighbourhood Planning guidance to Parish Councils and Neighbourhood Forums.

2.23 The Council will not produce a Neighbourhood Plan, Neighbourhood Development Order or CRTB on behalf of a local community but will give assistance and advice to Qualifying Bodies in the plan preparation process to facilitate proposals, including advice on consultation.

2.24 The Council, as the Local Planning Authority will, if requested, administer the formal designation of Neighbourhood Area(s) to be covered by Neighbourhood Plan(s).

2.25 The Council will check a draft Neighbourhood Plan, Neighbourhood Development Order or CRTB to ensure that it meets all the relevant legislation and

regulations and that it generally conforms to the strategic elements of the Local Plan.

2.26 Subject to the above, the Council will arrange for an independent examination of a Neighbourhood Plan, Neighbourhood Development Order or CRTB. If the plan passes an examination, the Council, as Local Planning Authority, will arrange a local referendum.

2.27 If the referendum supports the document in securing more than 50% of the returned votes, the Council will adopt it as part of the overall development plan (which includes the Local Plan). Should post-adoption modifications become necessary, the Council will offer guidance and support on the process.

2.28 Other means of stimulating community involvement, as outlined in this SCI, will be used according to local circumstances. Parish Councils and Neighbourhood Forums will be encouraged to apply the principles set out in the SCI to their own consultation and community engagement programmes.

## 3.0 Development Management

3.1 Development Management consider the detailed proposals that are submitted to Coventry City Council for determination and investigate any breaches of planning control.

3.2 Application proposals submitted to the Council are considered against current legislation, national guidance, the Development Plan and relevant adopted Supplementary Planning Guidance (SPG)/Supplementary Planning Documents (SPD).

3.3 The Government has set out minimum standards for consultation on planning applications in the National Planning Practice Guidance and Article 15 of the Town and Country Planning (Development Management Procedure) Order 2015 (DMPO) as amended. There are three categories of application, which require differing levels of publicity:

- All applications subject to an environmental assessment. All applications which are a departure from the Development Plan and all applications affecting public rights of way are required to be publicised by the display of a notice on the site for a minimum of 21 days excluding bank holidays, and by the placing of an advertisement in a local newspaper. This is in addition to any of the requirements pertinent to the scale of the development set out in the DMPO.
- Applications defined as “major” applications by the DMPO are required to be publicised by the display of a site notice or letters written to adjoining owners/occupiers of land, and by placing an advertisement in a local newspaper.
- If an application does not fall in the above categories, then it is required to be publicised by the display of a site notice **or** by letter to adjoining occupiers/owners.

3.4 Applications for listed building consent, applications affecting the setting of a listed building, or the character or appearance of a conservation area require

publicity by way of a site notice and a newspaper advertisement. The requirements for publicity are set out in Regulation 5 and 5A of the Listed Buildings and Conservation Area Regulations 1990 (as amended).

### **General advice and assistance**

3.5 A wealth of information on the Council's development management functions including validation requirements can be obtained on the website:

[www.coventry.gov.uk/planningapplications](http://www.coventry.gov.uk/planningapplications)

3.6 The Planning Portal is an online planning, appeals and building regulations resource for England and Wales and also provides advice and services for the public and professionals: [www.planningportal.co.uk](http://www.planningportal.co.uk)

### **Pre-application Consultation**

3.7 The Government's National Planning Policy Framework (2019) emphasises the importance of community involvement in shaping development proposals. Paragraph 128 states: "Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'

3.8 The benefits of pre-application engagement by prospective applicants are also made clear in the Government's National Planning Practice Guidance. It sets out how pre-application engagement can improve both the quality of planning applications and the likelihood of success by:

- Working collaboratively and openly with interested parties at an early stage to identify, understand and seek to resolve issues associated with a proposed development;

- Discussing the possible mitigation of the impact of a proposed development, including any planning conditions;
- Identifying the information required to accompany an application, thus reducing the likelihood of delays in registering the submitted application.

3.9 It also recognises that the approach to pre-application engagement needs to be tailored to the nature of the proposed development and the issues to be addressed. The Council has adopted a pre-planning application advice protocol which can be found on the Council's Website.

[https://www.coventry.gov.uk/info/110/planning/3082/preapplication\\_advice\\_for\\_planning\\_highways\\_and\\_drainage](https://www.coventry.gov.uk/info/110/planning/3082/preapplication_advice_for_planning_highways_and_drainage).

3.10 The Council will offer pre-planning application advice upon completion of the pre-application advice form (and relevant accompanying information) and receipt of the pre-application advice fee. The Council will not commence work on the pre-planning application advice enquiry until the fee and information has been received. In-line with national guidance, Coventry City Council will strongly encourage applicants to involve local communities at pre-application stage.

### **How Planning Applications are decided**

3.11 Applications submitted to the Council are registered, acknowledged and validated. Once an application is accepted as valid it is recorded on the planning register that the Council is required to maintain and make available for inspection. The register is available on the website via the planning pages. <http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet>. Application documents are available for download. Computers are available at the Council's Libraries for website access and Broadgate. Interested parties can also check the progress of an application via the same web pages.

3.12 A weekly list of planning applications can be viewed on the Council's website via the planning pages. A link to the webpage is sent to the local press and Ward Members. Once a valid application has been received the Council's arrangements for publicity and notification will never be less than the statutory minimum set out in the Development Management Procedure Order 2015 (and its amendments). In addition

to this, wherever possible, a draft agenda will be published on the website 14 days before the Committee.

3.13 Where neighbour notification is required standard letters are sent to immediate neighbours. The statutory consultation period is 21 days. If significant material amendments to plans or other details are received during the course of processing the application, the persons notified and/or those who have commented on the application thus far will be re-notified and given a minimum of 7 days to make any representations. This will not be necessary, if, for example, material amendments reduce the scale of proposals to make it acceptable. Where an initial comment has been received and an email address is provided any re-notification on the same application will be via email, written comments will be notified by letter.

3.14 Statutory consultees are also consulted. Exactly which body is consulted depends on the nature of the application but includes organisations such as the Environment Agency or Historic England for example. There are also a significant number of non-statutory bodies which the Council may consult in appropriate circumstances. The DMPO sets out statutory consultation requirements.

3.15 Certain types of application do not require consultation with anyone under the legislation such as non-material amendments. This process is only generally used where the change is small relative to the size of the overall development or where the change would have no impact to anyone. We are not required to consult on condition compliance applications - this is when details are submitted to the Council to confirm the details submitted for the purposes of any 'conditions' placed on a planning permission; for 'prior notifications' in relation to certain types of development; and, in relation to certificates of lawfulness for proposed development, where the application is seeking a determination of whether or not the development needs planning permission.

