

**Time and Date**

2.00 pm on Tuesday, 13 December, 2022

**Place**

Council Chamber - Council House

---

**Public business**

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 5 - 12)
  - (a) To agree the minutes from the meeting of Cabinet on 15 November, 2022
  - (b) Matters arising
4. **Exclusion of Press and Public**

To consider whether to exclude the press and public for the item(s) of private business for the reasons shown in the report(s).
5. **Biodiversity Net Gain Supplementary Planning Document - Adoption**  
(Pages 13 - 72)

Report of the Director of Streetscene and Regulatory Services
6. **New Residential Buildings Design Guide Supplementary Planning Document (SPD) - Adoption** (Pages 73 - 222)

Report of the Director of Streetscene and Regulatory Services
7. **Tall Buildings Design Guide and Three Spires View Management Framework Supplementary Planning Document SPD) - Adoption** (Pages 223 - 300)

Report of the Director of Streetscene and Regulatory Services
8. **2023/24 Pre Budget Report** (Pages 301 - 320)

Report of the Chief Operating Officer (Section 151 Officer)

9. **2022/23 Second Quarter Financial Monitoring Report** (Pages 321 - 346)  
Report of the Chief Operating Officer (Section 151 Officer)
10. **Council Tax Premiums for Empty Properties and Second Homes** (Pages 347 - 354)  
Report of the Chief Operating Officer (Section 151 Officer)
11. **Approval of Rough Sleeper Drug and Alcohol Treatment Grant 2022-2024**  
(Pages 355 - 362)  
Report of the Director of Public Health and Wellbeing
12. **Public Realm - Phase 6** (Pages 363 - 372)  
Report of the Director of Transportation and Highways
13. **Adult Social Care Preventative Support Grants** (Pages 373 - 402)  
Report of the Director of Adult Services and Housing
14. **Refugee Resettlement and Newly Arrived Communities** (Pages 403 - 422)  
Report of the Chief Partnership Officer
15. **Outstanding Issues**  
There are no outstanding issues
16. **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**

17. **Refugee Resettlement and Newly Arrived Communities** (Pages 423 - 450)  
Report of the Chief Partnership Officer  
  
(Listing Officer: P Barnett – [peter.barnett@coventry.gov.uk](mailto:peter.barnett@coventry.gov.uk))
18. **Any other items of private business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

---

Julie Newman, Chief Legal Officer, Council House, Coventry

Monday, 5 December 2022

Note: The person to contact about the agenda and documents for this meeting is Lara Knight, Governance Services, Email: [lara.knight@coventry.gov.uk](mailto:lara.knight@coventry.gov.uk)

## Membership

### Cabinet Members:

Councillors R Brown, K Caan, G Duggins (Chair), P Hetherington, 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, G Lloyd and S Nazir

### By invitation:

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

## **Public Access**

Any member of the public who would like to attend the meeting in person is encouraged to contact the officer below in advance of the meeting regarding arrangements for public attendance. A guide to attending public meeting can be found here: <https://www.coventry.gov.uk/publicAttendanceMeetings>

**Lara Knight, Governance Services,  
Email: [lara.knight@coventry.gov.uk](mailto:lara.knight@coventry.gov.uk)**

This page is intentionally left blank

# Agenda Item 3

## Coventry City Council

### Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 15 November 2022

Present:

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

Non-Voting Deputy  
Cabinet Members: Councillor P Akhtar  
Councillor B Gittins  
Councillor G Lloyd  
Councillor S Nazir

Non-Voting Opposition  
Members: Councillor P Male  
Councillor G Ridley

Other Non-Voting  
Members: Councillor J Clifford  
Councillor R Lakha  
Councillor K Maton

Employees (By Service)

Chief Executive M Reeves (Chief Executive)

Communications N Hart

Finance B Hastie (Chief Operating Officer (Section 151 Officer)),

Law and Governance O Aremu, S Bennett

Property Services and  
Development R Moon (Director), A Hunt

Streetscene and  
Regulatory D Butler

Transportation and  
Highways D Pipe, J Seddon

Apologies: Councillors N Akhtar, L Bigham, G Hayre and R Singh

## Public Business

### 48. **Declarations of Interest**

There were no disclosable pecuniary interests.

### 49. **Minutes**

The Minutes of the meeting held on 11 October, 2022 were agreed and signed as a true record.

There were no matters arising.

### 50. **Exclusion of Press and Public**

**RESOLVED that the Cabinet agrees to exclude the press and public under Sections 100(A)(4) of the Local Government Act 1972 relating to the private report in Minute 56 below headed “City Centre South Funding and Delivery” on the grounds that the report involves the likely disclosure of information contained in Paragraph 3 of Schedule 12A of the Act, as it contains information relating to the financial affairs of a particular person (including the authority holding that information) and in all circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.**

### 51. **Coventry Transport Strategy**

The Cabinet considered a report of the Director of Transportation and Highways which that indicated that the City Council has developed a new Coventry Transport Strategy which sets out a long-term (15 year) vision for the way that people and goods will travel to, from and around the city in the future. The Strategy, which was appended to the report, aims to bring about a fundamental change by creating a city where it is easy, convenient and safe to walk, cycle and travel on public transport and where most people do not need to use a car to access the services that they need for day-to-day life.

This change will directly support many of the Council’s wider objectives, as set out in the emerging One Coventry Plan. These include increasing economic prosperity, improving outcomes and tackling inequalities, reducing adverse impacts upon the environment, health and wellbeing and tackling the causes and consequences of climate change.

The Strategy has also been developed alongside the West Midlands Combined Authority (WMCA) Local Transport Plan (LTP) for the region, which is expected to be adopted in early 2023. The Coventry Transport Strategy therefore aims to deliver Coventry’s local priorities, while also meeting the ambitions of the wider region, for example in relation to economic growth and tackling climate change.

Cabinet has previously (October 2021) considered this Strategy in draft form (Minute 34/21 refers). Since then, the Council has carried out a public consultation and has engaged further with key stakeholders (including WMCA). The results of

the consultation were largely positive, with stakeholders and the majority of residents supporting both the Strategy's overall vision and most of the individual measures included in it. However, while most of the Strategy is unchanged from the previous draft, some amendments have been made in response to residents and stakeholders feedback. Further details of the responses received were appended to the report.

The Strategy is supported by an accompanying Implementation Plan, also appended to the report, which provides details of the specific transport improvements that we, and our partners, will deliver to implement the Strategy. The Implementation Plan is focused primarily on the first five years of the Strategy (2022/23 – 2026/27). This is the period covered by the City Region Sustainable Transport Settlement (CRSTS), through which £80 million has been allocated to transport schemes in Coventry.

Cabinet previously received a more detailed report on the CRSTS programme in August 2022 (Minute 20/22 refers). The Implementation Plan incorporates these schemes alongside others that are expected to be funded via other sources.

**RESOLVED that the Cabinet recommends that Council:-**

- 1. Approves the Coventry Transport Strategy, as appended to this report, and the adoption of the Strategy as part of the Council's formal Policy Framework.**
- 2. Delegates authority to the Director of Transportation and Highways, following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change, and the Cabinet Member for City Services (and in respect of the implementation and scope of individual projects, the relevant Ward Councillors), to take the necessary measures to deliver the Transport Strategy and Implementation Plan, as appended to this report.**

## **52. Local Plan Review**

The Cabinet considered a report of the Director of Streetscene and Regulatory Services which indicated that the Coventry Local Plan was adopted in 2017. The Council is obliged to consider whether the Plan needs reviewing every five years. This consideration is based on whether the Plan has been effective in meeting the policy objectives it set out, whether there have been substantive policy changes at a local or national level, or whether there has been a significant change in the housing need.

Given that the Government's "Standard Method" for calculating Housing Need was introduced after the adoption of the current Plan it is considered that a significant change has occurred. Furthermore, a comprehensive review of the policies in the Plan will give an opportunity to ensure greater consideration of environmental issues as well as wider national changes.

It is therefore proposed to conduct a full review of the Local Plan, and an indicative timeline is included as part of a refreshed Local Development Scheme 2022-25, a copy of which was appended to the report. Adoption of a reviewed Local Plan is

anticipated to take place in early 2025 and an indicative timeline was detailed in the report.

**RESOLVED that Cabinet :-**

- 1) Notes the timeline indicated in the Report**
- 2) Adopts the draft Local Development Scheme 2022-2025.**
- 3) Recommends that Council approves the commencement of a full Local Plan Review.**

**53. City Centre South Funding and Delivery**

The Cabinet considered a report of the Director of Property Services and Development which indicated that the City Centre South scheme will deliver transformational improvements to Coventry City Centre through new homes, jobs, commercial and leisure opportunities and high quality public spaces. The report sought formal approval to the next stage of the project (following the previous Council approval in January 2022 to proceed with the making of the Compulsory Purchase Order).

A corresponding private report detailing confidential financial matters was also submitted for consideration (Minute 56 below refers).

The Council's development partner, Shearer Property Regen Ltd (SPRL), have appointed Hill Holdings Limited as the funding partner for the Scheme under the terms of the Development Agreement entered into between the Council, SPRL and Shearer Property Group (SPG) in 2019. The Council are working with the developer to optimise the Scheme and an application to make a number of refinements to the Outline Planning Permission for the Scheme will be submitted to the Local Planning Authority shortly.

The parties are also working together to agree variations to the Development Agreement to reflect the Scheme refinements and the commercial terms of both the Council and development partner. Whilst deliverability is being optimised through design and contractual changes, where a viability gap remains the developer has a right under the Development Agreement to make a request of the Council to bridge that financial gap, in order to make the scheme financially viable. The Council has no obligation to agree to such a request; however, it is recommended that the Council resolves to provide financial support to the project in order to secure delivery.

This report, therefore, seeks formal approval to utilise funding awarded to the Council by the West Midlands Combined Authority (WMCA), as well as some additional Council resources, to provide additional funding support for the Scheme and to make changes to the Development Agreement to enable the delivery of the Council's key regeneration priority for the city, delivering important new homes, hundreds of new jobs and a step change in the quality of the city centre.

The Scheme will deliver a range of transformational benefits for the people of Coventry. The proposed refinements to the Scheme will lead to up to 1,500 new

homes (an increase from 1,300 new homes), new retail, employment, health care and leisure space resulting in a new sustainable city centre community whilst still retaining a mixed use approach. As well as these quantitative benefits, the delivery of the Scheme will realise a significant number of qualitative benefits that will benefit local residents and businesses, which include:

- An increased diversity in city centre uses, through the delivery of residential units (including different tenures), mixed retail and leisure spaces and new public realm provisions.
- An active, attractive and inclusive evening economy, as a result of the provision of a more varied commercial offer which will lead to a more socially inclusive place.
- Improved attractiveness of the city centre as a business location, through attraction of talent to the area and better linkages to the city's existing business district.
- Improved connectivity across the city centre through the proposed public realm works and new pedestrian and cycle linkages.
- A more active and varied cultural offer, through the diverse range of leisure and retail uses proposed under the new scheme
- Improved perception of the city centre, through its transformation into an exciting and thriving location in which to live and work. This will not only encourage local visitors but will also increase tourism.
- Changed perception of Coventry as a place to live, work, visit and study due to the vibrant and successful mixed-use environment.
- Improved local and regional economic and commercial regeneration by the Scheme acting as a stimulus for further private sector investment due to an enhanced economic sentiment around the city centre.

As has been the case since the Scheme's inception, bringing forward a complex city centre regeneration scheme like CCS and delivering the range of benefits outlined above has required financial viability challenges to be overcome. The £98.8m WMCA grant funding acknowledged the reality of the "market failure" in this part of Coventry and the economics associated with bringing forward a city centre scheme of this nature. This has been reinforced through the recent WMCA Investment Board Decisions to both continue to allow the full utilisation of the grant funding and to reprofile some elements to support Scheme cashflow.

Additionally, the Outline Planning Permission for the Scheme acknowledged that the delivery of affordable housing in that Scheme was not financially viable and no affordable housing was proposed at that stage. However CCC, WMCA and SPRL all wish to see a refined Scheme including affordable housing to ensure a diverse and vibrant community and to offer opportunities to Coventry residents seeking an affordable home in the city centre. The refined Scheme is therefore looking to include up to 20% affordable housing, subject to viability re-appraisal.

A financial re-appraisal of the refined Scheme indicates that even after a full utilisation of those elements of the WMCA grant available to the developer a viability gap remains. Accordingly, substantially in accordance with the provisions of the Development Agreement (DA), SPRL have requested that a contribution of up to £32.75m of funding is committed by the Council to help facilitate delivery of the Scheme. The proposed Council funding of the Scheme includes utilisation of £28.7m of the WMCA grant which is awarded to the Council as compensation for

its loss of existing land interests in the CCS area and which the Council is willing to see recycled into supporting Scheme delivery.

Alongside the Council's advisers, Deloitte (Commercial Advisors) and WTP (Cost Consultants), the Council has been undertaking due diligence on the refined Scheme to analyse and refine the costs, values and target return adopted within the appraisal and the Council is satisfied that SPRL's financial appraisal as refined by this process is robust and satisfactory. Furthermore, the Council's commercial advisors Deloitte have confirmed that an additional funding contribution from the Council to close the Viability Gap is justified and required in order to deliver the Scheme.

As the Council enters the next stage of the project, there is a need to continue working with advisors to have support at the CPO inquiry, due to take place in January 2023, and to provide the Council with the legal and commercial expertise needed to deliver the project.

**RESOLVED that Cabinet:-**

- 1) Delegates authority to the Director of Property Services and Development, following consultation with the Chief Operating Officer (Section 151 Officer), the Director of Law and Governance, the Cabinet Member for Jobs, Regeneration and Climate Change, the Cabinet Member for Strategic Finance and Resources and the Cabinet Member for Housing and Communities to undertake the necessary due diligence and approve the terms of the Scheme funding and, thereafter, enter into any associated legal agreements and undertakings that are necessary to give effect to the recommendations within this report.**
- 2) Approves, in principle, the proposed Variations to the Development Agreement between the Council, Shearer Property Regen Ltd and Shearer Property Group.**
- 3) Delegates authority to the Director of Property Services and Development, following consultation with the Chief Operating Officer (Section 151 Officer), the Director of Law and Governance, the Cabinet Member for Jobs, Regeneration and Climate Change, the Cabinet Member for Strategic Finance and Resources and the Cabinet Member for Housing and Communities to undertake the necessary due diligence and approve and enter into the legal agreements and undertakings necessary to give effect to Recommendation 2) above.**
- 4) Recommends that the Council approves the use of up to £32.75m to support the delivery of the Scheme and £1.2m to fund Project Support and Monitoring Costs (£28.7m of which is to be funded from the West Midlands Combined Authority City Centre South grant and £5.25m from Capital receipts to provide the remaining gap funding for the Scheme and Scheme Project Support and Monitoring Costs).**

54. **Outstanding Issues**

There were no outstanding issues.

55. **Any Other Items of Urgent Public Business**

There were no other items of urgent public business.

**Private Business**

56. **City Centre South Funding and Delivery**

Further to Minute 53 above, the Cabinet considered a private report of the Director of Property Services and Development which set out the commercially confidential matters relating to proposals for the next stage of the City Centre South scheme, which will deliver transformational improvements to Coventry City Centre through new homes, commercial and leisure opportunities and high quality public spaces.

**RESOLVED that Cabinet:-**

- 1) **Delegates authority to the Director of Property Services and Development, following consultation with the Chief Operating Officer (Section 151 Officer), the Director of Law and Governance, the Cabinet Member for Jobs, Regeneration and Climate Change, the Cabinet Member for Strategic Finance and Resources and the Cabinet Member for Housing and Communities to undertake the necessary due diligence and approve the terms of the Scheme funding and, thereafter, enter into any associated legal agreements and undertakings that are necessary to give effect to the recommendations within this report.**
- 2) **Approves, in principle, the proposed Variations to the Development Agreement between the Council, Shearer Property Regen Ltd and Shearer Property Group.**
- 3) **Delegates authority to the Director of Property Services and Development, following consultation with the Chief Operating Officer (Section 151 Officer), the Director of Law and Governance, the Cabinet Member for Jobs, Regeneration and Climate Change, the Cabinet Member for Strategic Finance and Resources and the Cabinet Member for Housing and Communities to undertake the necessary due diligence and approve and enter into the legal agreements and undertakings necessary to give effect to Recommendation 2) above.**
- 4) **Recommends that the Council approves the use of up to £32.75m to support the delivery of the Scheme and £1.2m to fund Project Support and Monitoring Costs (£28.7m of which is to be funded from the West Midlands Combined Authority City Centre South grant and £5.25m from Capital receipts to provide the remaining gap funding for the Scheme and Scheme Project Support and Monitoring Costs).**

57. **Any Other Items of Urgent Private Business**

There were no other items of urgent private business.

(Meeting closed at 2.20pm)



---

Cabinet Member for Housing and Communities

13 December 2022

**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:**

Biodiversity Net Gain Supplementary Planning Document - Adoption

---

**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

---

**Executive Summary:**

This report seeks to adopt the Biodiversity Net Gain Supplementary Planning Document (SPD) following public consultation which was undertaken between 06 July 2022 to 17 August 2022.

SPDs add further detail to the policies in the development plan but cannot introduce new policy. SPDs provide additional guidance for development and are capable of being a material consideration when making decisions on planning applications.

Increasing the sustainability credentials of the city by promoting biodiversity over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. Biodiversity Net Gain is an approach to development that aims to leave the natural environment in a measurably better state than it was beforehand. From 2023, the Environment Act 2021 will require a minimum of 10% gain as a result of all developments, managed for a minimum of 30 years. The aim of this SPD is to facilitate the delivery of Biodiversity Net Gain as set out in the Environment Act.