3.16 During the consultation period, representations received should raise material planning considerations to carry any weight in the determination of the application, which is set out on the Council's website:

[www.coventry.gov.uk/info/110/planning/801/planning\\_and\\_consultation\\_advice/2](http://www.coventry.gov.uk/info/110/planning/801/planning_and_consultation_advice/2)

The considerations must also fairly and reasonably relate to the application concerned. The Council encourages representations to be submitted through the

Councils online portal. All representations must be made in writing or by email giving the name and address of the respondent. Verbal representations cannot be considered in the determination of an application. Any representations received which refer to material planning considerations either for or against the proposed development will be considered.

3.17 The Council aims to determine planning applications within statutory time limits (usually major applications within thirteen weeks and other planning applications within eight weeks). Most planning applications are determined under delegated powers. The scheme of delegation can be found on the Councils website:

<https://edemocracy.coventry.gov.uk/documents/s48868/Part%20%20-%20Scheme%20of%20Delegation.pdf>

3.18 In cases where applications are reported to Planning Committee, the Case Officer prepares a report for the Committee that outlines the proposal, sets out consultation replies, assesses the relevant issues and makes a recommendation.

3.19 The Council will not as a matter of course reply to or acknowledge representations made but will not determine a planning application until the public consultation period relevant to the application has expired. Any person who has commented on a proposal will be notified if an application is to be reported to Committee for determination. Information on public speaking at Planning Committee, the dates, times and locations of the Planning Committee meetings can be found on the website.

Table 1: Publicity on planning and heritage applications

Type of Application	Publicity Method (Statutory requirement)			
	Site Notice	Neighbour notification letter	Press Notice	Website
Minor applications	Discretionary	✓		✓
Major applications (including outline and reserved matters)	✓	✓	✓	✓
Applications requiring EIA	✓	✓	✓	✓
Applications affecting listed building or conservation area	✓	✓	✓	✓
Advertisement consent	✓	Discretionary		✓
Trees Preservation Order applications	✓	✓		✓
Notification of works to Trees in a Conservation Area	Discretionary	Discretionary		✓
Non-material amendments	No notifications carried out			✓
Prior approval applications	Discretionary	✓		✓
Lawful Development Certificate applications (existing)				✓
Lawful Development Certificate applications (proposed)	No notifications carried out			✓
Discharge of conditions applications	No notifications carried out			

## 4.0 Resilience

4.1 Legislation sets out the minimum standards for publicity and consultation on planning applications and plan-making. The Council will always aim to meet these requirements. As the Covid-19 pandemic has shown, however, there may be exceptional circumstances where legislation makes temporary provision to allow Councils to deviate from their adopted SCI. At the time of preparing the SCI, many of the procedures proposed (such as face to face events for example) would not be appropriate due to government restrictions. The following paragraphs set out the Council's temporary provisions to enable work to be progressed where a pandemic prevents or restricts social interaction, in line with any government legislation which is applied at that time.

### Planning Policy Documents

4.2 We have identified that providing physical documents for inspection would be inconsistent with the Government's Covid-19 legislation and guidance regarding staying at home and social distancing. Therefore, our main means of communication will be to provide access to documents on our website for the purposes of consultation although different formats can still be provided upon request. Communication and publicity will be via electronic means. However, this is only a temporary measure whilst the impacts of COVID-19 are limiting the deployment of our full suite of consultation approaches.

4.3 Use of social media and online technology may be a 'best fit' alternative to face to face engagement through means such as online exhibitions, 'virtual' drop-in events on video platforms e.g. Microsoft Teams and presentations at 'virtual' committee meetings and public meetings. The effects of COVID-19 on consultations will be kept under review in light of Government guidance and consultations will take place in a manner appropriate for that time.

### Planning Applications

4.4 In response to the Covid-19 pandemic the government published temporary legislation [www.legislation.gov.uk/ukxi/2020/731/made](http://www.legislation.gov.uk/ukxi/2020/731/made) and planning practice

guidance [www.gov.uk/guidance/coronavirus-covid-19-planning-update#publicity-and-consultation-for-planning-applications](https://www.gov.uk/guidance/coronavirus-covid-19-planning-update#publicity-and-consultation-for-planning-applications) in respect of the publicity and consultation requirements for planning applications.

4.5 This provides local planning authorities the flexibility to take other reasonable steps to publicise applications if they cannot discharge the specific requirements for site notices, neighbour notifications or newspaper publicity. Any such steps should notify people who are likely to have an interest in the application and provide detail of where further information about it can be viewed online. This could include, for example, the use of social media and other electronic communications and must be proportionate to the scale and nature of the proposed development.

### **Openness and transparency**

4.6 We aim to make the planning application process as open and transparent as possible. We publish application information on the Council's website so that people can make comments. We do not publish neighbour comments online although we may refer to them within the case officer/committee reports. Redacted copies of neighbour comments will be made available on request. The website provides guidance on privacy:

[www.coventry.gov.uk/info/107/planning\\_and\\_development/3212/planning\\_privacy\\_notice](https://www.coventry.gov.uk/info/107/planning_and_development/3212/planning_privacy_notice)

4.7 Any updates with regard to planning and Covid-19 can be found at:

[www.gov.uk/guidance/coronavirus-covid-19-planning-update](https://www.gov.uk/guidance/coronavirus-covid-19-planning-update)

## 5.0 Data Protection

5.1 For many aspects of our standards regarding engagement, involvement and consultation methods relating to the planning process will require the need to gather personal data. Our reasons for this, and the type of data required will vary depending upon the procedure and stage in the process.

5.2 When we collect such data, we will ensure that we do so in a clear and legally compliant manner to fulfil the requirements of Data Protection law. The relevant Fair Processing Notices (also known as Privacy Notices) can be found on the data protection pages of the Councils website:

[www.coventry.gov.uk/info/248/freedom\\_of\\_information\\_and\\_environmental\\_information\\_regulations/3179/coventry\\_city\\_council\\_privacy\\_notice/15](http://www.coventry.gov.uk/info/248/freedom_of_information_and_environmental_information_regulations/3179/coventry_city_council_privacy_notice/15)

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

**Telephone: (024) 7683 1109**

**e-mail: [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk)**

Organisation/ Individual	Response Summary and key issues raised	Officer response	Proposed change to SCI
Natural England	Not able to comment in detail.	Noted.	No change.
'Lets Talk' response	Welcome pre app consultation but would like to see more use of social media and residents association sites being used to publicise pre apps and applications.	The Council currently utilise social media platforms and will continue to do so planning policy documents. In respect of planning applications, the Council do not carry out publicity for pre-applications but the applicants often do which the Council encourage.	No change.
'Lets Talk' response	Make it simple.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way.	No change.
'Lets Talk' response	Planning application and policy process needs to be more open and transparent. There needs to be a lot more information given to residents by the council if the forums are not going to keep us informed, and as someone who works and cares for a disabled relative its impossible to get to meetings during the day, but that's something else that has been noticeable when the council become involved, there is no thought for the workers and no plans to allow them the ability to become involved.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way. The standards and commitments for community engagement and consultation are clearly set out in sections 2 and 3 for planning policy documents and planning applications.	No change.