The additional guidance provided within the SPD outlines how developments can achieve Biodiversity Net Gain, both through established methods on and off site and other financial mechanisms. This includes outlining relevant policy and legislation. Responses to the consultation have been analysed and taken account of when amending the SPD. The proposed final version is attached at Appendix 1, and a summary of representations along with responses and proposed amendments can be seen at Appendix 2.

**Recommendations:**

1. That Cabinet adopts the Biodiversity Net Gain Supplementary Planning Document (SPD)
2. That Cabinet delegates to the Strategic Lead (Planning) in consultation with the Cabinet Member for Housing and Communities any necessary further non-substantive (minor) changes to the document

**List of Appendices included:**

Appendix 1: Biodiversity Net Gain Supplementary Planning Document.

Appendix 2: Consultation: summary of representations and responses

Appendix 3: Strategic Environmental Assessment Screening Report

Appendix 4: Equalities Impact Assessment

**Background papers:**

None.

**Other useful documents:**

Local Plan: adopted December 2017

National Planning Policy Framework July 2021

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

Yes – Scrutiny Board 4, 07 July 2022

**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: Draft Affordable Housing Supplementary Planning Document

### 1. Context (or background)

- 1.1 The National Planning Policy Framework (NPPF) defines Supplementary Planning Documents (SPDs) as 'documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues.... Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan'.
- 1.2 Delivering sufficient biodiversity enhancement over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan ('the development plan'). The aim of this SPD is to facilitate the delivery of biodiversity net gain as set out in the plan and in compliance with the most up to date national policy as set out in the Environment Act 2021.
- 1.3 DEFRA's revised UK Biodiversity Indicators 2021 defines biodiversity as "the variety of all life on Earth. It includes all species of animals and plants, and the natural systems that support them. Biodiversity matters because it supports the vital benefits we get from the natural environment. It contributes to our economy, our health and wellbeing, and it enriches our lives". Across the country biodiversity is being lost and it is accepted that this loss must be reversed before the impact becomes unsustainable.
- 1.4 Biodiversity Net Gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.
- 1.5 Under the Environment Act 2021, planning permissions granted in England will have to deliver at least 10% biodiversity net gain from an as yet unconfirmed date (expected to be in November 2023). Biodiversity Net Gain will be measured using DEFRA's biodiversity metric and this net gain must be protected for at least 30 years.
- 1.6 Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. This includes a minimum statutory public consultation period of four weeks: the Council's recently adopted Statement of Community Involvement however sets out a local standard that SPDs should be consulted on for six weeks. Consultation for this report took place between 06 July 2022 to 17 August 2022.
- 1.7 It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. The screening opinion undertaken is attached at Appendix 3. This concludes that no SEA is needed as the SPD elaborates on existing policy. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. The screening report was made publicly available for comment at the same time as the SPD was being consulted on.

- 1.8 Finally, an Equalities Impact Assessment (EIA) been undertaken, this is attached at Appendix 4 and was publicly consulted on.
- 1.9 Responses have been analysed and the SPD amended accordingly. In line with the legislation, this Cabinet report will include a statement setting out the details of the consultation, a summary of the main issues raised and how they have been addressed. This is contained at section 3 and Appendix 2 of this Cabinet report.

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

- 2.1 Cabinet may wish for the Council to rely upon the Environment Act, the current Local Plan policies, and the National Planning Policy Framework. However, this would not honour the commitment of the adopted Local Plan to replace the outdated guidance and would mean the council is primarily reliant upon Local Plan and national policy without any further clarification which also reflects the local context. Therefore, this option is not recommended.
- 2.2 The recommendation is to adopt a new Biodiversity Net Gain SPD, as per Appendix 1, This approach is recommended in order to ensure Council guidance reflects National Policy as outlined in the 2021 Environment Act. This will accurately reflect the adopted Local Plan and subsequent changes to national policy and ensure delivery in accordance with local need.

## **3 Results of consultation undertaken**

- 3.1 Public consultation was undertaken between 06 July 2022 to 17 August 2022. The minimum statutory period for SPD consultations is four weeks, the council's Statement of Community Involvement recommends six weeks.
- 3.2 The council made all consultation documentation available on its website and in hard copy at the Council House and all libraries. A notification email was sent to all consultees on the planning policy consultation database which provided background to the SPD consultation and explained where people could view the documents and the various ways in which they could provide comments. The council also used its social media platforms and local press to publicise the consultation.
- 3.3 Regulation 12 of the Local Planning Town and Country Planning (Local Planning) (England) Regulations 2012 states that, before a local planning authority can adopt an SPD it must first prepare a statement setting out the persons consulted during the preparation of the document, with a summary of the main issues raised and how they have been addressed in the SPD. This report addresses these requirements, and details of the comments submitted, the officer response and changes made to the SPD as a result can be viewed at Appendix 2.
- 3.4 Alongside the SPD, the SEA screening opinion and Equality Impact Assessment were made available for public comment as set out in section 1 of this report. In terms of the SEA screening, the statutory consultation bodies Natural England and Historic England concurred with the council's view that Strategic Environmental Assessment is not required. The Environment Agency did not respond. The screening assessment at Appendix 3 has been updated to reflect this conclusion. The Equality Impact Assessment at Appendix 4 has been updated as a result of internal guidance although no external responses were received on the matter.

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

- 4.1 The SPD can be adopted as soon as practicable.

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

- 5.1 Financial implications

There are no financial implications associated with this report.

- 5.2 Legal implications

- 5.1 There are no direct implications as a result of this report. Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) also require the Council to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken.

#### **6 Other implications**

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

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 document focuses upon supporting local communities by creating an attractive, cleaner and greener city and enhancing the quality of public spaces.

- 6.2 How is risk being managed?

There are no risks associated with this report.

- 6.3 What is the impact on the organisation?

No direct impact.

- 6.4 Equalities Impact Assessment EIA

A full Equality and Impact Assessment (EIA) 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). The Supplementary Planning Document elaborates on Local Plan policy and so a further EIA has been undertaken (Appendix 4).

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

The nature of SPD is inherently environmental. The promotion of biodiversity and enforcement of long term, significant biodiversity net gain will enhance the prioritisation of green spaces and the natural environment. The enhancement of green spaces will have numerous environmental benefits that reduce the impacts of climate change, such

as improving drainage and reducing flood risk, air pollution and the urban heat island effect.

#### 6.6 Implications for partner organisations?

The Supplementary Planning Document will provide further detail to the adopted Local Plan policy which will assist those organisations involved in the delivery of biodiversity net gain.

#### Report author:

#### Name and job title:

Beth Taylor

Ecology and Biodiversity Officer (Planning Policy)

Simon Newell

Ecology and Biodiversity Manager (Planning Policy)

#### Service

Streetscene and Regulatory Services

#### Tel and email contact:

Tel:

Email: [beth.taylor@coventry.gov.uk](mailto:beth.taylor@coventry.gov.uk)

Enquiries should be directed to the above person.

This report is published on the council's website:

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

Contributor/ approver name	Title	Service	Date doc sent out	Date response received or approved
<b>Contributors:</b>				
Usha Patel	Governance Services Officer	Law and Governance	26/10/2022	31/10/2022
David Butler	Head of Planning Policy & Environment	Streetscene and Regulatory Services	26/10/2022	26/10/2022
Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	26/10/2022	08/11/2022
<b>Names of approvers for submission: (officers and members)</b>				
Cath Crosby	Lead Accountant, Business Partnering,	Finance	26/10/2022	08/11/2022
Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	26/10/2022	03/11/2022

Andrew Walster	Director of Street Scene and Regulatory Services	-	26/10/2022	02/11/2022
Councillor D Welsh	Cabinet Member for Housing and Communities	-	15/11/2022	22/11/2022

This page is intentionally left blank



**Coventry City Council**  
**Biodiversity Net Gain**  
Supplementary Planning Document  
Consultation draft June 2022

## Table of contents

1	Introduction	3
2	Context	3
3	Relevant Policy and legislation	4
4	Achieving Biodiversity Net Gain	6
	Appendix 1: Local Plan policy GE3	<del>13</del> <sup>14</sup>
	Appendix 2: Survey Season	13
	Appendix 3: Coventry Offset sites	14
	Appendix 4: Biodiversity metric	16
	Appendix 5: Example S106 agreement	17

## 1 Introduction

### Purpose

- 1.1 Supplementary Planning Documents (“SPDs”) add further detail to policies contained within the development plan and are used to provide guidance on specific sites or particular issues. SPDs do not form part of the adopted development plan but they are a material planning consideration in decision taking.

### Aims and objectives

- 1.2 This SPD provides guidance on achieving Biodiversity Net Gain (BNG) from any new development. BNG is achieved when a development leads to an overall increase biodiversity relative to the site beforehand. This Biodiversity Net Gain SPD sets out how this can be achieved in Coventry using established methods.
- 1.3 The purpose of this SPD is to provide information regarding how developers are able to deliver BNG and what contributions may be required. The circumstances and mechanisms for providing BNG are set out including how any financial contribution will be agreed and appropriate projects delivered.
- 1.4 This SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure negotiating obligations is based on a clear and consistent approach

## 2 Context

### Biodiversity

- 2.1 “Biodiversity is the variety of all life on Earth. It includes all species of animals and plants, and the natural systems that support them. Biodiversity matters because it supports the vital benefits we get from the natural environment. It contributes to our economy, our health and wellbeing, and it enriches our lives”<sup>1</sup>
- 2.2 Across the country Biodiversity is being lost and it is accepted that this loss must be reversed before the impact becomes unsustainable<sup>2</sup>.
- 2.3 Coventry is a largely urban area but does include a number of significant wildlife sites. Community surveys in Birmingham city have found over 2,300<sup>3</sup> species of plants and animals (iNaturalist, June 2022) and the total number is likely to be significantly higher. Whilst Coventry has less volume of community biodiversity surveys than Birmingham currently, it is reasonable to assume that it will have similar biodiversity.

### Biodiversity net gain

- 2.4 Biodiversity Net Gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or

---

<sup>1</sup> UK Biodiversity Indicators 2021 Revised, DEFRA, 2021

<sup>2</sup> Biodiversity 2020: A strategy for England’s wildlife and ecosystem services, DEFRA, 2011

<sup>3</sup> [https://uk.inaturalist.org/observations?place\\_id=53760](https://uk.inaturalist.org/observations?place_id=53760)

through a combination of on-site and off-site measures. The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.

- 2.5 Developments may deliver biodiversity gain by
- a. Providing enhancements to habitats and wildlife on site
  - b. Providing enhancements to agreed sites elsewhere
  - c. Purchasing biodiversity credits
- 2.6 The required gain in the Environment Act is a minimum of 10%<sup>4</sup> with sites managed for a period of not less than 30 years. Research has shown that in practice biodiversity will continue to decrease unless development provides significantly greater gain and that sites managed for longer periods<sup>5</sup>. Coventry is developing a network of different biodiversity offset sites where net gain can be achieved cost-effectively (Appendix 3). The network will be extended as further opportunities arise.

### 3 Relevant Policy and legislation

#### National Policy Context

- 3.1 Section 40 of the Natural Environment and Rural Communities Act 2006 includes a requirement for local authorities regarding biodiversity (the Biodiversity Duty). The Environment Act 2021 (Section 102) includes a revision such that there is a new requirement to enhance biodiversity in all activities.
- 3.2 The Government's National Planning Policy Framework<sup>6</sup> has at its heart the core principle of sustainable development and set out a number of requirements related to the securing of biodiversity net gain through the planning system. The key sections of the NPPF that are relevant to biodiversity are:
- a. Section 8: healthy and safe communities
  - b. Section 15: conserving and enhancing the natural environment.
- 3.3 These sections contain important policy requirements; the following paragraphs are notable:
- 3.4 Paragraph 8c sets out that sustainable development has an environmental objective –
- 1.1.1 *“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

---

<sup>4</sup> Environment Bill 2021

<sup>5</sup> Implementation Gap between the Theory and Practice of Biodiversity Offset Multipliers, Bull, J.W. et al, Conservation Letters, 2017

<sup>6</sup> Ministry of Housing, Communities and Local Government, July 2021

- 3.5 Paragraph 102 refers to Local Green Space, areas of land with particular importance including “richness of wildlife”. Related policies should be consistent with policies for the Green Belt
- 3.6 Paragraph 174 states that through planning policy and planning decisions, the natural environment should be enhanced by ‘*minimising impacts on and providing net gains for biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures*’
- 3.7 Paragraph 179 provides specific advice on habitats and biodiversity. ~~In particular section~~ **Section b)** states that development plans should ‘*identify and pursue opportunities for securing measurable net gains for biodiversity*’.
- 3.8 Paragraph 180 relates to determining planning applications. Section a) establishes the principle that Local Authorities should refuse permission if significant harm to biodiversity cannot be avoided or properly mitigated.

National Planning Practice Guidance

- 3.9 The Government’s National Planning Policy Guidance<sup>7</sup> explains the key issues in implementing the natural environment policies. The PPG provides advice on what ecological information should be included in an application and the use of planning conditions (Paragraph 018 Reference ID: 8-018-20190721). The guidance provides a definition of net gain (Paragraph: 020 Reference ID: 8-020-20190721) and how this can be achieved (023 Reference ID: 8-023-20190721)

Local Plan policy Coventry Local Plan (2017)

3.10 **Policy DS4 (Part A): General Masterplan principles:**

- Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensatory provisions where appropriate

3.11 **Policy GE1: Green Infrastructure:**

- New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation
- Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity

3.12 **Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation** (See Appendix 1)

- Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development

<sup>7</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, July 2019

on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity

#### 4 Achieving Biodiversity Net Gain

##### Background

- 4.1 The delivery of biodiversity net gain requires that any development delivers more and better-quality biodiversity than would exist without development taking place. Applicants are expected to demonstrate how their proposals meet the policy requirements of the Local Plan by providing clear information that sets out how biodiversity will be improved.
- 4.2 To demonstrate how proposals meet policy requirements applicants should:
- Undertake an ecological assessment of the habitat and key biodiversity features of the site;
  - Use a recognised metric (see paragraph 4.12) to assess the biodiversity value of the site and the impact of the proposed development; and
  - Agree appropriate mitigation for any impact of the development by ensuring that overall the number of biodiversity units is increased.
- 4.3 All planning applications will be required to submit a biodiversity gain plan<sup>8</sup> which provides information on the site and details how biodiversity will be enhanced. The required amount of information submitted with the application will vary according to the application, see Table 1.

~~1.1.2~~ ~~Table 1: Information required by applications~~ Table 1: Biodiversity enhancement information required by applications

<del>1.1.3</del> 1.1.2 Type of application	<del>1.1.4</del> 1.1.3 Required information
<del>1.1.5</del> 1.1.4 Household or	<del>1.1.6</del> <b>No information required.</b>  Any mitigation is likely to be provided onsite through enhancements such as bat boxes, swift bricks and wildlife friendly planting.  <del>1.1.7</del> An application which includes appropriate enhancements will be preferred.
<del>1.1.8</del> 1.1.5 Minor	<del>1.1.9</del> <b>Ecological survey with metric and details of proposed mitigation.</b>  <del>1.1.10</del> 1.1.6 An application that

Formatted Table

Formatted: Space Before: Auto, No bullets or numbering

<sup>8</sup> Environment Act 2021 Schedule 14, Part 2,14

	uses the Council's planning pre-application service may be advised that full information is not required, e.g. for sites with minimal biodiversity interest.
<u>1.1.11.1.7</u> M ejer	<u>1.1.12.1.8</u> Ecological survey with metric and details of proposed mitigation

	<u>1.1.14.1.10</u> Required information
	<u>1.1.16.1.12</u> Information may be requested on a case-by-case basis.

Formatted: Heading 1, Indent: Left: 0 cm

Formatted Table

	<p><u>1.1.181.1.14</u> <u>Basic site information required; any further details are encouraged.</u></p>
	<p><u>1.1.201.1.16</u> <u>Ecological survey of the site with a Biodiversity Impact Assessment using the DEFRA metric, this could be supported by the submission of a Landscape Management Plan.</u></p>
	<p><u>1.1.221.1.18</u> <u>Revised Biodiversity Impact Assessment that reflects any changes made following the Outline Application.</u></p>

Formatted: Indent: Left: 2.87 cm, No bullets or numbering

--	--

~~1.1.23~~

~~1.1.24~~

1.1.19 Ecology information regarding net gain is independent of any information regarding legally protected species. All developments which may adversely impact on protected species (e.g. bats, badgers, great crested newts) are required to submit appropriate information with the application.

Formatted

Formatted: Indent: Left: -1.3 cm, Space Before: Auto

1.1.251.2

Formatted

Ecological surveys

4.4 To inform the net gain calculations ecological surveys should be undertaken at the appropriate time of year (see Appendix 2). The following survey information and assessment is required to complete the calculation:

- a. Area of each habitat and length of each linear feature present within the red line of the application;
- b. Habitat type according to the UK Habitat Classification<sup>9</sup> or other nationally recognised classification, including indicator species (with reference to the guidance provided by Warwickshire Habitat Biodiversity Audit);
- c. Habitat condition;
- d. Impact from development based upon current planning layout, both directly onsite, and indirectly offsite; and
- e. Onsite biodiversity mitigation and compensation measures.

4.5 The survey should include the whole of the development boundary (red line) ~~and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated.~~ On a case-by-case basis, applicants may be requested to undertake surveys of adjacent habitats, such as Local Wildlife Sites, where direct impacts are anticipated.

4.54.6 The evaluation of habitats recorded on site should be undertaken with reference to the Warwickshire and Coventry Local Wildlife Site selection criteria. Habitats that meet the selection criteria thresholds should normally be of 'County' value and of 'High or Very High distinctiveness'.