'Lets Talk' response	Document is too detailed.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way.	No change.
'Lets Talk' response	Not detailed and does little to inspire confidence. Communications on planning should be proactive by contacting residents' associations.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way, and we are seeking to improve our systems form a user perspective. In relation to planning policy matters, residents associations can request to be included on the consultation database so that they receive notification of any policy consultations (such as the Local Plan for example).	No change.
'Lets Talk' response	Looks ok.	Noted.	No change.
'Lets Talk' response	No commitment to update the planning platform.	System provision is beyond the scope of the SCI, and we are seeking to improve our systems form a user perspective.	No change.

'Lets Talk' response	The draft SCI contains a great deal of good intent; the extent to which that it is followed will determine its success. Observations include: more to be done to understand cumulative effects of multiple schemes in one area, greater transparency of s106 agreements and how and when implemented.	We published our Infrastructure Funding Statement (IFS) in December 2020 and we will commit to review and update the IFS and our Monitoring Report on an annual basis as per the statutory requirements to ensure there is a comprehensive and transparent approach to how developer contributions are being used.	No change.
'Lets Talk' response	More needs to be done to stimulate genuine community involvement at the early stages of planning and encourage formation of Parish Councils, neighbourhood forums and plans.	Para's 2.15-2.28 inclusive as drafted in the SCI detail the approach to neighbourhood planning together with the Councils website: <a href="http://www.coventry.gov.uk/info/111/planning_policy/3600/coventry_local_plan_2011-2031/5">www.coventry.gov.uk/info/111/planning_policy/3600/coventry_local_plan_2011-2031/5</a>	No change.
Highways England	No comment.	Noted.	No change.
The British Horse Society	No comment other than to say we would welcome inclusion of future consultation.	The representor will be notified as requested and added to the planning policy consultation database.	No change to the SCI but will be added to the planning

			policy database.
Individual respondent	<p>Suspects the 2021 version is intended to remove community involvement unless required by law and wants to retain the 2012 version. Method of notification of planning applications needs to be improved to include 21st century communication i.e. email and SMS. Plus if any aspect fails e.g. planning portal is down or not updated then the notification has to be extended by the amount of time any systems were down or not available. Currently, notification is not required if a road separates you from the planned site even if you are opposite the development, I propose notification is within a radius of so many metres of the development so covering in front, to the side and behind. The distance depending on the scale of the development. Suggestions, extension to a house 25m, new single house 50m, development under 10 houses or flats 100m and over 10 houses or flats 250m.</p>	<p>The 2021 SCI has been revised to take account of changes to Government legislation and guidance since the existing SCI was adopted and to bring it up-to-date with wider Council priorities, processes and strategies. It has been written to be flexible to be able to respond to the changing needs of communities over time to ensure inclusive engagement in planning policy issues.</p> <p>In respect of planning applications, the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the consultation method and there is no way of knowing email addresses for adjoining neighbours. Officers can ask for wider consultation if necessary/desirable based on the type of application or where any extension /building is located on a site. The minimum standards are set out within legislation and this minimum will be exceeded in most instances as officers undertake further consultation dependant on the nature and scale of the development.</p>	No change.

<p>Historic England</p>	<p>Support the approach to the draft SCI and would welcome notification of proposed neighbourhood planning areas and draft plans.</p>	<p>We can confirm the representor will be notified as requested.</p>	<p>No change.</p>
<p>Individual respondent</p>	<p><b>Access to public venues:</b> not all areas of the city have a library within walking distance and would be too far for residents to walk especially if they are elderly or disabled. This is discrimination as a result of cuts made to local services (which were precipitated by the fall in local authority funding from central Government). How does Coventry City Council (CCC) ensure that residents in Longford have the same opportunity as others in the City to view planning applications and consultation documents? Does CCC identify alternative locations where documents can be viewed in areas such as this? Where can Longford residents go to use computers to search the planning register online or respond to consultations and surveys with support but without incurring travel costs? Where will notices be displayed so that residents are aware of public consultations? Ideally, Longford should have access to its own library service. However, under current circumstances alternative measures should be put in place. Could a reinstated mobile library service provide suitable facilities? For example, the weekly list of planning applications and notices about consultations could be put on display and reference copies of the local newspaper, where CCC advertisements are published, could also be made available. Should a list of suitable venues and their contacts be maintained so that public consultation sessions/events can be arranged when needed? Could more use be made of the community noticeboards?</p>	<p>All planning policy consultation documents are available to view online and the Council will continue to help all users of the planning service to help themselves through appropriate means. Facilities are available at both Holbrooks and Bell Green libraries in addition to other libraries across the city to enable the viewing of planning documents. The planning team will notify users when planning policy document consultations are live. The Council's planning team have previously carried out extensive drop-in sessions during consultation events visiting local neighbourhoods and communities and as part of the SCI, this approach will continue to be part of the toolkit when consulting in respect of planning policy documents as specified in para 2.4. Notices for planning policy document consultations are provided through press releases and posts on social media platforms and the website together with notification by email and/or letter, where appropriate.</p>	<p>Additional point made in para 2.1 regarding utilising best practice engagement techniques.</p>

Individual respondent		<p>Notices for planning applications are provided through neighbour letters and site and press notices depending on what is set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>However, we note the comments and will continue to explore options to increase awareness of, and participation in, planning matters. An amendment to the SCI will be made to support this ongoing commitment.</p> <p>The questions relating to access and the provision of library services would be more appropriately directed to the Councils library services team in the first instance as it is beyond the scope of the SCI to address this issue. The planning team do liaise with library services when planning consultation events and drop-in services to ensure users have access to all information they may need.</p>	
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Individual respondent	<p><b>Local newspapers:</b> it would be useful to state where CCC advertisements can be found (i.e., which newspaper) in supporting documentation about planning. In addition, local libraries should ensure that reference copies of newspapers are available so that residents have free access to information.</p>	<p>In terms of planning policy, advertisements are made on the policy web pages and via the Councils social media platforms together with press releases, usually in the Coventry Telegraph. To the best of our knowledge, local libraries do have reference copies of newspapers available to view for users.</p> <p>In terms of planning applications, again, the Coventry Telegraph is used, where appropriate.</p>	No change.
	<p><b>Online Portal:</b> Difficult to download from the portal on accession.</p>	<p>System provision is beyond the scope of the SCI but we are continually seeking to improve the service as a result of feedback.</p>	No change.
	<p><b>Acknowledgement of representations:</b> how do residents know whether an email or letter has been received and that it has been forwarded to the correct planning officer? How do they know whether their document can be read if it has been attached to an email? What happens if a resident raises concerns about issues such as flood risk, evidence of contamination or the presence of a protected species on a site? Are these types of concern ever investigated further? Are the planning application committee members given the option to read comments in their original format? Summarising residents' concerns as a generalised bullet point list may not convey the significance of the issues raised or provide enough context.</p>	<p>In terms of planning policy, representations would be acknowledged as a matter of course as and when received. Issues relating to flood risk, evidence of contamination or the presence of a protected species on a site are all matters that would be considered by policy as part of the consideration of constraints during plan making and are always considered when raised by residents. If such matters need to be considered further there will be ongoing discussions with</p>	No change.

Individual respondent		<p>the organisations concerned as part of the Duty to Cooperate to find solutions and agreement, where necessary.</p> <p>In terms of planning applications, customers will not know the response has been forwarded to the correct officer, but the planning applications admin team undertake quality control to ensure the representations are sent to the correct officer. Emails sent to the team email address receive an automatic confirmation of receipt.</p> <p>The case officer can raise the issues raised such as flood risk, contamination and protected species with an appropriate consultee such as ecology if the case officer has not already been made aware of the issues. Planning Committee Members could request a redacted copy of neighbour representations. Copying, what can be extensive pages of neighbour representations in a report is not considered necessary or helpful. The case officer aims to identify and highlight the relevant material considerations.</p>	
	<p><b>Statutory duty to co-operate and cross-boundary issues:</b> In areas on the administrative boundary, such as Longford, the local authorities have not worked together effectively and this has led to an impact on the scoping of</p>	<p>Comments noted but it is considered they fall outside the scope of the SCI's aims and objectives and would be</p>	<p>No change.</p>

	<p>social and environmental issues. In particular, the cumulative impact of strategic allocations on traffic levels, air quality, flood risk and flood storage, biodiversity, climate change, access to services (e.g., GP and schools), green space, play areas and sports provision. Effective engagement with local residents would have highlighted these issues at a much earlier stage during the development of the local plans but unfortunately many people were unaware of the existence of these documents let alone the importance of engaging with the consultation process. When the local plans and supplementary planning documents are reviewed, it is essential that these issues are addressed. Statements of Common Ground should include social and environmental issues especially where cumulative impact is likely. Also, it is important that local residents are better informed about the process particularly when there are strategic allocations near to where they live. There also needs to be better communication with residents from other local authorities who live near to the administrative boundary. For example, events should be held to consult residents on their views and documents ought to be made available to view within their libraries or other public venues and this needs to be advertised in their local newspapers.</p>	<p>more appropriately considered through the plan review and/or plan making process. Reference is made and addressed in para 2.3, third bullet point regarding the cooperation on cross boundary issues, and national Planning Practice Guidance sets out clear expectations in terms of preparing Statements of Common Ground. In terms of awareness- raising of planning policy consultations in local communities (including those who live beyond the City Council's boundaries), the SCI contains a range of methods for doing this, including consultation databases, the local press and social media feeds</p>	
<p>Coventry Society</p>	<p>The Planning System is a very complicated and constrained process, which is difficult for a lay person to comprehend. The local planning authority is often blamed by residents for approving planning applications where it had no alternative but to do so because of national policy or other considerations. Council planning officers are the experts about how things work, whilst residents are generally ill informed about such matters. Such power imbalance does not lend itself to effective engagement. For consultation to be effective there is a need to empower residents by educating them about the planning world, so that they can focus on areas where there is a chance of achieving change. What is needed is a programme of training and support for community organisations so that they can become true participants in decision making rather than unhappy observers and complainants.</p>	<p>We support helping people to help themselves and so it is suggested this would be more appropriately considered by the individual(s) themselves independent of the Council. We will investigate putting more information on the policy and/or planning website to help explain in a more detailed way. The Planning Portal also provides helpful guidance to the system and how it works <a href="https://www.planningportal.co.uk/info/200127/planning">https://www.planningportal.co.uk/info/200127/planning</a></p>	<p>No change.</p>

	<p>The SCI mostly conceives 'community' to mean geographical communities. But there are many other types of community in the city that have an interest in its development and many of those communities are organised and represented through a host of voluntary and community organisations. Their role should also be recognised.</p>	<p>Noted: community and voluntary groups play an important role in society and it is appreciated that many of these are not geographical in nature and the SCI is worded to encompass all groups and organisations. Any individual or organisation can request at any point to be added to the planning policy consultation database. In terms of planning applications, such groups are not recognised as statutory consultees but again individuals or organisations can submit comments.</p>	<p>No change to the draft SCI but for planning policy matters, any individual or group can be added to the consultation database.</p>
Coventry Society	<p>We would like to see proposals included to consult with 'hard to reach' groups. Such groups might include disadvantaged communities, people whose first language is not English, young people and people with limited access to the Internet.</p>	<p>Contact information is already provided for such requests on the final page of the draft SCI. For planning policy, we work closely with internal and external stakeholders to ensure hard to reach groups are captured as far as possible to ensure engagement with disadvantaged communities and we have worded the SCI to provide flexibility in our consultation methods to ensure that we are inclusive and proactive. It is acknowledged that reference to such groups within the SCI would be helpful and we have added this in.</p>	<p>Insert the words 'including hard to reach groups' throughout section 2, but specifically in para 2.3, point 1, and para 2.4 point 1</p>