4.64.7 Habitat Condition should be assessed in accordance with the guidance provided with the relevant metric or subsequent guidelines. When assessing any habitats not covered by this guidance, developers and their advisors will be expected to apply evidence based professional judgement and submit any assessment in a written form.

<sup>9</sup> UK Habitat Classification <https://ukhab.org/>

4.74.8 If the biodiversity value of a site has been lowered by any activity after 30<sup>th</sup> January 2020<sup>10</sup> (other than with planning permission) with the resulting loss of habitats in advance of a biodiversity metric calculation being undertaken the baseline for the metric is to be taken as the habitats present prior to site clearance. The biodiversity value of the habitats lost is to be estimated based upon a desk-based assessment and professional judgement. The precautionary principle<sup>11</sup> is to be applied where the distinctiveness or condition of the habitats lost is uncertain.

#### Biodiversity Impact Assessment

4.84.9 The Warwickshire Biodiversity Impact Calculator has been established in use in Coventry for a number of years. The metric has been used for a large number of developments and led to successful biodiversity mitigation projects. The DEFRA metric is more recent and will fully replace the Warwickshire BIA and a separate version is available for small-scale developments. All new applications will use the most recent DEFRA metric. Coventry CC will accept the Warwickshire metric where this is a revision of the BIA originally submitted for a development prior to the adoption of this SPD. See Appendix 4 for further details of the available metrics.

#### Irreplaceable habitat

4.94.10 Sites which include areas of irreplaceable habitat are excepted from the BNG policies and are unable to use any metric to assess the biodiversity value of these areas. If a site does include areas of such habitat and development were acceptable a bespoke agreement with the Council regarding appropriate mitigation would be required. Any site which includes both irreplaceable habitat and other wildlife habitats should use the metric on the other habitats. The DEFRA list of irreplaceable habitats will be used.

#### Sites with low biodiversity

4.11 Certain habitats (e.g. buildings and hardstanding) are considered to have zero biodiversity value. Such sites will be expected to demonstrate an overall improvement in biodiversity in order to meet relevant Council Local Plan policies (Policy GE3). Applicants should note that brownfield sites are capable of having a biodiversity value and this should be assessed as part of the application process.

4.104.12 The Council will advise on any requirement for ecological survey and agree appropriate biodiversity enhancement sufficient to provide an overall net gain. Features such as green walls, green roofs, ~~containers and bird/bat boxes will provide appropriate benefits.~~ hedgehog-friendly fencing, hibernacula, containers and bird/bat boxes will provide appropriate benefits.

#### Agreeing mitigation

4.114.13 If an impact on an ecological asset is identified, applicants must propose how that impact will be avoided, mitigated, or compensated for in accordance with the mitigation hierarchy.

4.124.14 Where mitigation or compensation is proposed, habitat creation proposals, both on and offsite, should avoid 'down trading' of habitat value by proposing to create habitats of lower distinctiveness than those lost. Any proposed change in habitat must be agreed beforehand,

<sup>10</sup> Environment Act 2021 Schedule 14 Part 1, 6a

<sup>11</sup> "Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation" Rio Declaration on Environment and Development 1992

Formatted: Normal, No bullets or numbering

applicants are encouraged to discuss provision of alternative habitats with the Council at the earliest opportunity. It is accepted that in within the urban area of Coventry habitats such as biodiverse roofs, green walls or wildlife-friendly landscaping may provide significant benefits particularly when these are associated with other existing or planned schemes.

4.134.15 Habitat creation proposals must be additional to any existing obligations and not deliver something that would occur anyway (for example through an existing planning permission, Forestry Commission grant or Environmental Stewardship scheme).

4.144.16 All proposals to deliver Biodiversity Net Gain through on-site and off-site habitat creation must be:

- a. In compliance with forthcoming British Standard BS 8683 (Process for designing and implementing Biodiversity Net Gain) (<https://shop.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification>);
- b. Agreed in advance with the LPA;
- c. Evaluated through the use of the Biodiversity Metric;
- d. Secured by an appropriate agreement to ensure long term management;
- e. Be supported by a monitoring and management plan (adaptive management plan);
- f. Included on an offset register; and
- g. Monitored and reviewed.

#### Provision of BNG

4.154.17 Coventry City Council has sufficient biodiversity offset sites to meet the expected demand in coming years. Sites have been identified in all parts of the city and provide for the long-term creation and management of a range of different habitats. These sites will be added to the Biodiversity gain site register when this is available (anticipated Spring 2023). Developments will normally be expected to contribute any offsite mitigation required within this scheme by way of a Section 106 contribution. Alternative methods of providing adequate offset through third party schemes or the purchase of Biodiversity Credits will also be considered acceptable in principle. However, each case will be looked at and assessed on its individual merits as to the level of off-setting which will be required and accepted by the LPA.

4.164.18 In order to establish that it is feasible for on and/or off-site habitat creation/enhancement proposals to deliver a net gain for biodiversity developers will be expected to submit detailed, worked up proposals, with the expectation that sites provided within the boundary of the City.

4.174.19 Details of the design, location and extent of any habitat creation proposed will be required. Where offsite habitat creation is proposed it is particularly important that sufficient detail is submitted to reassure the Council that it is feasible that suitable provision can be delivered and maintained in the long term. Developers are encouraged to seek independent professional advice to ensure their proposals meet this requirement and are strongly recommended to make use of [the planning-Coventry City Councils'](#) Pre-application service. Any offsite mitigation would be secured by a Section 106 agreement, see Appendix 5.

4.184.20 Where compensation is targeted at a specific species, off site compensation must be delivered in an area where this species is known to occur. Desk and field-based assessments may be required to establish this

4.194.21 Where off-site habitat provision is necessary, this should be directed to the following areas, as close to the original site as possible:

- a. areas identified by the Ecological Network Map as delivering the most benefit for biodiversity (Core Areas, Corridors and Steppingstone, Restoration areas)
- b. any designated Wildlife Corridors shown in neighbourhood plans
- c. areas identified in Local Nature Recovery Strategies.

4.204.22 Habitat creation in these strategically important sites will deliver a greater benefit for biodiversity and so potentially less habitat creation will be required to achieve the same biodiversity benefits.

4.214.23 There is no requirement for compensatory habitats to be subject to public access. However public access is encouraged where this can occur without being detrimental to the value of the habitats created. All of the offset sites within the Coventry scheme include appropriate access and promote community involvement in the sites.

#### Habitat Banking

4.224.24 If a developer wishes to rely on habitat created by a Habitat Bank, this habitat would usually be in place in advance of a planning application being submitted. Habitat banking is an instrument that can be used to deliver compensation by implementing and pooling compensatory measures in advance of a development, enabling developers to purchase credits from established compensation schemes (habitat banks) to offset their impacts. Credits in the context may be earned through measures to conserve both habitats and species.

4.234.25 Any application which provides an excess of biodiversity units within a development may use these to offset any future projects within Coventry within a two-year period. Any such approach must be agreed beforehand with the LPA with information regarding future development projects provided. Future developments would need to provide an appropriate impact assessment and offset any excess biodiversity loss. Developments are not able to use potential future projects to offset current proposals.

#### Biodiversity Net Gain and stacking/additionality

4.244.26 Where biodiversity enhancements are required for other purposes (e.g., protected species schemes) these projects will not contribute to BNG offset. For such projects to contribute to BNG they will have to demonstrate additional benefits which are above and beyond any required by other schemes.

## Appendix 1: Local Plan policy GE3

### 1.1 Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation

1. Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:
  - a) lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;
  - b) protect or enhance biodiversity assets and secure their long-term management and maintenance;
  - c) avoid negative impacts on existing biodiversity; and
  - d) preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans
2. Where this is not possible, adequate mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, but only in exceptional circumstances.
3. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, ancient and newly planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage. In the case of archaeological remains, all practical measures must be taken for their assessment and recording in accordance with Policy HE2.

- 1.2 Planning legislation places a biodiversity duty of care on all local and public authorities, emphasising that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their area. These characteristics include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics, the Council will continue to assess the potential to sustain and enhance these resources.
- 1.3 Connectivity between sites and buildings, and resilient and robust ecosystems, which are adaptable to change, are essential to ensure retention of existing levels of biodiversity and to enable these to be enhanced wherever possible. As part of new developments this could be achieved through well designed gardens, green roofs or landscape features. Resilient and functioning ecosystems support

a range of human population needs, including flood management, control of atmospheric pollution, and access to green space.

- 1.4 In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city and connected corridors linking sites. Green infrastructure planning and implementation can contribute strongly to fulfilling this. Biodiversity will be promoted as a core component of sustainable development and landscapes for living, underpinning social, health, environmental and economic benefits, together with community well-being and local quality of life.
- 1.5 All development proposals will be expected to avoid negative impacts on existing biodiversity. Where this is not possible, mitigation measures should be identified, if these are not possible on site, then these should be offset elsewhere as a compensatory measure, but only in exceptional circumstances. Such circumstances may include the comprehensive delivery of a planned strategic allocation in accordance with a Council approved Masterplan. In all such cases though, compensatory provisions should be made as close to the original site as possible. In this instance development proposals should be guided by the Council's approach to biodiversity offsetting as set out in the Green Infrastructure Strategy, or any subsequent update to this document and national policy. In all instances, the long-term management and maintenance of ecological features must be demonstrated. In order to assist in ecological assessments, the Warwickshire Biological Records Centre should be consulted.

DRAFT

## Appendix 2: Survey Season

Table derived from 'Protected species and development: advice for local planning authorities' from

2.0.12.2.1 Natural England and Department for Environment, Food & Rural Affairs

Formatted: Indent: Left: -1.3 cm

Key survey period	
Other survey period	

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Habitats/Vegetation												
Badgers												
Bats Hibernation Roosts												
Bats Summer Roosts												
Bats Foraging/Commuting												
Birds Breeding												
Birds Over Wintering												
Dormice												
Great-Crested Newts												
Otters												
Reptiles												
Water Voles												
White-Clawed Crayfish												

Formatted Table

2.0.2 Formatted: Indent: Left: -1.3 cm

2.0.3 Formatted: Centered

Formatted Table

Formatted: Centered









## Appendix 4 – Biodiversity metric

- 1.1 The change in biodiversity due to development is calculated using the most recent version of the DEFRA metric. The Warwickshire Metric will be accepted for older applications where this metric was submitted.

### DEFRA metric

- 1.2 'Biodiversity Metric 3.0 can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for terrestrial and/or intertidal habitats. It will be this metric that underpins the Environment Bill's provisions for mandatory biodiversity net gain in England, subject to any necessary adjustments for application to major infrastructure projects.'
- 1.3 The metric provides a value for the biodiversity value of a site before development and the result of habitats lost and created during development. The metric shows what areas of replacement habitat must be created to offset any loss and considers the location of any offset. The metric does not include any financial estimates
- 1.4 The metric can be freely downloaded (current version 3.1, April 2022):

<http://publications.naturalengland.org.uk/file/6242570327031808>

## Appendix 5: Example Section 106 agreement

**Biodiversity Contribution:** means the sum of [XXXXX] payable to the Council towards the enhancement of biodiversity within the area ecologically connected to the Development;

**Commencement of Development:** means the carrying out in relation to the Development of any material operation as defined by section 56(4) of the Act (and the phrase “Commence Development” shall be construed accordingly) [but disregarding for the purposes of this deed and for no other purpose, the following operations: site clearance; ground investigations; site survey works; temporary access construction works; archaeological investigation; and erection of any fences and hoardings around the Land];

1. Biodiversity Contribution
  - a. The Owner covenants to pay to the Council the Biodiversity Contribution on or before Commencement of Development.
  - b. The Owner will not Commence Development until the Biodiversity Contribution has been paid to the Council.

### Example biodiversity loss schedule

**Biodiversity Impact Assessment:** Means the use of the most current and locally adopted Defra Biodiversity Offsetting Metric to calculate the biodiversity impact of the scheme measured in Biodiversity Units;

**Biodiversity Loss:** Means a negative Biodiversity Unit score;

**Biodiversity Offsetting Scheme:** Means a scheme which will deliver biodiversity enhancements which shall not be less than the Biodiversity Impact Assessment score;

**Biodiversity Unit:** Means the product of the size of an area, and the distinctiveness and condition of the habitat it comprises to provide a measure of ecological value;

**Defra Biodiversity Offsetting Metric:** Means the Defra mechanism to quantify impacts on biodiversity that allows biodiversity losses and gains affecting different habitats to be compared and ensure offsets were sufficient to compensate for residual losses of biodiversity;

**Ecology Contribution:** Means the sum payable in accordance with Schedule 1;

## **1 ECOLOGY CONTRIBUTION**

The Owner covenants as follows;

- 1.1 The approved application shall not result in a Biodiversity Impact Assessment score greater than – (xx) Biodiversity Units or such other number as may be agreed with the Council
- 1.2 Prior to the Commencement of Development, the Owner shall submit a Biodiversity Offsetting Scheme to the Council for its approval in writing.
- 1.3 The Owner shall not Commence Development until a Biodiversity Offsetting Scheme has been submitted to and approved in writing by the Council.
- 1.4 The Biodiversity Offsetting Scheme shall be approved by the Council with the purpose of ensuring that the Development does not result in a Biodiversity Loss in accordance with the National Planning Policy Framework
- 1.5 The Scheme shall include a management plan for the provision and maintenance of offsetting features on the Land for not less than 30 years from the date of implementation. Where the offsetting features do not fully offset the (-xx) Biodiversity Units the residual loss shall be offset by a fixed sum contribution to the Council assessed using an agreed Biodiversity Impact Assessment metric;
- 1.6 The Biodiversity Offsetting Scheme shall provide for one of the following:
  - 1.6.1 Confirmation that an area of land has been made available to offset a maximum of -xx Biodiversity Units of Biodiversity Loss on the Land; or
  - 1.6.2 Where no land has been made available, provide for a fixed sum contribution to be paid to the Council. The sum shall not exceed £(xx.xx) and the Council will use the contribution to enhance and secure the long-term management of biodiversity of sites within the [DETAILS OF AREA WITHIN WHICH THE CONTRIBUTION IS TO BE USED]. or
  - 1.6.3 The required number of Biodiversity Credits have been purchased
- 1.7 Once the Biodiversity Offsetting Scheme has been implemented, the Owner shall not carry out any changes to the Biodiversity Offsetting Scheme without the written consent of the Council.

Draft Biodiversity gain SPD December 2021

## Coventry Biodiversity Net Gain SPD Consultation Summary

Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change
BNG1	Coventry Society	Para 3.9, 4.1, 4.3	The SPD should clarify whether BNG requirements are established at Outline or Full application stage.	Comment noted. The SPD, within Section 4, will be amended to specify that how BNG is outlined in the planning application process. This amendment will note that this is an established system which allows for flexibility and recognises that proposals will evolve through the design stage and accordingly mitigation or compensation mechanisms will also need to evolve.	Add a paragraph specifying the application process and BNG requirements within this.
BNG2	Coventry Society	Para 2.3	The SPD should illustrate the Coventry Offset sites, perhaps with a map.	Appendix 3: Coventry Offset sites 1.1, shows a list of sites that have already been identified, however work is underway on a more comprehensive list of sites.	None.
BNG3	Coventry Society	Para 2.4 Appendix 1: Local Plan policy GE3	The SPD should prioritise BNG on-site or within a very short distance.	The SPD states 'The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.' However, to clarify this, Para 4.20 will be changed from 'Where off-site habitat provision is necessary, this should be directed to the following areas:' to 'Where off-site habitat provision is necessary, this should be directed to the following areas as close to the original site as possible:'	Adjust 4.20 as outlined.
BNG4	Coventry Society	Para 2.6, 4.18	SPD should clarify how a 30-year management requirement will be enforced.	The SPD states 'Where offsite habitat creation is proposed it is particularly important that sufficient detail is submitted to reassure the Council that it is feasible that suitable provision can be delivered and maintained in the long term'. In addition, section 1.5 in Appendix 5, further ensures this management in a legally enforced 106 Agreement.	None.

Coventry Biodiversity Net Gain SPD Consultation Summary

BNG5	Historic England	-	No Comment	-	None.
BNG6	Claremont	Para 2.6, 4.1	SPD should acknowledge that the 10% minimum net gain requirement from the Environment Act, is not required to be delivered on every site until November 2023 and therefore identify transitional arrangements.	The SPD references the Environment Act within its footnotes so that any clarification required upon reading may be found within the Act document. The SPD does not specify this requirement as one that is currently enforced, instead stating 'The delivery of biodiversity net gain requires that any development delivers more and better-quality biodiversity than would exist without development taking place.'	None.
BNG7	Claremont	Para 3.9, 4.1, 4.3, 4.18	SPD should clarify whether discussions of habitat mitigation and compensation should take place as part of pre-application discussions or take place during the planning application process. If the Council intends for discussions around habitat mitigation and compensation to be undertaken at the pre-application stage, this should be clarified within the SPD but recognising that this should not be a mandatory requirement as these can also be agreed as part of the determination of the planning application. The SPD must ensure that planning permissions provide the opportunity to secure the necessary compensation but adopt a flexible approach as the principle and mechanism will need to be secured at outline stage, but with recognition that proposals will evolve through the design stage and accordingly mitigation or compensation mechanisms will also need to evolve.	Comment noted. Para 4.18 states that the planning pre-application service is strongly recommended to meet the habitat creation requirements, but this is not a mandatory requirement. To clarify this, 4.18 will be adjusted from 'the planning Pre-application Service' to 'Coventry City Councils' Pre-Application Service'.	Adjust 4.18 as outlined.
BNG 8	Claremont	Para 4.15	The SPD should note that including developments on an 'offset register' are only required through the Environment Act where there is off-site delivery and that there is no requirement to record on-site net gain delivery, despite this being an ambition of Natural England.	Comment noted. To get the best information regarding BNG throughout Coventry, the Council and SPD will align with Natural England's' ambition and incorporate on-site net gain into its recordings.	None.