Coventry Society	<p>We would like to see the re-establishment of Ward Forums, but if that is not possible then a new online pattern of ward pages, focused around the ward councillors. Details of planning applications within each ward could be showcased there together with the local impact of council policies.</p>	<p>This is not a planning issue as the decision to abolish Ward Forums was a wider corporate Council decision. Notwithstanding, planning officers still attend public meetings as requested by Members, where appropriate.</p>	<p>No change to the SCI but we will feedback the comment to appropriate colleagues within the Council.</p>
	<p>With the Coventry Local Plan being reviewed in 2022, we would like to see early and deep engagement with the people of the city in this updated document. The re-establishment of ward forums should be part of the consultation processes on the development of the Plan.</p>	<p>The commitment to early engagement is covered specifically through para's 2.3-2.4 of the draft SCI.</p> <p>The point regarding Ward Forums is not a planning issue as the decision to abolish Ward Forums was a wider corporate Council decision. Notwithstanding, planning officers still attend public meetings as requested by Members, where appropriate.</p>	<p>No change.</p>
	<p>We would like the SCI to include proposals for the promotion, support and encouragement for people to submit applications for local listing and reporting issues relating to Conservation Areas or other heritage assets. We would specifically like to read of action to engage local communities in the preparation of Conservation Area Assessments and Management Plans.</p>	<p>This already exists through the services of the Councils Urban design and heritage team. Notwithstanding, reference is made in para 3.7 of the draft SCI to the importance and benefit of quality design in the planning process.</p>	<p>No change.</p>

Coventry Society		<p>Local authorities are not required to provide public consultation for new conservation areas, however if stakeholders request amendments to boundaries of existing Conservation Areas, then we are required to consult the public. Notwithstanding, planning officers have and will continue to proactively engage and consult stakeholders in respect of Conservation Area Appraisal work across the city in line with good practice.</p> <p>The process for how we will deal with planning applications in conservation areas are covered by section 4 of the draft SCI and associated table 1.</p> <p>Further information can be found at: <a href="https://historicengland.org.uk/advice/hpg/has/conservation-areas/">https://historicengland.org.uk/advice/hpg/has/conservation-areas/</a></p>	
	<p>We would like the SCI to include a list of statutory consultees, local group categories and duty to cooperate bodies, perhaps as an appendix. This would be helpful in demonstrating to the public the types of bodies councils consult as part of the statutory process.</p>	<p>For planning policy matters, such lists can be found using the links below. We have avoided inserting specific lists in the SCI to ensure that the document remains up to date as sometimes such lists of consultees do change and the links would reflect these</p>	<p>Insert a new sentence at the end of para 2.2 to read 'The list of statutory consultees can be found</p>

		<p><a href="http://www.gov.uk/guidance/plan-making">www.gov.uk/guidance/plan-making</a> <a href="http://www.legislation.gov.uk/uksi/2012/767/regulation/4/made">www.legislation.gov.uk/uksi/2012/767/regulation/4/made</a></p> <p>In respect of planning applications, there is a national list of statutory consultees (depending on the type of application the ones that need to be consulted will be selected from this list). The officers report on the application will provide the detail of this information and the responses received. The responses will also be viewable online under the planning application reference number.</p>	<p>by using the following links’.</p> <p><a href="http://www.gov.uk/guidance/plan-making">www.gov.uk/guidance/plan-making</a> <a href="http://www.legislation.gov.uk/uksi/2012/767/regulation/4/made">www.legislation.gov.uk/uksi/2012/767/regulation/4/made</a></p>
Coventry Society	Although the draft SCI includes reference to the use of digital consultation, we would like to see a section of the document dedicated to this and being more pro-active and forward looking, rather than just responding to the Covid crisis.	The SCI already commits to digital consultation throughout the entire document (not just in relation to the pandemic) and specifically in sections for both Planning Policy and Development Management.	No change.
	We would like to see a stronger emphasis on pre-application engagement with local communities on significant developments. We would like to see the local authority make it clear to developers that this is a requirement of the process and not just something desirable.	Para’s 3.7-3.10 inclusive of the draft SCI detail the commitments to pre-application engagement. CCC remains committed to the pre-application process and strongly encourages applicants to engage meaningfully with communities prior to submitting applications. However, the NPPF is clear that such pre-application work	No change.

		cannot be made a requirement of submission.	
	<p>The City Council includes a list of all planning applications on its website. However, the information provided is so broad and extensive that it is not easy for a community group (or individual) to see what is happening that is significant or important, amidst a plethora of applications for extensions and lawful development certificates etc. Whilst an extension might be important to a neighbour, it is not generally significant to the wider city. The Coventry Society provides a service of filtering planning applications every week and re-listing the more significant applications in a more accessible format on our website at <a href="https://www.coventrysociety.org.uk/planning-applications.html">https://www.coventrysociety.org.uk/planning-applications.html</a></p> <p>Over recent months we have also highlighted the most interesting applications. We think that the Council should take over this responsibility and provide alternative filtering of applications to make the weekly lists more relevant to people in the city. For example we think that it should be possible, at the click of a link, to see all applications in a Ward; all applications in Conservation Areas, all applications for Listed Building Consent, all Outline applications etc. We think that the SCI should include a commitment to developing such an approach.</p>	<p>The suggestion is welcome and IT improvements will be made to enable the service to be accessed and used more effectively. The new search facility will make it easier to operate, and the weekly list indicates within which Ward the applications have been made.</p>	<p>No change to the SCI but ongoing improvements to the Councils IT service will be made.</p>
Coventry Society	<p>We would like to see community engagement in the process of identifying the necessary amelioration associated with major developments. Currently section 106 contributions are used as a milch cow for the education and health services and local residents who have to put up with the damage to their environment caused by development get no say in how it's spent. We would also like to see community engagement in the development of policy in this area and especially if the council makes the much delayed move toward the use of a Community Infrastructure Levy.</p>	<p>Comments are noted and whilst S106 is governed by strict legal requirements, information is published annually on how this is allocated and spent through the Infrastructure Funding Statement.</p> <p>Section 106 agreements ensure that development contributes to the local communities through a variety of projects including open space and</p>	<p>No change.</p>

		biodiversity, as well as health, education and many others.	
Coventry Society	We are aware that engagement with the public is a scary thing for some officers. We would like to see a training and support programme put into place to assist officers engaging with the public. We believe that done properly engagement can be a fulfilling experience for officers.	Noted. All officers within planning are entitled to, and receive training as part of the corporate approach to staff development and as a part of the continuing professional development seminars and events which do focus on engagement.	No change.
	With the Government giving much greater emphasis than previously to the quality of new design, especially in housing, we would like the SCI to include proposals about how that will be achieved in Coventry. It is clear to us that local communities need to be involved in the development of design guides and statements.	It is agreed there is much more emphasis upon design form Government. Para 3.7 of the draft SCI addresses and makes specific reference to the importance of design quality and the proceeding para's detail the approach to community involvement in this regard.	No change.
Coventry Society	We acknowledge that engagement requires resources and that the City Council is limited in the resources available to them. However, we feel that as a minimum the Council should appoint a Planning Engagement Officer to promote, support and develop the engagement process in the city.	We work closely with our internal and external stakeholders in respect of engagement as we need to utilise the Councils limited resources effectively, but are continually considering ways in which things can be improved and this includes training and development opportunities for officers. Any decisions regarding new job roles is more appropriately considered through the Councils planning management team however the comments are	No change.