## Coventry Biodiversity Net Gain SPD Consultation Summary

BNG9	Claremont	Para 4.12 – 4.20 Appendix 3 1.1.	The SPD should not be published until the 'offset register' is produced as the Council will be unable to provide an up-to-date record of offset sites.	Comment noted. Appendix 3: Coventry Offset sites 1.1, shows a list of sites that have already been identified, there is no requirement to add a more comprehensive list within this SPD. Any future lists will be a dynamic and evolving register.	None.
BNG10	Claremont	Para 4.16	The SPD should clarify how 'expected demand' has been estimated, whether it has just accounted for allocated sites, or whether any allowance has been made for windfall developments additionally.	Demand has been assessed through the 2017 Local Plan.	None.
BNG11	Claremont	Para 4.16	The SPD should clarify how the Council has calculated the need for offsetting, as some sites will be able to deliver BNG onsite, but there is a risk that the Council could be over-reliant on this. The Council must recognise the importance of maintaining an adequate supply of sites for off-setting to ensure that this will not delay potential developments.	While the SPD states that the Council has sufficient sites for future demand, the SPD also states that there are alternative methods of offsetting including through third party schemes or the purchase of Biodiversity Credits, and therefore should land become an issue, alternatives will be made available to support development demand.	None.
BNG12	Savills	Para 2.6	The SPD should more clearly state that it is only seeking for developments to achieve 'net gains' in accordance with the Local Plan, NPPF and PPG, not the 10% gain as stated in the Environment Act.	The SPD references the Environment Act within the footnotes, any clarification upon reading may be found within the Act document. The SPD does not specify this requirement as one that is currently enforced, instead stating 'The delivery of biodiversity net gain requires that any development delivers more and better-quality biodiversity than would exist without development taking place.' Therefore, should a developer wish to achieve the 10% gain which will soon be compulsory under the Environment Act then they are welcome to, the only requirement is that 'any development delivers more and better-quality biodiversity than would exist without development taking place.'	None.
BNG13	Savills	Para 4.3	The SPD references several proposals within the Environment Act which have not yet been confirmed by	Regarding the first point, in Paragraph 4.3 the SPD states 'All planning applications will be	None.

Coventry Biodiversity Net Gain SPD Consultation Summary

			<p>DEFRA, including the requirement that planning applications should be supported by Biodiversity Gain and for the biodiversity value of a site to be measured by activity before 30th January 2020 if it has been lowered since that date, and the Council should clarify whether these are a requirement of BNG.</p>	<p>required to submit a biodiversity gain plan which provides information on the site and details how biodiversity will be enhanced.’ Regarding the latter, in paragraph 4.8 the SPD clarifies that ‘If the biodiversity value of a site has been lowered by any activity after 30th January 2020 (other than with planning permission) with the resulting loss of habitats in advance of a biodiversity metric calculation being undertaken the baseline for the metric is to be taken as the habitats present prior to site clearance. The biodiversity value of the habitats lost is to be estimated based upon a desk-based assessment and professional judgement. The precautionary principle is to be applied where the distinctiveness or condition of the habitats lost is uncertain.’</p>	
BNG14	Savills	Para 4.5	<p>The SPD states that ecological surveys ‘should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated’. It is not normal practice for ecological surveys for all sites to include land outside of the red-line boundary particularly where this is in third party ownership. We therefore consider that this paragraph should be reworded to ‘surveys should include the whole of the development boundary (red line)’.</p>	<p>Comment noted. However, the SPD specifies that adjacent land should only be surveyed where it may be impacted by said development. To clarify this Para 4.5 will be amended from ‘The survey should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated.’ To ‘The survey should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated. On a case-by-case basis, applicants may be requested to undertake surveys of adjacent habitats, such as Local Wildlife Sites, where direct impacts are anticipated.’ This is essential to prevent unrecorded and unaccounted for biodiversity loss.</p>	Amend 4.5 as outlined.

## Coventry Biodiversity Net Gain SPD Consultation Summary

BNG15	Savills	Para 4.20	The SPD states that there is a preference for net gain to be achieved on site and sets specific requirements for what off-site mitigation will be accepted. The DEFRA 'Consultation on Biodiversity Net Gain Regulations and Implementation' document (January 2022) did not propose such restrictive off-site requirements (pdf page 55 of the consultation document). The SPD should not be proposing any requirement over the provisions already set out in the adopted Local Plan and NPPF. Additionally, off-site land identified by a developer that is considered to be in proximity to the development site and / or is evidenced as being able to deliver the required BNG should be considered acceptable by the Council. The SPD should be amended to remove the specific off-site requirements listed.	Comment noted. Paragraph 4.20 states that off-site habitat provision should be 'directed' to a list of areas. This does not suggest a compulsory requirement, just a preference to maximise BNG. Off-site land identified by the developer, and 'alternative methods of providing adequate offset through third party schemes or the purchase of Biodiversity Credits will also be considered acceptable in principle' as stated in Paragraph 4.16.	None.
BNG16	Savills	Para 4.9	The SPD is proposing to start using the DEFRA metric as opposed to the Warwickshire metric, additional information is required to justify why the DEFRA model should be used.	Warwickshire County Council, who initiated the Warwickshire metric no longer use it, and the DEFRA metric has been promoted as a national tool.	None.
BNG17	National Highways	-	No comment	-	None.
BNG18	Resident	Para 1.2-1.4	The document should be retitled to 'Nature Recovery and Biodiversity Net Gain Supplementary Planning Document' as this would widen its remit and provide an opportunity to cover all the aspects which impact on the planning process e.g., protected species. This could also be emphasised in the 'Aims and Objectives' section potentially, statement with a commitment to a 'biodiversity first' approach to policies where sites of low biodiversity are earmarked first for development would be useful especially if it could refer to the avoidance of discrimination against urban wastelands. At the moment, the SPD focuses on one aspect, biodiversity net gain, and does not take account of requirements for protected species. Yet, there are	Comment noted. The scope of this SPD is specifically, to clarify the impact of the new BNG principle outlined in the Environment Act and its impacts on the planning process for developers and planning officers.	None.

Coventry Biodiversity Net Gain SPD Consultation Summary

			<p>crossovers in requirements for ecological surveys and information on protected species should be used to inform onsite biodiversity mitigation and compensation measures. A document which encompasses both would be less confusing for applicants and better serve the purpose of BNG which is to restore nature and halt the decline in species abundance.</p>		
BNG19	Resident	Para 3.1-3.12	<p>This title could be changed to 'relevant policy, legislation, guidance and best practice' to allow references to best practice examples and guidance within documents such as the Biodiversity Code of Practice for Planning and Development (BS 42020:2013). This Code of Practice should be acknowledged within this section in addition to a discussion of benchmarks such as the 'Building with Nature Standards Framework'. The use of best practice, standards and benchmarks could help streamline the planning process and ensure that all developments across the City are following the same principles, protecting against building-in new or adding to existing environmental inequalities. This section should signpost readers to further ecological resources and those relevant to development such as SuDS and the impacts of building materials. There should also be a section which highlights a requirement to use appropriately qualified and experienced ecologists.</p>	<p>Comment noted. The Council understands that there needs to be more guidance regarding best practises for nature conservation and future strategy, and this is within discussion. However, outlining the relationships between environmental protection, development and inequality is outside of the scope of this SPD. The Council will review our webpages to see if there is an opportunity to provide a more flexible list of resources.</p>	None.
BNG20	Resident	Para 4.4 – 4.11	<p>The SPD should outline the circumstances where a soil resource survey and plan are required and when soil should be covered within the site waste management plan as soils are an important aspect of sustainability but seem rarely to be considered especially in terms of biodiversity, so it is important to highlight the Government's code of practice for the sustainable use of soils on construction sites.</p>	<p>Comment noted. The SPD reflects the requirements of the Environment Act in reference to BNG, of which soil management is not mentioned.</p>	None.

## Coventry Biodiversity Net Gain SPD Consultation Summary

BNG21	Resident	Para 4.3 Table 1	The wording 'no information required' could cause confusion as ecological surveys may be required under certain circumstances e.g., if a householder's application were to disturb a Badger sett, a bat roost, House Martin nests, etc. without ecological surveys, the appropriate level of mitigation is unlikely to have been considered effectively for protected species either at the planning application stage for individual sites or earlier on when creating policies for strategic allocations or neighbourhood plans.	This section refers specifically to biodiversity offsetting and does not preclude the requirement for specific ecological consideration, which is enforced in other key pieces of legislation. This is specified in the SPD in Para 4.3 where it says 'All planning applications will be required to submit a biodiversity gain plan which provides information on the site and details how biodiversity will be enhanced. The required amount of information submitted with the application will vary according to the application, see Table 1'. However, this can be clarified by changing 'Table 1: Information required by applications' to 'Table 1: Biodiversity enhancement information required by applications'	Amend Table 1 label as outlined.
BNG22	Resident	Para 4.4 – 4.8	Within section 4, there should be an additional paragraph referring to Natural England's standing advice for protected species.	Within the SPD below Table 1, it is stated that 'Ecology information regarding net gain is independent of any information regarding legally protected species. All developments which may adversely impact on protected species (e.g., bats, badgers, great crested newts) are required to submit appropriate information with the application.'	None.
BNG23	Resident	Para 4.4	Outlining expectations for ecological surveys as early as possible in the process is essential as some surveys must be done at specific times of the year or over a prolonged period. Highlighting requirements early on helps to streamline the process and avoid delays later. In terms of strategic allocations in local plans, it would be useful if ecological surveys for protected species were conducted at the earliest possible opportunity so that their results could inform policies for sites and nature recovery more widely.	As noted above within this document, the place in which BNG is required within the planning system will be clarified, and this will outline the requirements suggested.	None.

## Coventry Biodiversity Net Gain SPD Consultation Summary

BNG24	Resident	Para 4.4-4.8	There should also be a reference in this section to how long EclAs (including data searches) and ecological surveys will remain valid for and when they should be updated. This is essential for considering new biological records, legislation and guidance as well as changes within the conditions of a site itself. A section on the role of Warwickshire Biological Records Centre (WBRC) should also be included with details on how to obtain data searches through them. A requirement to submit the results of surveys to the WBRC within a specific timescale should also be outlined.	Due to the private nature of WRBC it is not universally accessible and therefore will not be referenced in the SPD.	None.
BNG25	Resident	Para 4.12	Due to the limitations of data searches, it is important to outline what should happen if evidence of protected species comes to light during the consultation process or later when clearance/construction is taking place on the site. For example, outlining the process for investigating evidence of protected species provided by residents.	The SPD states in Paragraph 4.12 'If an impact on an ecological asset is identified, applicants must propose how that impact will be avoided, mitigated, or compensated for in accordance with the mitigation hierarchy'. This SPD does not have the scope to outline the separate national frameworks for each relevant protected species.	None.
BNG26	Resident	Para 4.4	In addition to the BIA, there should be separate sections outlining when an EclA, CEMP and BEMP are required. CIEEM provide guidelines for EclAs which are regularly updated and so could be sign-posted within the SPD. The aims of the CEMP and BEMP/LEMP are to protect, enhance and increase the biodiversity value of a site post development and to provide evidence to support the BIA and associated calculations. They can be provided as part of the EclA or secured through planning conditions or obligations. However, it makes sense for these documents to be provided at the earliest possible opportunity within the planning application process.	Comment noted. However, the SPD does not have the scope to outline all methods and requirements of ecological surveying. The appropriate surveys will be requested on a case-by-case basis as needed.	None.
BNG27	Resident	Para 4.3, 4.11	Features such as hedgehog-friendly fencing and hibernacula, for insects and herptiles, should be added to the list in the last sentence. Expectations for commercial buildings in terms of providing	Comment noted. Table 1 Householder required information will be amended from 'Any mitigation is likely to be provided onsite through enhancements such as bat boxes, swift	Amend Table 1 and Para 4.11 as outlined.

## Coventry Biodiversity Net Gain SPD Consultation Summary

			nesting/roosting sites for birds and bats should also be outlined. Where the nature of construction or use of materials and lighting makes inclusion of these features within a building problematic, employment sites should be required to have wildlife towers. The wording of this section should be amended to make it clearer to applicants that protected species, which roost or nest in buildings, are considered and biodiversity enhancements for net gain would be in addition to any avoidance, mitigation and compensation measures.	bricks and wildlife-friendly planting' to 'Any mitigation is likely to be provided onsite through enhancements such as bird/bat boxes, hedgehog-friendly fences, hibernacula, swift bricks and wildlife-friendly planting'. Paragraph 4.11 will be amended from 'Features such as green walls, green roofs, containers and bird/bat boxes will provide appropriate benefits' to 'Features such as green walls, green roofs, hedgehog-friendly fencing, hibernacula, containers and bird/bat boxes will provide appropriate benefits'.	
BNG28	Resident	Para 4.11	This section should include information on brownfield sites as there are often misconceptions about them which can lead to negative impacts on biodiversity particularly in areas of deprivation.	Comment noted. As noted in the NPPF, we recognise that brownfield sites have biodiversity value and Para 4.11 will be amended to reflect this.	Amend 4.11 as outlined.
BNG29	Resident	Para 4.17	Is the phrase '...within the boundary of the City' both too wide and too narrow? Policy GE3 states that, '...compensatory provisions should be made as close to the original site as possible.' This principle should be incorporated within the SPD itself. If the purpose of BNG is for nature recovery, surely its use should always result in a net gain within a neighbourhood. However, uncontrolled, there is a real danger that biodiversity offsetting could become biodiversity asset stripping.	In Paragraph 2.4 the SPD states 'The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.' This should ensure that where possible neighbourhood biodiversity levels are not degraded over time. However, to clarify this, Para 4.20 will be changed from 'Where off-site habitat provision is necessary, this should be directed to the following areas:' to 'Where off-site habitat provision is necessary, this should be directed to the following areas as close to the original site as possible:'	Adjust 4.20 as outlined.
BNG30	Resident	Para 4.17	To fulfil the principles of section 1.4, within the Local Plan Policy GE3, an additional area should be added to the list to ensure that neighbourhoods which have the least green space and poorest levels of biodiversity within the City are prioritised over others e.g., <i>areas which have a quantity of green space per 1,000 population lower than the City's average (3.05 hectares</i>	Due to the nature of the SPD, it cannot introduce new policy such as this.	None.

Coventry Biodiversity Net Gain SPD Consultation Summary

			<p><i>per 1,000 population) will be prioritised.</i> This would help protect deprived areas from environmental inequalities being exacerbated by biodiversity offsetting. Maximising benefits for biodiversity will always need to be weighed against social, health and wellbeing outcomes for communities. It might be useful to also have a separate statement about this within Appendix 3 along with referencing the Sub-Regional Green Infrastructure Strategy 'Warwickshire, Coventry and Solihull Green Infrastructure Map' when wildlife corridors are mentioned.</p>		
BNG 31	Resident	Appendix 2: Survey Season	<p>To ensure consistency in approach, the diagram in Appendix 2 should follow the survey timetable (Table 2) as outlined in Natural England's standing advice for protected species. There are sections missing such as 'birds (migration)' and 'bats (foraging or commuting)'. As part of Appendix 2, there should be a reference to dependency on weather conditions when conducting surveys, otherwise, it could undermine the validity of the applicant's EclA, etc.</p>	<p>Comment noted. Appendix 2 will be amended to show the updated information provided by Natural England.</p>	<p>Amend Appendix 2 to include everything covered in Table 2 on the following link <a href="https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#when-to-survey">https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#when-to-survey</a></p>
BNG 32	Resident	-	<p>Opportunities for BNG may be hiding within the landscape and the use of historical maps could help reveal them. This is a relatively new concept but should be included within the SPD particularly to support the identification of appropriate onsite mitigation, compensation measures and potential offset habitat creation sites. In a similar way, historic maps should be used to identify ghost ponds and, if possible, they should</p>	<p>Comment noted. However, as discussed above the scope of this SPD is just to clarify the impact of the new BNG principle outlined in the Environment Act and its impacts on the planning process for developers and planning officers.</p>	<p>None.</p>

## Coventry Biodiversity Net Gain SPD Consultation Summary

			be restored using the sediment from their original location. Historic maps should also be reviewed for locations where there was once woodland, orchards, woodland pasture, deer parks or pleasure gardens as it is possible that they may be suitable for tree planting schemes. The National Library of Scotland has a side-by-side georeferenced maps feature which allows you to look at a modern map/satellite image and historical maps at the same time.		
BNG 33	Resident	Para 2.1-2.3	Alongside woodland, the importance of soils, grassland, orchards and hedgerows in terms of carbon storage and sequestration also need to be highlighted within the SPD.	Comment noted. As discussed above in reference to the need for soil surveys, the importance of various ecosystem types to wider ecosystem functions than biodiversity is of the utmost importance to the Council, however, will need to be fully outlined by broader legislation as it is outside the scope of this SPD.	None.
BNG 34	Resident	Para 2.4, Para 4.20	Should the SPD outline the categories of land use which are excluded from biodiversity calculations due to their maintenance requirements? For example, should road verges and path edges, roundabouts, curtilage of commercial buildings and parking areas or space underneath electricity pylons, where there would be limitations on planting schemes and their management due to measures required for access, safety, security, visibility and/or operational requirements, be excluded? Some types of land use, such as B8, have requirements which would reduce opportunities for biodiversity net gain and this should be considered when assessing whether it is an appropriate land use for the site, whether a proposed floorspace within a masterplan is sustainable and making biodiversity calculations.	Comment noted. The SPD follows national policy and DEFRA's guidelines in reference to the land use categories suitable for biodiversity net gain. At the moment, this guidance is that anything larger than 1m2 should be required to provide gain, therefore this is the stance the SPD takes.	None.
BNG 35	Resident	Para 2.4 - 2.6	Other aspects which need to be accommodated such as air quality and climate change can also have an impact on BNG. Whether this is positive or negative depends upon how mitigations and compensatory measures are	Comment noted. As discussed above this is outside the scope of the SPD and broader interrelations between environmental issues	None.

**Coventry Biodiversity Net Gain SPD Consultation Summary**

			<p>selected and implemented. Guidelines for developers should be provided so that urban form has a positive impact on the heat island effect, air quality and biodiversity. As part of this, the selection of plant species needs careful consideration as some species can create issues due to the biogenic volatile organic compounds and pollen they emit. Lighting schemes, building design and use of materials are also factors which could affect biodiversity.</p>	<p>will be discussed in length in future policy documents.</p>	
--	--	--	---	--	--

**Strategic Environmental Assessment of the Biodiversity Net  
Gain Supplementary Planning Document**

---

**Coventry City Council**

**Strategic Environmental Assessment Screening Opinion for  
consultation**

**March 2022**

## **1. Introduction**

- 1.1 This screening report has been produced to consider whether the Biodiversity Net Gain Supplementary Planning Document (SPD) prepared by Coventry City Council should be subject to a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, as amended by The Environmental Assessments and Miscellaneous Planning (Amendment)(EU Exit) Regulations.
- 1.2 Paragraph: 008 of the Planning Guidance<sup>1</sup> states that supplementary planning documents may in exceptional circumstances require SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. This screening statement considers whether there are any impacts which have not already been assessed within the Coventry Local Plan which was adopted on 6th December 2017<sup>2</sup>, and determines whether or not SEA is needed for this SPD.

## **2. The Biodiversity Net Gain SPD: Context**

- 2.1 The Draft Biodiversity Net Gain SPD sets out further detail on existing policies contained within the adopted Coventry City Council Local Plan, in particular Policy GE1 (Green Infrastructure), Policy GE3 (Biodiversity, Geological, Landscape and Archaeological Conservation) and Policy DS4 (Part A: General Masterplan principles) The Local Plan is the City Council's statutory planning framework which sets out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created, enhanced and protected.
- 2.2 Requiring developers to provide open space as part of their proposals is a key requirement of Policies GE1, GE3 and DS4 of the adopted Coventry Local Plan as set out above.
- 2.3 The SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach.

## **3. The Screening Process**

- 3.1 The screening assessment is undertaken in two parts: the first will assess whether the SPD requires screening for SEA and the second part of the assessment will consider

---

<sup>1</sup> Reference ID: 11-008-20140306

<sup>2</sup> <https://www.coventry.gov.uk/localplan>

whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

**Table 1: Is SEA screening required?**

Environmental Regulations Paragraph detail	Comments
<p>2.(1) In these Regulations- [...] "plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which— (a) are subject to preparation and adoption by an authority at national, regional or local level; (b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case, (c) are required by legislative, regulatory or administrative provisions</p>	<p>Yes, this applies.</p> <p>The SPD is subject to preparation and adoption at local level. Whilst the SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act it will, if adopted, supplement the development plan and be a material consideration in the assessment of planning applications.</p>
<p><u>Environmental assessment for plans and programmes; first formal preparatory act on or after 21st July 2004</u> 5.(2) The description is a plan or programme which— (a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and (b) sets the framework for future development consent of projects listed in Annex I or II Directive 2011/92/EU(4) of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment.</p>	<p>Yes, this applies.</p> <p>The SPD is prepared for town and country planning purposes. It supplements the planning policy framework of the Coventry City Local Plan, by providing detailed guidance as to how these policies are interpreted for future consent of projects listed in Schedule II of Directive 2011/92/EU(4).</p>
<p>3) The description is a plan or programme which, in view of the likely</p>	<p>No this does not apply.</p>

<p>effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</p>	<p>The SPD is not likely to affect sites and has been determined not to require an assessment pursuant to any law that implemented Article 6 or 7 of the Habitats Directive.</p> <p>Habitat Regulations Assessment is not required. The Habitat Regulation Assessment undertaken in 2016 for the Coventry City Local Plan concluded that the plan would not cause a negative effect alone or in combination with other plans. The SPD does not provide any guidance which alters the impact of the policy on designated sites.</p>
<p>6) An environmental assessment need not be carried out—</p> <p>(a)for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level, or</p> <p>(b)for a minor modification to a plan or programme of the description set out in either of those paragraphs,</p>	<p>Yes, this applies.</p> <p>The SPD provides further detail on the implementation of biodiversity net gain within the adopted Local Plan. This applies to the whole administrative area of Coventry City Council.</p>
<p><u>Determinations of the responsible authority<sup>3</sup></u></p> <p>9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in—</p> <p>(a)paragraph (4)(a) and (b) of regulation 5;</p> <p>(b)paragraph (6)(a) of that regulation; or</p> <p>(c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects.</p> <p>(2) Before making a determination under paragraph (1) the responsible authority shall—</p> <p>(a)take into account the criteria specified in Schedule 1 to these Regulations; and</p> <p>(b)consult the consultation bodies.</p>	<p>This screening opinion has been prepared using the criteria specified in Schedule 1 as presented in Table 2.</p> <p>The statutory bodies (Natural England, Historic England and the Environment Agency) are to be consulted as required.</p>

<sup>3</sup> “Responsible authority”, in relation to a plan or programme, means the authority by which or on whose behalf it is prepared (Regulation 2(1)(a))

**Table 2: will the SPD have a significant effect on the environment<sup>4</sup>**

SEA requirement	Comments
1: The characteristics of plans and programmes, having regard, in particular, to	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The SPD has a minor role in setting the framework for projects. While the SPD forms a material consideration in decisions on planning applications, it has no influence on the location or volume of projects nor does it in itself allocate resources.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD does not create new policies but will support the policies in the adopted Local Plan. Other plans and programmes may outlive the SPD and during their preparation will be steered by national legislation and policy.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The purpose of the SPD is to provide guidance to support the biodiversity policies of the adopted Local Plan. The Local Plan SA/SEA assessed this. The purpose of the SPD is to ensure these beneficial impacts of that policy are delivered and maintained which contributes to promoting sustainable development.
(d) environmental problems relevant to the plan or programme; and	There are no environmental problems relevant to this SPD: it elaborates adopted Local Plan policy.
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD has no relevance to the implementation of retained EU law.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—	

<sup>4</sup> As set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

(a) the probability, duration, frequency and reversibility of the effects;	The SPD is not allocating sites for development. The SPD is to provide guidance for the application and implementation of the policies in the adopted Local Plan and is not expected to give rise to any significant environmental effects.
(b) the cumulative nature of the effects;	The SPD is not considered to have any significant cumulative effects. As the document provides further guidance to adopted local plan policies, but does not set policies itself, it cannot contribute to cumulative impacts in combination with the Local Plan.
(c) the transboundary nature of the effects;	There are no transboundary effects as this SPD relates to the Coventry City Council area only. Any potential significant transboundary environmental effects have already been assessed as part of the local plan's sustainability appraisal, the Habitat Regulations Assessment and the plan's examination process.
d) the risks to human health or the environment (for example, due to accidents);	The SPD poses no risk to human health.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The SPD relates to Coventry City Council's administrative area only.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these matters are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.

#### **4. Conclusion and Screening Recommendation**

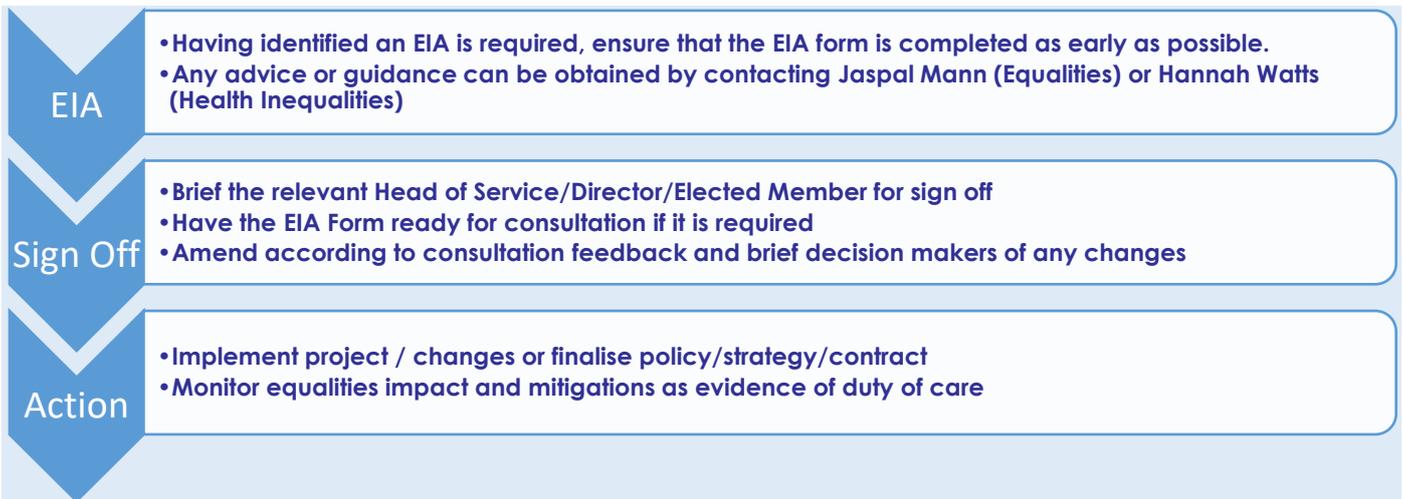
- 4.1 This screening opinion identifies that the SPD will provide guidance to support the biodiversity policies of the Coventry City Council adopted Local Plan. It is concluded that the SPD is unlikely to have significant environmental effects and therefore that Strategic Environmental Assessment is not required.

This page is intentionally left blank

## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Title of EIA</b>		<b>EIA Open Space SPD</b>
<b>EIA Author</b>	Name	<b>Clare Eggington</b>
	Position	<b>Principal Town Planner (Planning Policy)</b>
	Date of completion	<b>09/02/2022</b>
<b>Head of Service</b>	Name	<b>David Butler</b>
	Position	<b>Head of Planning Policy and Environment</b>
<b>Cabinet Member</b>	Name	<b>Councillor David Welsh</b>
	Portfolio	<b>Housing and Communities</b>



**PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM**

### SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

New policy / strategy

New service

Review of policy / strategy

Review of service

Commissioning

Other project *(please give details)* **Supplementary Planning Document for Open Space**



### 1.2 In summary, what is the background to this EIA?

The Biodiversity Net Gain Supplementary Planning Document (SPD) adds further details to the Local Plan which was adopted on 6<sup>th</sup> December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

The purpose of the Biodiversity Net Gain SPD is to set out the Council's approach towards achieving Biodiversity Net Gain (BNG) from any new development. BNG is achieved when a development leads to an overall increase biodiversity relative to the site beforehand. The Biodiversity Net Gain SPD sets out how this can be achieved in Coventry using established methods. It supplements Policy GE1 (Green Infrastructure), Policy GE3 (Biodiversity, Geological, Landscape and Archaeological Conservation) and Policy DS4 (Part A: General Masterplan principles) of the adopted Coventry Local Plan.

The additional guidance provided within the SPD aims to provide guidance for developers on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach.

### 1.3 Who are the main stakeholders involved? Who will be affected?

Developers who are required to deliver biodiversity gain as part of their proposals, those who deliver and maintain the resultant projects, and those members of the community who will benefit from more biodiversity in their local area.

### 1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Policy Service

## SECTION 2 – Consideration of Impact

*Refer to guidance note for more detailed advice on completing this section.*

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not

## EQUALITY IMPACT ASSESSMENT (EIA)



- Foster good relations between persons who share a relevant protected characteristic and those who do not

### 2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan was formulated using detailed evidence including a range of ecological studies and mapping. The Local Plan was independently examined by a Planning Inspector to ensure that its policies were robust and formulated using appropriate evidence before it could be found sound and capable of adoption. Further detail on the Local Plan and the evidence base can be found here <https://www.coventry.gov.uk/localplan>

This SPD details how the policy will be delivered, providing clear information for developers about policy requirements: how developers should calculate how much biodiversity they need to deliver, and the appropriate mechanism for doing this.

### 2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

*\*Any impact on the Council workforce should be included under question 2.6 – **not below***

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Almost a fifth of Coventry City Council’s residents are aged 0-15. Access to open space and nature is a fundamental need for development, health and wellbeing. 22.5% of children live in low income families which is above the regional and national average (20.2% and 17% respectively) <sup>1</sup> . Ensuring that developments provide appropriate levels of biodiversity as part of a wider network of open spaces is essential.

<sup>1</sup> <https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-201415-to-201819>

## EQUALITY IMPACT ASSESSMENT (EIA)



Age 19-64	<b>P</b>	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 67% of Coventry City Council's residents are aged between 16 and 64. Being of working age, these are the largest group likely to be accessing homes on new developments and will directly benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Age 65+	<b>P</b>	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 13.5% of Coventry City Council's residents are aged 65 and over and will benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Disability	<b>P</b>	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 17.7% of Coventry City Council's residents have a limiting long term health problem or disability and will benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Gender reassignment	<b>P</b>	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Marriage and Civil Partnership	<b>P</b>	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Pregnancy and maternity	<b>P</b>	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity..
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>P</b>	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Religion and belief	<b>P</b>	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Sex	<b>P</b>	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Sexual orientation	<b>P</b>	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.



HEALTH INEQUALITIES

**2.3** Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.

Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity

A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities

**Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.**

**If you need assistance in completing this section please contact: Hannah Watts ([hannah.watts@coventry.gov.uk](mailto:hannah.watts@coventry.gov.uk)) in Public Health for more information. More details and worked examples can be found at [https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-\(EIA\).aspx](https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx)**

Question	Issues to consider
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> <li>● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>)</li> <li>● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation</li> </ul>

Response:

The Biodiversity Net Gain SPD supplements the policies of the adopted Local Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See <https://www.coventry.gov.uk/localplan> This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to open space. See [https://www.coventry.gov.uk/downloads/file/28900/health\\_impact\\_assessment\\_spd](https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd)