		noted and this feedback will be relayed.	
Individual respondent	It would be useful to know what has, and has not, been taken into account when assessing the individual Planning Applications. Where there are several developments being assessed for a local area it appears that each is considered on its own merits and the complete picture may not be fully taken into account. A statement within the planning documents would make this clear.	Each application is assessed on its own merit having regard to other material considerations. The officer report will contain the reasoning for any recommendation.	No change.
Individual respondent	The SCI proposal to include ' <i>Plain English non-technical summaries where evidence is of a complex and technical nature</i> '. This would be especially of interest where Traffic Assessments are being consulted as they are by nature very technical and quite detailed. The full implication of a proposal may not be readily inferred by a non-specialist from the reports that are made available.	Noted and agreed – the draft SCI provides such a commitment in para 2.1. for evidence base documents.	No change.
Individual respondent	There are a significant number of comments throughout the document that refer to 'consultation at an early stage with affected local communities'. This is a fundamental part of the Planning process as far as I am concerned, and many of the issues that arise at the approval stages could well be mitigated had early consultation have taken place, and not just lip service to community consultation. This would result in better developments with far greater buy-in from the affected communities than currently seems to be the case.	Agreed. The SCI provides a commitment to undertake consultation at an early stage in the planning process as specified in paras 3.7-3.10 and paras 2.3 – 2.4.	No change.
	There was no mention of working closely with neighbouring councils to align Local Plans, or to propose any way to resolve issues that may arise from the different focus the differing councils may have. This is definitely an issue in the area in which I live and should be addressed.	It is considered this point is best addressed through the existing Duty to Cooperate process, but in any event, this is specifically addressed in para 2.3 bullet 3 of the draft SCI.	No change.

	<p>Section 106 agreements are appended to a development in a cursory manner, giving brief details regarding the amounts of monies and to whom it should go to. There is usually little or no detail of how the money was calculated or is to be used, nor importantly the timing of that spend. There are quite often mismatches between the money to be spent and the provision of the public resource that is proposed, eg schools or health facilities to be extended or built to provide spaces for new residents. This ought to be clarified at the time the agreement is committed to.</p>	<p>Where details of s106 contributions are required these can be found in the responses to the planning application consultations which are published online and summarised in the officers report.</p>	<p>No change to the draft SCI</p>
<p>Individual respondent</p>	<p>I am greatly concerned that this anticipated policy revision will become a 'lame duck' before it hits the water! As an organisation, we have been subject to frustration over many years as to the 'Principle to Practice' gap, there having been a consistently abject failure to properly engage with local groups such as ours. My fear is that this will prove to be yet another mere token gesture serving only to fulfil a 'legal requirement'. In our experience, the so-called 'Consultation Process' has never properly engaged the community. The publicity within the neighbourhood, more often than not, has neither been timely nor thorough, usually offered by the would-be developer rather than the Authority itself. This minimalist approach has not been appreciated, indicating a 'hands off' rather than a 'hands on' strategy of responsibility avoidance. Any initiatives in relation to the sharing of ideas with regard to intended developments have been almost entirely on our part.</p> <p>This presumptuous lack of co-operation by the Council has resulted in a woefully dispirited sense of 'official' neglect when essential 'local knowledge' factors have not been taken into account, especially in planning matters involving infrastructure and the environment. There is, or should be, a reason why 'Communities and Housing', for example, have been linked as a Director's post. The S.C.I. should reflect a practical determination on behalf of the Council to involve citizens in decision-making which will not only promote good relations between the elected and the electorate, but also prevent</p>	<p>We believe the 2021 draft SCI is a balanced approach to community involvement, engagement and consultation going forward taking account of current guidance and examples of good practice.</p>	<p>No change.</p>

	wastage of time, effort and money on ill-informed projects. We ask for 'works' not 'words'.		
Individual respondent	<p><u>1 – Introduction</u> [to the SCI]</p> <p>Community involvement = legal requirement – how often? Surely more frequently than every 9 years.</p> <p>Timing – Why now? There is a MHCLG consultation and pilot which envisages much more community involvement (more than CCC/planning dept would probably like!). Will this (consultation) document be amended if the MHCLG consultation and pilot meet with general approval and legislation is enacted and this document doesn't adequately reflect the new requirements?</p> <p><i>'It has to be kept up to date'</i> – 9 years since 2012! Not exactly keeping up to date (especially given NPPF was revised in Feb 2019). What about SPG? Presumably no legal requirement seeing as CCC's most recent one for design requirements dates back to 1991! 2012 → review after 18 months. Was it reviewed? Even if it was, it has probably largely ignored in the intervening 6-7 years. Having regular review dates built in is absolute basics for any self-respecting organisation! Presumably, this document/process will be subject to the same external scrutiny detailed in the 2012 document which gives a timeline for 2005/2006 (p10). Why wasn't it approved until 2012? Just how long has CCC been inept? Why is this document 24 pages (and the 2012 document 52 pages)? It appears to be a very skimpy version - no appendices? Attempt to minimise community engagement rather than broaden? If MHCLG envisages more community involvement there should be more detail as to how you intend to achieve this.</p>	<p>The SCI has been revised now to take account of the changes to national legislation and guidance and to bring the existing 2012 SCI up-to-date. We believe the 2021 draft SCI is a balanced approach to community involvement, engagement and consultation going forward which takes account of current guidance and examples of good practice. We have made it shorter to ensure it is more concise and accessible (we have had comments about documents being too long) and have included links (eg to lists of statutory consultees, or to specific guidance or legislation) so that the SCI does not quickly become out of date if this information changes. Rather than minimising engagement we seek to ensure we are flexible and adaptable to respond to the changing needs of communities over time.</p> <p>We believe the section on resilience is robust and capable of responding to changes. However, if Government legislation changes in respect of planning, consideration will be given to</p>	No change.