<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p><b>Consider and answer below:</b></p> <ul style="list-style-type: none"> <li>• Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income</li> <li>• Consider what the unintended consequences of your work might be</li> </ul>																								
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Health Impact Assessment SPD referred to above includes the following:</p> <p><b>Category 3: Access to open space and nature</b></p> <p>Providing secure, convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is growing evidence that access to parks and open spaces and nature can help to maintain or improve mental health.</p> <p>The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children are missing out on regular exercise, and an increasing number of children are being diagnosed as overweight and obese. Access to play spaces, community or sport facilities such as sport pitches can encourage physical activity. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation.</p> <table border="1" data-bbox="363 1440 1481 1760"> <thead> <tr> <th>Considerations</th> <th>Negative effects</th> <th>Positive Effects</th> <th>Relevant Local Plan Policies and Supplementary Planning Documents</th> </tr> </thead> <tbody> <tr> <td rowspan="3"> <ul style="list-style-type: none"> <li>• Opportunities for physical activity</li> <li>• Access to open and natural space, including water fronts</li> <li>• Formal and informal outdoor play spaces</li> <li>• Maintenance of open space and sports facilities</li> <li>• Integration with other outdoor uses such as growing food</li> </ul> </td> <td>Failing to protect local green spaces and playing fields near to communities can limit opportunities for physical activity.</td> <td>The provision of publicly accessible blue space, green spaces and play spaces can encourage physical activity and maintain or improve mental health</td> <td rowspan="3"> <ul style="list-style-type: none"> <li>• DE1: Ensuring High Quality Design</li> <li>• DS3: Sustainable Development Policy</li> <li>• EM4: Flood Risk Management</li> <li>• EM5: Sustainable Drainage Systems (SuDS)</li> <li>• H3: Provision of New Housing</li> <li>• GE1: Green Infrastructure</li> <li>• GE2: Green Space</li> <li>• IM1: Developer Contributions for Infrastructure</li> </ul> </td> </tr> <tr> <td>Green spaces that are of poor quality, feel unsafe, or are inaccessible will discourage physical activity and social interaction</td> <td>A growing population, particularly an increase in children will require a range of formal and informal play spaces and equipment</td> </tr> <tr> <td>Failing to provide a range of different types of open and play spaces may place pressure on</td> <td>Natural spaces and tree cover provide areas of shade and can improve air quality in urban areas</td> </tr> </tbody> </table> <table border="1" data-bbox="341 1798 1481 2033"> <tbody> <tr> <td rowspan="3"> <ul style="list-style-type: none"> <li>• Maximising green infrastructure in urban environments (including green roof systems and gardens and green walls)</li> </ul> </td> <td>existing spaces where formal and informal activities may conflict with each other</td> <td></td> <td rowspan="3"> <ul style="list-style-type: none"> <li>• R2: Coventry City Centre – Development Strategy</li> <li>• Community Infrastructure Levy</li> </ul> </td> </tr> <tr> <td></td> <td>There may be opportunities to integrate play spaces with other related health and environmental programmes such as food growing and increasing biodiversity</td> </tr> <tr> <td></td> <td>Green walls can also provide insulation or shading and cooling</td> </tr> <tr> <td></td> <td></td> <td>Green infrastructure can reduce flood risk</td> <td></td> </tr> </tbody> </table>	Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents	<ul style="list-style-type: none"> <li>• Opportunities for physical activity</li> <li>• Access to open and natural space, including water fronts</li> <li>• Formal and informal outdoor play spaces</li> <li>• Maintenance of open space and sports facilities</li> <li>• Integration with other outdoor uses such as growing food</li> </ul>	Failing to protect local green spaces and playing fields near to communities can limit opportunities for physical activity.	The provision of publicly accessible blue space, green spaces and play spaces can encourage physical activity and maintain or improve mental health	<ul style="list-style-type: none"> <li>• DE1: Ensuring High Quality Design</li> <li>• DS3: Sustainable Development Policy</li> <li>• EM4: Flood Risk Management</li> <li>• EM5: Sustainable Drainage Systems (SuDS)</li> <li>• H3: Provision of New Housing</li> <li>• GE1: Green Infrastructure</li> <li>• GE2: Green Space</li> <li>• IM1: Developer Contributions for Infrastructure</li> </ul>	Green spaces that are of poor quality, feel unsafe, or are inaccessible will discourage physical activity and social interaction	A growing population, particularly an increase in children will require a range of formal and informal play spaces and equipment	Failing to provide a range of different types of open and play spaces may place pressure on	Natural spaces and tree cover provide areas of shade and can improve air quality in urban areas	<ul style="list-style-type: none"> <li>• Maximising green infrastructure in urban environments (including green roof systems and gardens and green walls)</li> </ul>	existing spaces where formal and informal activities may conflict with each other		<ul style="list-style-type: none"> <li>• R2: Coventry City Centre – Development Strategy</li> <li>• Community Infrastructure Levy</li> </ul>		There may be opportunities to integrate play spaces with other related health and environmental programmes such as food growing and increasing biodiversity		Green walls can also provide insulation or shading and cooling			Green infrastructure can reduce flood risk	
Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents																						
<ul style="list-style-type: none"> <li>• Opportunities for physical activity</li> <li>• Access to open and natural space, including water fronts</li> <li>• Formal and informal outdoor play spaces</li> <li>• Maintenance of open space and sports facilities</li> <li>• Integration with other outdoor uses such as growing food</li> </ul>	Failing to protect local green spaces and playing fields near to communities can limit opportunities for physical activity.	The provision of publicly accessible blue space, green spaces and play spaces can encourage physical activity and maintain or improve mental health	<ul style="list-style-type: none"> <li>• DE1: Ensuring High Quality Design</li> <li>• DS3: Sustainable Development Policy</li> <li>• EM4: Flood Risk Management</li> <li>• EM5: Sustainable Drainage Systems (SuDS)</li> <li>• H3: Provision of New Housing</li> <li>• GE1: Green Infrastructure</li> <li>• GE2: Green Space</li> <li>• IM1: Developer Contributions for Infrastructure</li> </ul>																						
	Green spaces that are of poor quality, feel unsafe, or are inaccessible will discourage physical activity and social interaction	A growing population, particularly an increase in children will require a range of formal and informal play spaces and equipment																							
	Failing to provide a range of different types of open and play spaces may place pressure on	Natural spaces and tree cover provide areas of shade and can improve air quality in urban areas																							
<ul style="list-style-type: none"> <li>• Maximising green infrastructure in urban environments (including green roof systems and gardens and green walls)</li> </ul>	existing spaces where formal and informal activities may conflict with each other		<ul style="list-style-type: none"> <li>• R2: Coventry City Centre – Development Strategy</li> <li>• Community Infrastructure Levy</li> </ul>																						
		There may be opportunities to integrate play spaces with other related health and environmental programmes such as food growing and increasing biodiversity																							
		Green walls can also provide insulation or shading and cooling																							
		Green infrastructure can reduce flood risk																							

## EQUALITY IMPACT ASSESSMENT (EIA)



- b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

Ensuring access to a range of suitable open spaces which incorporate biodiversity in relation to new developments will meet a range of needs and circumstances: this is a key aim of the Local Plan housing and green infrastructure policies and the SPD provides the further detail to ensure that those policies can be delivered.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

This was considered through the Local Plan (the 'parent document'), this document provides the detail to ensure the Local Plan policies can be delivered effectively

2.5 How will you monitor and evaluate the effect of this work?

The Local Plan includes monitoring indicators which includes monitoring the Green Environment for example 'designing new development to accommodate wildlife'.

2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: [lucille.buckley@coventry.gov.uk](mailto:lucille.buckley@coventry.gov.uk)

### Headcount:

#### Sex:

#### Age:

Female	
Male	

## EQUALITY IMPACT ASSESSMENT (EIA)



16-24	
25-34	
35-44	
45-54	
55-64	
65+	

**Disability:**

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

**Ethnicity:**

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

**Religion:**

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

**Sexual Orientation:**

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

**As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:**

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

<b>Signed: Head of Service:</b>	<b>Date:</b>
---------------------------------	--------------

## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Name of Director:</b>	<b>Date sent to Director:</b>
<b>Name of Lead Elected Member:</b>	<b>Date sent to Councillor:</b>

Email completed EIA to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk)

This page is intentionally left blank



---

Cabinet Member for Housing and Communities

13 December 2022

**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:**

New Residential Buildings Design Guide Supplementary Planning Document (SPD) - Adoption

---

**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

---

**Executive Summary:**

This report seeks to adopt the New Residential Buildings Design Guide Supplementary Planning Document (SPD) following public consultation which was undertaken between 06 July and 17 August 2022.

SPDs add further detail to the policies in the development plan but cannot introduce new policy. SPDs provide additional guidance for development and are capable of being a material consideration when making decisions on planning applications.

This SPD provides design guidance for applicants and developers proposing the creation of new residential dwellings within the city. Responses to the consultation have been analysed and taken account of when amending the SPD. The proposed final version is attached at Appendix 1, and a summary of representations along with responses and proposed amendments can be seen at Appendix 2.

**Recommendations:**

1. That Cabinet adopts the New Residential Buildings Design Guide Supplementary Planning Document (SPD).

2. That Cabinet delegates authority to the Strategic Lead (Planning) following consultation with the Cabinet Member for Housing and Communities to make any necessary further non-substantive (minor) changes to the document.

**List of Appendices included:**

Appendix 1: New Residential Buildings Design Guide Framework Supplementary Planning Document.

Appendix 2: Consultation: summary of representations and responses

Appendix 3: Strategic Environmental Assessment Screening Report

Appendix 4: Equalities Impact Assessment

**Background papers:**

Cabinet Member Meeting, 29 June 2022, Agenda Item 4

**Other useful documents:**

Local Plan: adopted December 2017

National Planning Policy Framework July 2021

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

No. Although this report will not be considered by Scrutiny, a report was considered by the Communities and Neighbourhoods Scrutiny Board (4) on 7 July 2022 as part of the consultation process.

**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:** New Residential Buildings Design Guide Supplementary Planning Document (SPD) - Adoption

**1. Context (or background)**

- 1.1 The National Planning Policy Framework (NPPF) defines Supplementary Planning Documents (SPDs) as 'documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues.... Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan'.
- 1.2 It is good practice to update SPDs over time to ensure that they remain relevant and robust. This SPD is a comprehensive review and updating of the previous Residential Design Guide from 1991, and will provide clear guidance for developers and applicants considering creating new dwellings within the city.
- 1.3 In particular the SPD approaches the design considerations that applicants must undertake when bringing forward applications that create new dwellings. Good design can have a significantly beneficial impact on residents, both of the new dwellings and those nearby. Conversely, ill-thought-out design can have a detrimental effect and so it is important that these matters are addressed at the start of the planning process.
- 1.4 By setting out the key objectives and criteria, as well as providing examples of best practice across a range of design issues, the SPD will help drive up design quality standards. Embedding this positive design process into the early development of site design is critical to positive outcomes.
- 1.5 Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. This includes a minimum statutory public consultation period of four weeks: the Council's recently adopted Statement of Community Involvement however sets out a local standard that SPDs should be consulted on for six weeks. Consultation for this report took place between 06 July 2022 to 17 August 2022.
- 1.6 It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. The screening opinion undertaken is attached at Appendix 3. This concludes that no SEA is needed as the SPD elaborates on existing policy. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. The screening report was made publicly available for comment at the same time as the SPD was being consulted on.
- 1.7 Finally, an Equalities Impact Assessment (EIA) been undertaken, this is attached at Appendix 4 and was publicly consulted on.
- 1.8 Responses have been analysed and the SPD amended accordingly. In line with the legislation, this report includes a statement setting out the details of the consultation, a summary of the main issues raised and how they have been addressed. This is contained at section 3 and Appendix 2 of this report.

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

- 2.1 The Council could choose not to adopt the SPD. However, this will mean that applicants and officers are deprived of the additional detail of the SPD which will ensure that new residential buildings come forward in with high quality design considerations. This option is therefore not recommended.
- 2.2 The Council could choose to adopt the SPD, with the changes as set out in Appendix 1. This will ensure that applicants and officers are clear regarding the information requirements when applying for new residential buildings, as well as ensure high quality design is embedded in applications from an early stage. For these reasons this is the recommended option.

## **3 Results of consultation undertaken**

- 3.1 Public consultation was undertaken between 06 July and 17 August 2022. The minimum statutory period for SPD consultations is four weeks, the council's Statement of Community Involvement recommends six weeks.
- 3.2 The council made all consultation documentation available on its website and in hard copy at the Council House and all libraries. A notification email was sent to all consultees on the planning policy consultation database which provided background to the SPD consultation and explained where people could view the documents and the various ways in which they could provide comments. The council also used its social media platforms and local press to publicise the consultation.
- 3.3 Regulation 12 of the Local Planning Town and Country Planning (Local Planning) (England) Regulations 2012 states that, before a local planning authority can adopt an SPD it must first prepare a statement setting out the persons consulted during the preparation of the document, with a summary of the main issues raised and how they have been addressed in the SPD. This report addresses these requirements, and details of the comments submitted, the officer response and changes made to the SPD as a result can be viewed at Appendix 2.
- 3.4 Alongside the SPD, the SEA screening opinion and Equality Impact Assessment were made available for public comment as set out in section 1 of this report. In terms of the SEA screening, the statutory consultation bodies Natural England and Historic England concurred with the council's view that Strategic Environmental Assessment is not required. The Environment Agency did not respond. The screening assessment at Appendix 3 has been updated to reflect this conclusion. The Equality Impact Assessment at Appendix 4 has been updated as a result of internal guidance although no external responses were received on the matter.

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

- 4.1 The SPD will be adopted as soon as practicable.

## **5 Comments from the Chief Operating Officer (Section 151 Officer) and the Chief Legal Officer**

- 5.1 Financial implications

There are no financial implications associated with this report.

## 5.2 Legal implications

- 5.1 There are no direct implications as a result of this report. Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) also require the Council to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken.

## 6 Other implications

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

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 document focuses upon supporting local communities by creating an attractive, cleaner and greener city and enhancing the quality of the built environment.

### 6.2 How is risk being managed?

There are no risks associated with this report.

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

No direct impact.

### 6.4 Equalities Impact Assessment EIA

A full Equality and Impact Assessment (EIA) 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). The Supplementary Planning Document elaborates on Local Plan policy and so a further EIA has been undertaken (Appendix 4).

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

The design guidance provided within the SPD will help ensure that the positive environmental benefits that can be associated with new residential development are achieved.

### 6.6 Implications for partner organisations?

There are no significant impacts for partner organisations.

#### **Report author:**

#### **Name and job title:**

David Butler

Head of Planning Policy & Environment

**Service**

Streetscene and Regulatory Services

**Tel and email contact:**

Tel: 024 7697 2343

Email: [David.butler@coventry.gov.uk](mailto:David.butler@coventry.gov.uk)

Enquiries should be directed to the above person.

This report is published on the council's website:

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

<b>Contributor/ approver name</b>	<b>Title</b>	<b>Service</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Laura Knight	Governance Services Officer	Law and Governance	11/11/22	18/11/22
Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	11/11/22	16/11/22
<b>Names of approvers for submission: (officers and members)</b>				
Cath Crosby	Lead Accountant, Business Partnering,	Finance	11/11/22	16/11/22
Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	11/11/22	16/11/22
Andrew Walster	Director of Street Scene and Regulatory Services	-	11/11/22	16/11/22
Councillor D Welsh	Cabinet Member for Housing and Communities	-	16/11/22	22/11/22



**Style Definition:** Energy SPD: Font: 12 pt, Not Bold, Justified, Indent Left: 0 cm, First line: 0 cm, Line spacing: 1.5 lines



# Coventry City Council

## Design Guidance for New Residential Developments

Supplementary Planning Document (SPD)  
(Draft)



## Contents

1	Glossary .....	3
2	Executive Summary.....	5
3	Introduction .....	6
4	Policy Context.....	7
5	Design Process Expectations in Coventry.....	10
6	Layouts .....	14
7	Built Form.....	27
8	Amenity.....	43
9	Curtilage Development.....	57

DRAFT

## 1 Glossary

Active frontages	Elevations that add interest, life and vitality to the public realm through the use of frequent doors and windows, narrow frontage buildings, articulation of facades with projections and lively internal uses visible from the outside or spilling onto the street.
Building line	The line formed by elevations of buildings along a street. Building lines can exist along the front and rear of a line of buildings.
Bulk	The combined effect of the arrangement, volume and shape of a building or group of buildings. Also called massing.
DAS	Design and Access Statement.
Daylight	<del>Volume</del> <u>The level</u> of natural light which enters a dwelling to provide satisfactory illumination of internal accommodation between dawn and dusk.
Density	The number of buildings or floorspace in relation to a given area of land. In this Guide, density is more than just the number of residential units/ha.
Design principle	An expression of one of the basic ideas guiding the design of a development.
Dual aspect dwelling	A dual aspect dwelling is one with opening windows on two external walls, which may be on opposite sides of the building or around a corner.
Habitable rooms and areas	<del>Defined as any room where individuals will sit or lie down and require a reasonably quiet environment in which to concentrate or rest.</del> Inclusive of living and dining room/spaces, conservatories, bedrooms Where kitchens are used exclusively for preparation, these would not be considered habitable space, however, would retain a requirement for <del>an outlook and</del> a positive level of natural light.
Focal point	A building, structure, tree or other element that stands out from its background by virtue of height, size or some other aspect of design.
Grain	The pattern of the arrangement and size of buildings and their plots in a settlement and the size of street blocks and junctions.
Human scale	The use within development of elements that relate well in size to the biology of an individual human being and their assembly in a way that makes people feel comfortable rather than overwhelmed.
Layout	The way buildings, routes and open spaces are placed in relation to each other.
Publicly Accessible Land	Includes streets, cycle links, footpaths, open spaces, play areas, street furniture and public art.
Private realm	Those spaces that belong to or are controlled by the occupier of individual or groups of dwellings. These include front, side and rear garden areas, parking courts and separate pedestrian links where

	they have been designed to connect private space, such as the rear of terraces.
Scale	The impression of a building when seen in relation to its surroundings, or the size of parts of a building or its details, particularly as experienced in relation to the size of a person.
SuDS	Sustainable Drainage Systems (previously known as Sustainable Urban Drainage Systems) - drainage systems designed to reduce surface water flooding impacts from development through the use of natural systems e.g., by creating ponds and swales and using permeable materials for hard surfaces.
Vertical sky component	The Vertical Sky Component (VSC) is a measure of the amount of visible sky available from a point on a vertical plane. The reference point used for the calculation is usually the centre of the vertical face of the window.

DRAFT

## 2 Executive Summary

### What is a SPD?

2.1 A Supplementary Planning Document (SPD) is a document which contains additional detail on how the Council will interpret and apply specific policies in its Local Plan. An SPD cannot include any new policies that do not currently form part of the Local Plan and a SPD also does not form part of the Local Plan. However, it is a key consideration in the determination of planning applications and applicants are advised to refer to the contents of an SPD, as this will provide guidance on how the Council will carry out its decision-making functions.

### Aims and Objectives

2.2 This Design Guide SPD supports Local Plan design policies by setting out what the Council considers to be good residential design. Its purpose is to provide guidance to the development industry, the Council and the public on how to ensure that the city's future housing development has the required high quality and inclusive design to help deliver the great place, community and future desired for Coventry. The Guide sits alongside, and should be read in conjunction with, other design guidance documents the Council has published.

### Applying the SPD

2.3 The Guide relates to all new residential development in the city. This includes:  
- New housing units in the form allocated sites, windfalls and infill through to new neighbourhoods and sustainable urban extensions.

2.4 The Guide does not provide guidance on matters already addressed by national Building Regulation requirements (e.g., energy and water efficiency and disabled access). The city benefits from [Local Plan Design and Heritage Policies and](#) a number of specific and detailed conservation area character documents in the form of supplementary planning documents (SPD) and conservation area appraisals. This Design Guide sits alongside these documents and should be read in conjunction with them.

2.5 The Government and other bodies are expected to prepare or amend their policies, advice and guidance in a number of areas referred to or relevant to this SPD. Where this occurs, new or changed documents could also be material planning considerations which may need to be considered alongside this SPD.

### 3 Introduction

3.1 This guide sets out design considerations for all scales and types of new residential development. It works from strategic issues down to detailed matters and reflects the sequence by which successful places are designed. The SPD is structured to ensure the following key elements are covered by:

- summarising relevant Local Plan policy that is relevant along with key aspects of national policy;
- setting out the information that should be included when submitting a planning application;
- providing a checklist/questionnaire that all applicable developments can use; and
- providing guidance on good practice in residential design.

3.2 This SPD is intended principally for applicants for planning permission and their agents, and for planning decision makers. It has been produced to ensure that applicants provide the right information so that planning decision makers can assess whether development proposals comply with Local Plan policy DE1 – Ensuring high quality design.

3.3 This SPD is a material consideration in planning decisions and decision makers will use it to help determine planning applications. This SPD replaces the existing 1991 Residential Design Guide SPG.

#### How to use this guide

3.4 This guide sets out design considerations for all scales and types of new residential development. It works from strategic issues down to detailed matters and reflects the sequence by which successful places are designed. Particular attention should be paid to the specific guidelines set out in the blue principle boxes in chapters 5 – 940.

3.5 All developments will need to be designed in light of the Council's overarching design process principles set out in Chapter 5. ~~Table 1 should also be used to determine which of the specific guidelines in Chapters 5-10 are likely to be applicable to a particular development.~~

3.6 Imagery used within this document is contained in order to assist in the exploration of possible design outcomes, however inclusion of such imagery does not suggest endorsement. Proposed design outcomes will be assessed on a contextually specific basis.

Formatted: Font: Not Bold, Underline

Formatted: Font: Not Bold, Underline

Formatted: Font: Not Bold, Underline

## 4 Policy Context

### National Planning Policy Framework

4.1 The NPPF, revised in July 2021, sets out the Government's planning policies for England and how these should be applied. Its main purpose is to protect the environment, promote healthy communities and sustainable growth.

4.2 Among the key changes to the NPPF are updated policies aiming to improve the design of new developments, in response to the findings of the government's Building Better, Building Beautiful Commission. Key elements of this approach include:

- changes to the overarching social objective of the planning system (paragraph 8b) to include the fostering of "well-designed, beautiful and safe places".
- introducing a new test that development should be well-designed (paragraph 133). This says that "development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes".
- the test clarifies that "significant weight" should be given to "development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes". Significant weight should also be given to "outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area", paragraph 133.
- paragraph 128 states that in order to "provide maximum clarity about design expectations at an early stage", all local planning authorities "should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences".

### National Planning Practice Guidance

4.3 The national planning practice guidance document is relevant as detailed in the 2019 Design: process and tools<sup>1</sup>. This useful document should be read alongside this guidance,

---

<sup>1</sup> [www.gov.uk/guidance/design](http://www.gov.uk/guidance/design)

the National Design Guide<sup>2</sup> sets out the characteristics of well-designed places and demonstrates what good design means in practice.

### Local Policy Context

4.4 Local design policies can be found in the adopted Coventry Local Plan 2017. This Guide has been prepared to provide detailed guidance for residential development in relation to these design policies, particularly DE1 – Ensuring High Quality Design, see figure 1.

4.5 The Design Guide is intended to be read and used as a companion document to other Council design publications. At the current time this includes:

- Sustainable Urban Extensions Design Guidance SPD, 2019;
- Design Guidance on Shopfronts for Conservation Areas and Historic Buildings, 2014; and
- City Centre Area Action Plan, 2017.

4.6 This SPD replaces the following SPD/SPG:

- Residential design guide SPG, 1991

---

<sup>2</sup> [www.gov.uk/government/publications/national-design-guide](http://www.gov.uk/government/publications/national-design-guide)

Figure 1: Coventry Local Plan design policy

**Policy DE1 Ensuring High Quality Design**

1. All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. All development will be expected to meet the following key principles:
  - a) respond to the physical context of the site;
  - b) consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;
  - c) where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;
  - d) preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
  - e) preserve or enhance the character and setting of major road, rail and canal corridors;
  - f) clearly define the boundaries between public and private spaces and enclosure of space;
  - g) provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
  - h) make places that inter-connect and are easy to move through;
  - i) ensure places are easily understood by users, with clear routes and distinct physical features;
  - j) seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
  - k) be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
  - l) promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
  - m) be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
  - n) consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);
  - o) support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;
  - p) minimise adverse impact on important natural resources;
  - q) conserve, restore or enhance biodiversity; and
  - r) respect and enhance landscape quality including trees, hedges and other landscape features of value.

## 5 Design Process Expectations in Coventry

5.1 The Council will expect development proposals seeking planning permission to have evolved through an iterative design process. ~~Larger-s~~Schemes ~~of~~(50+ net new units) will be expected to demonstrate having followed all steps identified in Table 2.

Table 2: Design process

<b>STEP 1</b>	<b>Site analysis</b>	Site & its context
		Opportunities and constraints
		Understanding of policy environment
<b>STEP 2</b>	<b>Interpreting the brief</b>	Vision setting
		Concept plan
<b>STEP 3</b>	<b>Engagement</b>	Community and neighbour engagement
		Council Pre-application discussions
		Statutory consultee engagement
<b>STEP 4</b>	<b>Detailed design</b>	Concept refinement
		Master planning
		Plot <u>layout plans</u>
		Design and Access Statements
		Detailed design
<b>STEP 5</b>	<b>Submission</b>	Planning application

Note: ~~Steps 4 and 5 are not expected at Outline application stage~~Concept refinement, plot layout plans and detailed design elements will not be expected in outline planning applications.

5.2 ~~For larger schemes (50+ net new units) the~~The Council ~~requires strongly recommends~~ the design of ~~the proposal~~subjects of more than 10 units to have ~~been subject to review~~ at engaged with the pre-application ~~stage~~process. Further information on this process can be found on the Council's website<sup>3</sup>.

<sup>3</sup> [www.coventry.gov.uk/info/110/planning/3082/pre-application\\_advice\\_for\\_planning\\_highways\\_and\\_drainage](http://www.coventry.gov.uk/info/110/planning/3082/pre-application_advice_for_planning_highways_and_drainage)

## Vision setting

5.3 Successful developments are underpinned by a guiding design vision. Once established and adopted by all parties, the vision anchors and guides the design team and enables it to communicate clearly and simply what the development is seeking to be and achieve

5.4 Applicants should develop their design vision early in the development process and then clearly articulate it to the Council in order to achieve a mutually agreed approach to any given development site and proposal.

5.5 Where, innovative, contemporary design solutions are proposed it is nevertheless critical that proposals are resultant of an understanding of context, to ensure proposals make a positive contribution toward wider character. Creating outstanding or innovative designs which promote high levels of sustainability will be welcomed, and help continue the cities rich history of architectural innovation, so long as they fit in with the overall form and layout of their surroundings.

Where applicants seek to deliver innovative design outcomes, a design rationale will be required to be submitted alongside proposals in order to articulate the design development process, evidencing an appropriate grounding to local context which presents the scheme with the following points of assessment and rationale :

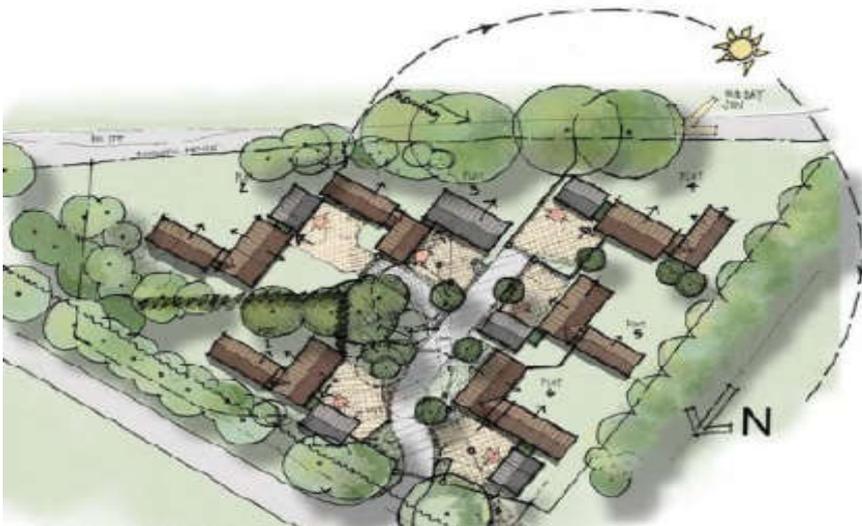
- Site constraints and opportunities analysis
- Key identifiers of character in local context, including;
  - Materiality
  - Architectural detailing
  - Scale, form & built environment hierarchy
  - Built form plan arrangement and urban grain
  - Landscape characteristics
  - Heritage assets and their setting
- Design vision & architectural narrative
- Design development stages, showing design evolution steps
- Evidencing responsiveness through re-interpretation, testing the proposals back to key character identifiers

- Summary of rationale and design outcomes, outlining how the proposals have sought to deliver their own innovative design solution whilst being responsive to local context and a positive contributor to local character.

### Concept Plan

5.6 For medium and larger schemes the vision should be supplemented by a high level concept plan. The aim of the concept plan is to show in a simple and clear way the key design principles that underpin the layout of the proposed development. It should include an indicative layout and illustrate key components such as access points, focal points, broad street and green space layouts and key site features to be retained. A concept plan is a higher-level document rather than a masterplan, see figure 2.

Figure 2: illustration of a concept plan



5.7 Together, the vision and concept plan can sum up what kind of place is being created. This allows the developer, Council and the local community to discuss how the basic structure of the proposals can be evolved and improved.

#### **Principle 1: Concept Plan**

- **All developments will be expected to set out the guiding vision for the development. Developments of 10 or more dwellings should also provide a concept plan in the Design & Access Statement.**

### Providing masterplans and plot layout plans

5.8 More detail of the design will be provided in masterplans. For medium and large sized development, developers will also be expected to provide plot-plans (~~sometimes referred to as conveyancing or platting plans~~) ~~showing~~ illustrating the extent of public and private ownership and all plot boundaries as part of their application.

#### **Principle 2: Concept PlanPlot Layout Plan**

- Developments of 10 or more dwellings will be required to provide plot-plans ~~to~~ layout plans which clearly identify plots, ownership boundaries and public/private spaces.

### Community Involvement

5.9 It is recommended that developers and designers seek the views and opinions of the local community to inform preparation of proposals. The extent of community involvement in larger developments will depend on the project's scale and complexity of issues. Applicants should refer to the Council Statement of Community of Involvement.

5.10 Details of the community engagement process and results should form part of the Design and Access Statement (DAS).

## 6 Layouts

6.1 The large structural elements of a residential development are vital in terms of setting whether it functions effectively. These structural elements include landscape, street and open space networks, use mixes, plot and building layouts. Carefully designed layouts create the framework upon which great places can be created and maintained. Poor layouts create poor places which are difficult to correct.

6.2 Designers and architects should pay particular regard to the following layout matters to ensure that great places can be created:

### Connectivity

6.3 Woven through the urban areas of Coventry is a network of public spaces made up of streets, parks, public open spaces and paths. This framework allows people to get to where they want to go and to spend time outdoors.

6.4 Some parts of Coventry have dense networks of connected spaces and routes for pedestrians, cyclists and vehicles that are easy to understand and navigate. Other areas could be better connected with streets and estates isolated by cul de sac layouts and lack of connections to surrounding areas (Figure 3). Developers may find local character guidance set out in other SPD's useful in identifying whether the development site lies in an area of good or poorly connected streets.

Figure 3: illustration of a poorly connected layout and well connected streets



6.5 New development will be expected to connect into and extend the surrounding route and space network in a high quality, safe and legible way. Although the Council does not wish to create vehicular rat runs through residential areas, cul de sac layouts will generally be resisted unless connectivity to surrounding areas can be introduced via open space or footpath/cycle links. New footpaths/cycleways should be high quality, acting as corridors for green infrastructure and generally lit by low level solar powered lighting. Designers should also look for opportunities to improving existing poorly connected places.

### **Principle 3: Connectivity**

#### **Residential developments should:**

- **Connect into and complement the existing local network of routes and public open spaces.**
- **Ensure that the internal network of routes and public open spaces are well connected, legible, direct and safe.**
- **Ensure connections for pedestrians, cyclists and public transport are given the highest priority.**
- **Look for opportunities to create connections into/through neighbouring land so that a well connected network can be created in the event of future land release and development.**
- **Should enable the connectivity of the natural environment in both public and private space.**
- **Deliver well lit and surveilled cycle and pedestrian routes**

### **Street Design and Enclosure**

6.6 Streets are the bedrock of places and make up the greater part of the public spaces within Coventry. They allow people access in, out, and through places, are spaces of social interaction and are vital in creating the character of an area. Street quality has a significant impact on how those living, working and visiting Coventry experience the city and it is important that they are legible, safe and attractive places to be in.

6.7 Many of Coventry's existing streets have a strong green character reflecting the heavily treed nature of the city and its links to the parkland. The council wishes to perpetuate and enhance this soft green character in its streets to reinforce the special characteristics and identity of the city. Designers will be encouraged to make use of green infrastructure

in the form of street trees, planted verges, green walls and gardens in new residential development to help maintain the ever expanding green character of the city, whilst contributing to cleaning and colling of the environment.

*Figure 4: Coventry street image illustrating soft landscaping character*



6.8 Residential streets should have building height to street width ratios that provide for a good sense of enclosure without overwhelming people who are using the streets. Street design should consider the context and fall within appropriate height to width ratios.<sup>4</sup>

*Figure 5: an example of buildings, boundary treatments and trees being used to enclose a street successfully*

<sup>4</sup> Street widths should be measured from the front of the building on one side of the street to the front of the building on the other side of the street. This will mean front gardens, pavements, cycle lanes, verges and road carriageways are included in the street width.



#### **Principle 4: Street Design**

Residential developments should:

- Be based on streets designed as places primarily for people. Particular attention will need to be given to streets needing to carry high levels of vehicle movement.
- Create a legible hierarchy of streets based on street character and form. Street layouts dominated by cul-de-sac type layouts will be resisted.
- Use street layouts that make walking and cycling more attractive and convenient for short trips than using the private motor car. Distances by foot and cycle should be shorter and more direct than by car.
- Create animated and active streets by using fine grain development and designing strongly active frontages on the network of streets and other routes. Blank or poorly active frontages (including buildings that turn their side or backs onto the street) will be resisted.
- Not contain overly engineered streets led by highway requirements.
- Use focal points, enclosure, setbacks, pressure vacuums, deflections and other townscape features to create visually interesting streets. Streets will be expected to be visually rich and aesthetically pleasing for people using them.
- Use appropriate trees, vegetation, gardens and open spaces to create a strong soft, green character to streets.
- Fully consider the integration of SUDS systems to positively contribute to drainage solutions, benefitting biodiversity and contributing to amenity.
- Design spaces within the street to facilitate social interaction. This could include pause points, small amenity spaces, seating and squares.
- Ensure streets are safe places by considering the needs of vulnerable users and providing active frontages, good lighting, clear, obstacle free routes for pedestrians and designing in traffic calming measures to restrict vehicle speeds.

## Shared spaces

6.9 Shared spaces are streets and areas of public realm in which all uses have equal status. They involve the introduction of features which influence driver behaviour to reduce vehicle speeds and create places that encourage a high level of social interaction between residents. They work best in short residential streets such as mews, cul de sacs and rural lanes.

6.10 Shared streets are increasingly being promoted in Coventry. Although the Council welcomes this approach, it is important the design is carefully considered to ensure that the needs of all road users (including vulnerable groups such as children, elderly and disabled) are catered for.

Figure 6: an example of a good, shared surface pedestrian friendly street



### **Principle 5: Street Design – Shared Space**

Principles governing the design of shared spaces in Coventry:

- Motorists should be treated as ‘guests’, who will be expecting to find other people walking, playing, and cycling in the street space.
  - Shared spaces should generally be restricted to short lengths of streets.
- Developments of over **20080** dwellings should contain a mixture of shared space

and

zones where the movement of vehicles takes a higher priority.

- Long stretches of surface with no refuge areas for vulnerable road users should be avoided.
- Materials and form should encourage safe play and social interaction between residents.
- Provision for car parking needs to be effectively integrated into the street in a safe and attractive manner.
- Street design should ensure inclusivity for all, notably careful consideration of gradients and demarcations to assist the visually impaired should be embedded into design proposals.

### Density

6.11 Coventry has a finite supply of land allocated for housing and given it is a relatively compact built up city with tightly defined boundaries, it is important that land resource is used efficiently to deliver the new residential development that the city needs. This may involve intensifying the urban fabric both in terms of numbers of houses or bedrooms(density) and in the amount of built mass.

6.12 Building at higher density, where appropriate and in accordance with the Coventry Local Plan density policy, can create a more intense environment which can be visually and socially exciting. It can also allow for additional populations to help maintain and support vital local facilities such as public transport systems, local shops and community centres. High quality, denser development at locations which are sustainably located will be encouraged, provided they are supported by adequate green infrastructure. This could include pocket parks, roof gardens, green walls, community gardens and communal amenity space. Such locations are likely to include windfall developments in the designated centres and the string of neighbourhood areas across many Wards of the city.

#### Principle 6: Density

- Housing development should seek to achieve the highest density possible without adversely impacting on the amenity of neighbours and residents or compromising local character, the environment or the appearance of an area.

- Residential developments in higher intensity locations will be expected to be supported by ~~generous~~ green infrastructure provisions which will provide the appropriate level of amenity space referencing CCC Open Space SPD.

### Uses and mix

6.13 Mixed and balanced communities are seen as being important in delivering the sustainable, high quality great places for Coventry's residents. Mixes of densities and dwelling types, sizes and tenures are seen as being vital in the creation of attractive neighbourhoods and the city will actively pursue this in all applications. Where appropriate, mixed use developments also play a significant role in providing homes, jobs and opportunities for community, leisure and retailing needs.

6.14 Details of the Council's housing mix need in terms of housing size, tenure and specialist accommodation types are outlined in the latest SHMA<sup>5</sup>. Designers are encouraged to discuss with the city planning team at an early stage the specific nature of the mixes that a residential development site should seek to deliver.

### Principle 7: Density Mix of Uses

- All residential development should contribute to the provision of balanced communities through the provision of a mix of residential densities, housing forms, sizes and tenures. Larger residential development sites will also be expected to deliver a complimentary mix of uses within a new residential setting.

### Plots

6.15 Plots are important elements in the character of an area. Their sizes, especially the widths along a street frontage are key determinants of the rhythm of buildings and spaces along a street, how active it will be and the grain of development in an area.