		decide whether the SCI needs to be reviewed at the appropriate time.	
Individual respondent	<p><u>2 - Planning Policy:</u> [Chapter of the SCI] Para 2.1 [of SCI] – ‘where consultation is undertaken’ - when won’t/wouldn’t consultation be undertaken? ‘Ensure that documents are publicised and made available as required by the relevant legislation’ - including hard copies.</p> <p><u>Local Plan (+AAP):</u> Para 2.3/2.4 [of the SCI] — needs to be advertised much more widely (with timescale) &gt; household leaflet, if you are genuine in your desire for community involvement otherwise it ends up as ‘them and us’ as appears to be the case at present (particularly green belt development). I was ignorant of the 2016 consultation despite living in Coventry. Too much re-AAP (city centre) passes under the radar. I suspect a lot more would be objected to if only we knew.</p> <p>Section on Local Plan focuses heavily on statutory procedure – and consultees (and doesn’t really concentrate on the general public) &gt; see RTPi proposals.</p> <p><u>SPD:</u> Para 2.13/2.14 of the SCI – SPD/SPG affects every household and should be debated/discussed/voted on by full Council. Why has the SPG on design guidance for residential development not been updated since 1991?! Document is woefully inadequate in some areas.</p>	<p>We believe the 2021 draft is a balanced approach to community involvement, engagement and consultation going forward, to encourage a range of views from all sections of the community.</p> <p>Para 2.1 of the draft SCI sets out that documents will be made available upon request as required by relevant legislation.</p> <p>Para 2.2-2.4 of the draft SCI state that full use of press releases will be made together with notifications on the Councils social media platforms.</p> <p>Extant and long standing SPDs are currently being reviewed separately from the SCI and the Councils Local Development Scheme (LDS) will bring forward detailed timetables for this work.</p>	No change.
Individual respondent	<p><u>Neighbourhood Plans/Neighbourhood Development Order/Community Right to Build:</u> [2.15-2.28 of the SCI] Para 2.15 of the SCI – These should be actively promoted rather than the current policy/attitude which appears to be ‘we’d rather nobody finds out about these!’</p>	The Council have a duty to support and help facilitate the neighbourhood planning process. The Council remain committed to do so as specified in para’s 2.15-2.28 inclusive.	No change.

<p>Individual respondent</p>	<p><u>3 - Development Management</u> [section of the SCI]</p> <p>‘Advice can be requested’ – this is too lax and should be tightened – e.g. too many HMO are being approved on the nod and some areas are becoming HMO ghettos. CCC needs to get a grip of this. HMOs dilute community cohesion and are often linked to crime hotspots.</p> <p>Para 3.2 of the SCI – why does the Council allow the Planning dept to ignore (not adhere to) Local Plan site allocations which have been adopted by full council i.e elected officials? Why, in some instances, are officers allowed to ignore/disregard the Local Plan so flagrantly?</p> <p>Para 3.3 of the SCI – environmental assessment – surely this should apply to most (in not all) in line with climate change/net-zero priorities (read RTP1 response and how important they rank this).</p> <p><u>Pre-app consultation</u> (Para 3.7-3.10 of the SCI) – appears to be inconsistent and not monitored sufficiently by LPA; effective engagement! Insufficient follow-up with regard to ‘working collaboratively ... understand + seek to resolve issues’. Officers should be required to engage more (rather than seeing the public as a nuisance). Mitigation/planning condition ... public not consulted on these – need for more transparency.</p> <p><u>How planning applications are decided</u> (Para 3.11-3.19 of the SCI)</p> <p>Para 3.11 of the SCI – According to MHCLG - <i>legally</i>, a hard copy should be available for consultation, if requested.</p> <p>Para 3.16 of the SCI – why do material considerations seem to vary from one LPA to the next? Surely there should be a nationally recognised list/register!</p> <p>Para 3.17 of the SCI – delegation: a thorny issue - officers are not accountable to the electorate and can’t be voted out! Delegating ‘reserved matters’ from planning committee seems a slippery slope and detrimental as developers are very skilled at exerting pressure/making threats (if officers don’t cede to their demands).</p>	<p>Each application is determined in accordance with the Development Plan unless material considerations indicate otherwise. In terms of the Environmental Assessment, national regulations guide which applications require an Environmental Statement.</p> <p>Material considerations do not vary between Local Planning Authorities and it is not possible to provide a list.</p> <p>Delegation of authority to determine planning applications is essential to ensure decisions are made in a timely manner for less controversial applications.</p>	<p>No change.</p>
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<p>Individual respondent</p>	<p><u>4 – Resilience (pp21-22 of the SCI)</u></p> <p>Covid-19/compliance – why send out notification letters (spring 2020) saying documents could be consulted in libraries/ Broadgate when they couldn't. Sloppy - does nobody proof-read letters?</p> <p>Para 4.1 of the SCI - What reassurances that in practice this will only deviate from SCI where Westminster legislation allows and will not be used as an excuse to obstruct/abuse due democratic process?</p> <p>Para 4.2 of the SCI – Physical documents – nothing to stop these being printed and posted (as subsequently implied). People without reasonable broadband (usually pensioners/the most deprived) are discriminated against – even more than is usually the case. ‘Different formats can still be provided upon request’ – such as? The LPA has a statutory requirement to make a hard (paper) copy available.</p> <p>Para 4.3 of the SCI Social media should only ever complement normal means of communication - people who shun social media (FB) should not be precluded or discriminated against in any way. Social media should NOT replace traditional means of communication. It must not be seen as the new normal.</p> <p>Para 4.4 of the SCI (Planning Applications)</p> <p>Para 4.5 of the SCI – It is NEVER acceptable to abdicate your statutory duty to send out neighbour notifications (or site notices/newspaper adverts). Failure to do so would be irresponsible (and illegal). It is inconceivable that there would be a situation where the postal service is suspended. Social media is never acceptable as an alternative because some people refuse to have FB accounts because of their privacy/data policies and government/local government should never capitulate to social media as the primary means of communication. ‘Any such steps should ... likely to have an interest ...’ is too vague and is not prescriptive enough. Any property which is required by law to be notified <b>must</b> be notified. There must be no loopholes. Any attempt to adopt a minimalist approach to public consultation would be detrimental and</p>	<p>We believe the 2021 draft is a balanced approach to community involvement, engagement and consultation going forward.</p> <p>Re paras 4.1 and 4.2: Section 4 clearly states such practices will be used where there are exceptional circumstances directly informed by national legislation. It is only right and proper the SCI provides a commitment to provide the necessary means to ensure community consultation is carried out in all circumstances and situations.</p> <p>Para 2.1 point 7 of the draft SCI commits to ensuring documents are made available as appropriate.</p> <p>Re Para 4.3: Social media platforms and other electronic methods complement other forms of consultation but section 4 of the draft SCI is focusing on being resilient during the COVID-19 pandemic and potential future such situations, and it is only right and proper the SCI provide appropriate commitments to operate during such situations whilst adhering to national legislation.</p> <p>Re: Points relating to paras 4.4 – 4.6 of the SCI - all statutory required</p>	<p>No change</p>
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Individual respondent	<p>alienate/antagonise the public even more because the evidence already points to the planning dept. favouring developers over the public.</p> <p>Para 4.6 of the SCI – ‘Open and transparent’ – if that is the case, why are some applicants allowed to have their name etc redacted?! No reasonable justification.</p>	<p>notification is carried out for submitted planning applications and all applicant's names are now redacted apart from a select few types of application in accordance with GDPR. If people are genuinely needing assistance, planning officers will do their best to help. Prior to the pandemic, officers have knocked the neighbours door to explain the planning proposals where they are elderly or disabled.</p> <p>The current standards and commitments provided by the draft SCI adequately address the points raised.</p>	
Individual respondent	<p>I'm puzzled at the timing of this consultation given the government (MHCLG) consultation (#2) and pilot which follows on from Teresa May and others kicking up a stink last autumn. Just in case you don't follow them on linkedin (or elsewhere) here's what I got in my 'feed' from MHCLG a couple of months ago. Hopefully, you will note the clear emphasis on communities and let's hope (for the sake of Coventry) this is enacted because the system, at the moment, seems heavily skewed in favour of developers and residents are viewed as a nuisance.</p> <p>Press release: All new developments must meet local standards of beauty, quality and design under new rules. Local communities will be at the heart of plans to make sure that new developments in their area are beautiful and well designed. Ministry of Housing, Communities and Local Government: Videos   LinkedIn (most recent) <a href="https://www.gov.uk/government/news/all-new-developments-must-meet-local-standards-of-beauty-quality-and-design-under-new-rules">All new developments must meet local standards of beauty, quality and design under new rules - GOV.UK (www.gov.uk)</a></p>	<p>We believe the 2021 draft is a balanced approach to community involvement, engagement and consultation going forward. The SCI has been revised now to take account of the changes to national legislation and guidance and to bring the existing 2012 SCI up-to-date.</p> <p>All officers within planning are entitled to, and receive training as part of the corporate approach to staff development and as a part of the continuing professional development seminars and events which do focus on engagement.</p>	No change.

<p>Individual respondent</p>	<p>Communities to be at the heart of plans for well-designed neighbourhoods, to help us Build Back Better. Every council to create their own local design code so new developments can reflect what local communities truly want                  New 'Office for Place' to be set up, to help communities turn these designs into a local standard for all new developments. More funding to help communities nominate local historic buildings for listing. Proposals mean local communities will have the power to decide what buildings in their areas should look like, to help the country Build Back Better.                  The RTPi proposals for planning reform (= feedback to MHCLG?) also makes for interesting reading (inc. these key excerpts relevant to SCI):  <i>Perhaps the most egregious issue for local communities is schemes being permitted that the local plan says should be refused. (Very simple solution - instruct the unelected Planning dept officers to adhere to it rigidly when applications relate to sites allocated in the Local Plan otherwise how can we have any confidence in the process. After all, Cllr Welsh claims 'the Local Plan means a lot to a lot of people.'! There is a high risk that communities will be disenfranchised from engaging in the planning system unless much greater involvement in local plans can be brought about. + A culture shift to front-loaded engagement. Therefore, we need a targeted public awareness campaign to raise awareness of the purpose and benefits of good planning and improve clarity on how, when and why people should engage.</i>  <u>'Planning with and for people': Community Planners</u> Centrally funded positions of Community Planners in local authorities are needed to ensure a dedicated focus on hearing the views of communities and providing training on the technical and soft skills needed for participatory engagement particularly with hard to reach groups, including those without access to digital technology. They can also help facilitate community involvement in monitoring the local plan between reviews.  <u>Popup Planning Shops</u> One way for us to ensure that digital engagement works for everyone, is to provide hands-on help for it. Many local planning authorities are accustomed to taking over empty shops or village halls for the duration of local plan consultation exercises. An extension of this would be for</p>	<p>The planning policy service is also committed to fully utilising consultation technology alongside other methods in line with latest good practice to ensure all sections of the community have the ability to put their views forward in an easy and effective way possible and ensuring digital inclusion through the introduction of a bespoke consultation management system later in 2021. This will help facilitate improved levels of community engagement and consultation at the earliest stages of plan preparation and throughout the entire journey of securing a revised Local Plan that will deliver the growth needs of Coventry.</p>	
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	<p>“shops” where experts help people use the consultation technology , including helping people log their comments. This is a model which works well for retail (e.g. the Apple store). We think it would ensure digital inclusion.</p>		
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## Briefing note

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To: Cabinet

13<sup>th</sup> July 2021

Subject: Adoption of Statement of Community Involvement

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### 1 Purpose of the Note

- 1.1 To inform the Cabinet of the resolutions arising from an item on the Statement of Community Involvement by the Communities and Neighbourhoods Scrutiny Board (4) at their meeting on the 18<sup>th</sup> March 2021.

### 2 Recommendations

- 2.1 The Cabinet is recommended to note that the Communities and Neighbourhood Scrutiny Board (4) supports the Statement of Community Involvement in principle.

### 3 Background and Information

- 3.1 At their meeting on the 18<sup>th</sup> March 2021, the Communities and Neighbourhoods Scrutiny Board (4) considered an item on the Draft Statement of Community Involvement as part of the consultation process.
- 3.2 The Board considered a presentation on the Draft Statement of Community Involvement, questioned officers, received responses, and discussed the following issues:
  - The Scrutiny welcomed the document which had last been refreshed in 2012.
  - The statement would help to engage communities with the planning process. With larger developments this would mean getting developers to engage at an early stage and better publicity and notification when applications were due to go to Committee.
  - There were opportunities to evolve how we engage with communities – continuing to use traditional methods when appropriate but also using technology to offer alternatives and attract input from a wider demographic.
  - The planning framework was set nationally, and the Council would work flexibly within the constraints of it to get as much involvement as possible.
  - Local Plans need to be reviewed five years from adoption to see whether they remain up to date. The five-year trigger for Coventry is December 2022.
  - It was possible for neighbourhoods preparing Neighbourhood Plans to cross local authority boundaries but a forum which recognised the area would need to be created and recognised.
  - If the housing numbers were reviewed now, it would lead to an uplift in housing targets due to the Government making changes to the way in which housing need is calculated.

### 3.3 The Communities and Neighbourhoods Scrutiny Board (4):

- Supported the Statement of Community Involvement in principle
- Supported the updating of the Coventry City Council Planning Portal to improve involvement of residents in the planning process
- Recommended that the Cabinet Member for Housing and Communities arranges all Members briefings on the Statement of Community Involvement and on future changes to the planning process as prescribed by legislation.

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