6.16 Streets with regular, clearly defined plot rhythms that are fine grain create the most interesting and attractive street scenes. Development that disrupts the rhythm of existing plots can create unattractive, inactive street scenes (Fig 7).

*Figure 7: sketch diagram illustrating perception of plot rhythm*

<sup>5</sup> [www.coventry.gov.uk/downloads/file/19652/lp42\\_coventry\\_shma\\_2012\\_-\\_gl\\_hearn](http://www.coventry.gov.uk/downloads/file/19652/lp42_coventry_shma_2012_-_gl_hearn)



#### **Principle 8: Plots**

- **New residential development will be expected to respond to the size, shape and rhythm of surrounding plot layouts.**
- **Plot boundaries to the front, side and rear will be expected to be clearly and strongly defined. Proposals with weak or absent plot definition and plot layouts that are out of context with the surrounding character will be resisted.**

#### **Parking**

6.17 Space to park cars can place a significant burden on the design of residential layouts. Balancing the expectations of residents and visitors for adequate parking spaces near to properties with the need to ensure parking does not unduly impact on the street scene and safety and amenity of people is a key consideration.

6.18 In order to create attractive and well-functioning layouts it is important that the space to park vehicles is carefully considered at the early stages of the design process.

6.19 This Council expects the parking standards to be adhere to\*\*\*

#### **General standards**

6.20 Coventry is a city dominated by its urban fabric and tree assets coupled with the ancient Arden landscape and it will be expected that parking solutions will reflect this nature with significant use of soft green landscaping. Parking solutions involving large areas of hard

surfacing will be resisted.

6.21 It is also expected that the quality of parking solutions will be high. Use of high quality hard and soft landscaping to provide appealing and functional parking spaces will be required. Developers will be expected to use porous surfacing for parking areas and will be encouraged to use different materials and colours to delineate parking bays and road carriageways.

6.22 Parking can be provided in a number of ways:

- On plot;
- In communal mews/parking courts; and
- On street.

6.23 The Council accepts that different parking layouts are likely to be required in different locations and developments may need a mix of solutions. Low density schemes, for instance will find it easier to predominantly accommodate parking on-plot whilst higher intensity schemes in more urban locations may need to use solutions involving undercrofts or on street provision. Whatever solution is used, it is important that it is high quality and that the residential layout is not visually and functionally dominated by parked cars.

*Figure 8: example pic showing use of materials to delineate parking bays*



**Principle 9: Parking**

**Parking layouts should be high quality and designed to:**

- Reflect the strong urban fabric and Ancient Arden identity of the city. All parking arrangements should be softened with generous soft landscaping and no design should group more than 3 **linear** parking spaces together, without intervening landscaping;
- Ensure developments are not functionally and visually dominated by cars;
- Maintain activity in the street without adversely affecting the attractiveness of the streetscene;
- Minimise impact on the amenity of residents;
- Unobstructed and inclusive access to front and rear of a property by 1.2m to provide futureproofing for all users
- Be safe, overlooked and convenient for users; and
- Be spaces that are visually and functionally attractive in the street scene.



*Figure 9: Ancient Arden: An interesting grouping of buildings that have grown and evolved over time with parking arrangements integrated well within the existing landscape.*

### Parking space standards

6.24 For details on the number and sizes of parking spaces in residential schemes developers should contact the Councils Highways team and the Coventry Connected SPD<sup>6</sup> to ascertain the adopted standards.

### On-plot parking

6.25 On-plot parking can occur to the front, side or rear of dwellings. It may include integral or stand-alone garages and carports.

<sup>6</sup>

[www.coventry.gov.uk/downloads/download/5195/coventry\\_connected\\_supplementary\\_planning\\_document\\_spd](http://www.coventry.gov.uk/downloads/download/5195/coventry_connected_supplementary_planning_document_spd)

6.26 The Council's preference is for parking to be to the side or rear where adverse impacts on the street scene and amenities can be more effectively managed. Where parking has to be provided to the front it is important that the visual impacts are mitigated as far as possible. Potential solutions include landscaping, staggered buildings, separation and use of boundary treatments. It is also important that buildings are set back far enough from the road to enable cars to be comfortably parked in front. Enclosure of front on plot parking areas with vegetation will be strongly encouraged.

6.27 On-plot parking generally requires many crossovers onto the highway. In heavily treed landscapes the landscape screen along plot boundaries is a key element of local character. In such locations a single shared drive may be required from the street to serve dwellings with on plot parking.

**Principle 10: Parking on-plot**

On-plot parking should **not be dominated by excessive frontage parking arrangements, generally be provided to the side or rear.** Where front of plot parking is proposed this should be enclosed with soft landscaping and not:

- Dominate the appearance of the plot or the street scene with extensive hard surfacing or multiple or over wide vehicle cross overs.
- Result in vehicles overhanging the pavement or lying hard up against habitable rooms.

**Parking Courts**

6.28 Communal parking courts are private car parking areas, typically positioned either to the front or rear of dwellings. Parking courts are used for flats and intense terraced housing.

6.29 Parking courts should be designed as attractive, busy, safe spaces in their own right.

*Figure 10: Images showing front parking with a variety of surface treatments and enclosed with soft landscaping*



#### **Principle 11: Parking courts**

- Car parking courts should be designed with active frontages and to be multi-purpose.
- Parking courts should be attractive places with high quality hard and soft landscaping.
- Dwellings with frontages onto streets should not have their main frontage to rear parking courts.
- Secure by design standards should be fully considered in the design of parking courts
- Where parking courts are provided to the front of development, they should be enclosed with strong soft landscape screens and not be dominant elements in the street scene

#### **On-street parking**

6.30 If well designed on-street parking can add to the vibrancy and variety of a street scene.

The Council's preference is for visitor and non-allocated parking to be provided on-street where possible and appropriate to local character.

6.31 Where on-street parking is proposed, then the street must be purposefully designed to accommodate it. Parking bays may accommodate parallel, perpendicular or angled spaces.

**Principle 12: Parking on-street**

- Where provided, on-street parking will be expected to be high quality in terms of layout and materials. On-street parking should not dominate the street scene and must be integrated with other street features. Positioning of on-street parking should not dominate adjoining plots and residential uses.
- Street car parking will be expected to be placed in a landscaped street setting utilising hard and soft features of a high quality.
- Where bays are provided, they should ~~generally not accommodate no more than exceed~~ a cluster of 3 ~~spacescars~~ **without landscape relief**.
- Where the width of the road has been increased to accommodate on-street parking designers will be expected to employ features such as increasing building height, street trees or other planting to ensure that the street is well enclosed.

Figure 11: 2 images showing i) a lack of space for on-street parking, no marking of parking bays and lack of softening landscaping creates an unattractive, poor street environment that is unsafe for pedestrians ii) attractive on-street parking solutions in a landscaped setting



### Defining Public/private space

6.32 It is important that the boundaries between public and private space are clearly defined. Poorly defined spaces create confusion as to ownership and use. This can lead to spaces becoming neglected, avoided and unattractive.

#### **Principle 13: Boundary Treatments**

- Where appropriate boundary treatments of at least 1m in height will need to be provided in residential environments to clearly define the boundaries of public and private space.
- Developments that leave space with unclear ownership will be resisted.

Figure 12: 2 images showing i) Poor definition makes it unclear what space is in private ownership and what is public ii) good definition of public/private spaces.



#### Informed by Environment

6.33 Where new development can call upon informative environmental opportunities in layout designs these should be integrated into the proposals. Positive response to features such as waterways (e.g., canals and rivers) field patterns and woodlands should be positively considered in order to ensure that proposals are positively responsive to the surrounding environment. Due consideration of relevant local plan policy should be embedded in design proposals.

## 7 Built Form

### Building positioning

#### Building lines

7.1 Front building lines help to define the street and the degree of street enclosure. Rear building lines are important in protecting neighbour amenity, especially at 2 storey levels. Where dwellings are detached or semidetached, building lines along the side walls can help maintain visual gaps and protect the amenities of neighbours.

7.2 The Council will expect new developments to give careful consideration to all forms of setbacks.

7.3 Occasional variation from a common front building line may provide opportunities to add visual interest to street scenes. Developers may consider using this as a design feature where positive opportunities arise and no adverse impact on neighbour amenity would be likely to arise.

Figure 13: image showing a front building line





#### **Principle 14: Building Lines**

- **Setbacks in new developments should complement the street scene, avoid impacting on neighbour amenity and allow for suitable landscaping and open space.**
- **Setbacks that erode character, street enclosure and amenity of neighbours will be resisted.**

#### **Solar & Sustainable design**

7.4 The Council strongly encourages designers to design buildings to minimise energy consumption by taking advantage of the sun's energy. This opportunity should be considered at the early stages of the design process.

7.5 Passive solar design involves orientating buildings to maximise the entry of low winter sun for passive solar heating. Facades with generous fenestration with no overshadowing need to be orientated buildings within 30 degrees of due south to gain from solar heating (Fig 14). When employing passive solar design designers will also need to

consider how to maximise solar collection during winter and minimise overheating during summer months.

7.6 Active Solar Gain uses building facades and roofs to collect solar energy for conversion into electricity or hot water. Any aspect within 30 degrees due south is ideal (Fig 15). The Council is supportive of active solar micro renewable technologies where they do not have a detrimental impact on the appearance of the building and street scene.

[7.7 Applicants should refer to the latest and emerging building regulations guidance in seeking to achieve best outcomes of embedded energy in construction, and energy efficiency measures.](#)

Figures 14: Principles of passive solar design

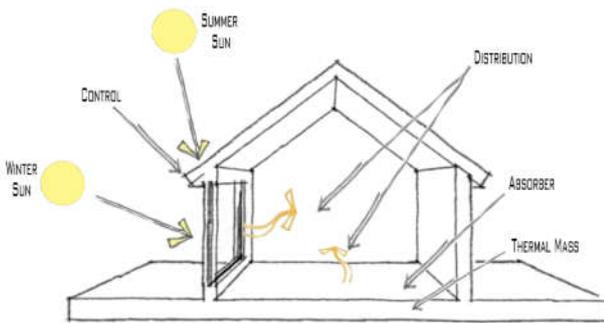
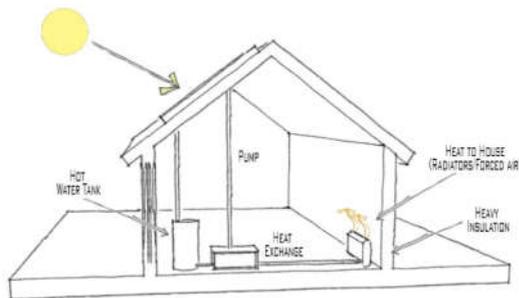


Figure 15: principles of active solar design principles



**Principle 15: Sustainable Design**

- The Council will expect new residential developments to make optimal use of natural light and warmth so as to minimise the use of energy for lighting and heating **where possible**.
- Proposals that fail to incorporate passive solar design will be resisted unless there is strong justification for not integrating it into a building or site.
- Developments that overshadow existing light dependant micro renewable technologies (e.g. photovoltaics, and solar hot water panels) on neighbouring properties will be resisted.
- **The integration of SUDS systems on site should always be considered**

**Building scale, massing & form height**

7.7 The height of a building has an important impact on the character and enclosure of a street scene. Buildings that are too low in relation to the width of a street provide low levels of enclosure and unsatisfying street scenes, whilst buildings that are too high in relation to the width of a street create dark, overwhelmed spaces that do not feel human scale.

7.8 Buildings that are out of context with their neighbours in terms of height may also create unsatisfactory visual and physical relationships. There is also a greater likelihood of an overly tall building having adverse impacts on residential amenity. Varied building heights can add interest to a streetscene and are encouraged as long as they are contextually appropriate in the Streetscene judged on their individual merits.

7.9 In general, ~~the~~ more rural and suburban areas ~~of the borough~~ tend to have building heights of 1 to 2 storeys with ridge heights of around 7.5 – 8m with occasional 3 storey status or focal point buildings. This low height is a strong defining element in the character of these lower density areas and the Council will seek to maintain this.

Figure 16: Images showing i) two story suburban residential accommodation and ii) taller residential development in the city center (flats ideal)



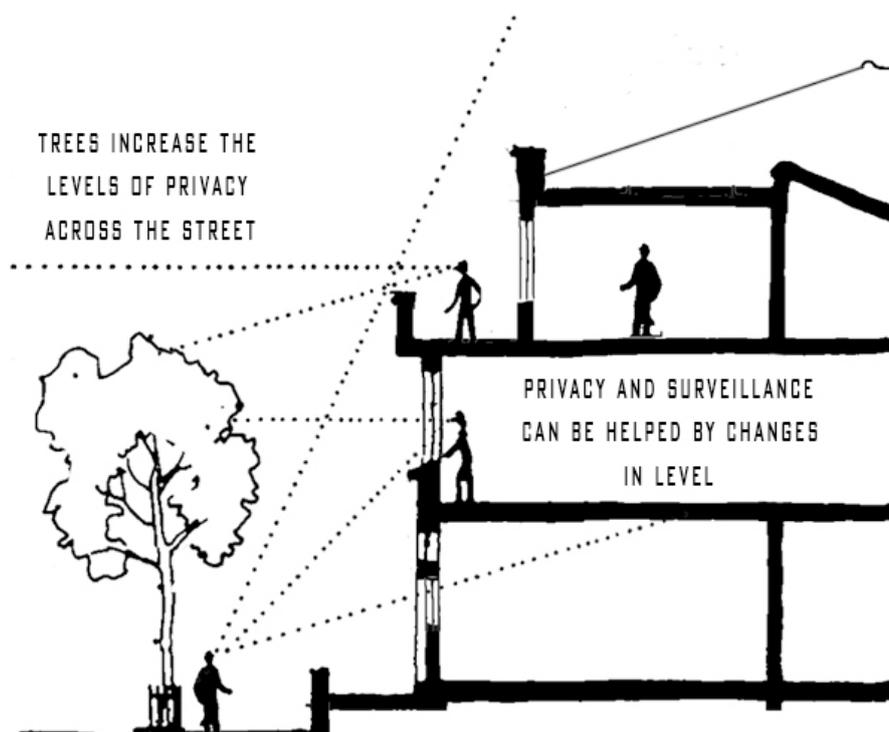


7.10 Building heights are more varied in tighter urban environments and can often be in excess of 3 storeys. In the city centre, residential buildings of 3 storeys or more will be encouraged, subject to impacts on street and residential amenities being satisfactorily resolved.

[7.11 Full assessments will be required where proposals may impact upon the significance and setting of heritage assets, where reference should be made to the LPA's associated conservation policy supplementary planning documents](#)

7.11 Where there is concern that a building height could adversely impact on the street or neighbour amenities designers should consider setting the upper floor/s back from lower storeys (Fig 17)

Figure 17: sketch diagram showing use of upper floor setback to maintain light to public and private realm



7.12 Developers may need to supply details of the street widths to building height ratios along with information on topography and the scale of neighbouring properties to enable the Council to assess how a proposal's height may fit into the street scene and impact on neighbour amenities.

#### **Principle 16: Building heights**

- The Council will expect buildings heights to help enclose the street without overwhelming it. In suburban and semi-rural fringe areas, building heights will generally be expected to be lower with occasional increases acting as visual focal points. Taller buildings will be more acceptable in city centre locations.
- Building heights should not result in **significant** adverse impacts on residential amenity and will be expected to enable a building to integrate well into its surrounding context.

#### **Scale & massing**

7.13 The footprint that a building makes on the ground, along with its height, and the amount of space around it determines the mass of a dwelling and the impact it has on the street scene.

7.14 Most existing residential areas have discernible patterns of massing and it would be expected that new development would reflect this pattern.

#### **Principle 17: Scale and Massing**

- New residential development should be responsive to the spacing, heights and building footprints of existing buildings, especially when these are local historic patterns such as the Ancient Arden landscapes.

#### **Roofscapes**

7.15 Rooflines, roof shapes and chimneys can have an important influence on the character of a street scene. Designers should consider this aspect of their proposals carefully and look to use the roofscapes they create to enhance buildings and townscapes. In higher intensity developments, developers will be expected to consider using roof spaces to provide green infrastructure.

7.16 In Coventry residential roof forms are based on pitches with hips and gables with various forms of dormers. More contemporary styles have explored flat and curved roof

forms.

7.17 Buildings that are overly deep were historically bridged with a double pitched roof. More contemporary approaches have been to propose a large element of flat roof behind short pitched to span the depth, often leaving unattractive and contrived roof forms, whilst utilising roof areas for additional spaces may be welcome, impact of this from all aspects must be taken into consideration.

*Figure 18: Image showing a corner plot which are particularly good locations to consider opportunities to introduce variations in roofscapes for visual interest and the creation of focal points*



#### **Principle 18: Roofscapes**

- **Proposals to introduce roof forms on residential development that diverge from the prevailing character of residential development will be resisted unless it can be demonstrated that the proposals would make a positive contribution to the streetscape.**
- **Where a building has been designed to reflect traditional forms and styles, roofscape should be similarly responsive to contextual precedents.**
- **Opportunities for roof terraces and balconies are welcomed, provided they are in keeping and context to their setting.**

#### **Active frontages**

7.18 There should be a strong relationship between the street and the buildings and places that frame it. Buildings should front onto the street and animate it with 'active' frontages to provide interest, life and vitality to public realm.

7.19 Active frontages mean:

- Frequent doors & windows, with few blank walls;
- Articulation of facades, with projections such as bays and porches; and
- Key habitable rooms fronting onto the street so that lively internal uses are visible from the public realm.
- Where schemes provide communal functions the use of highly transparent façade treatments can positively contribute to the delivery of active frontage.
- Where communal areas offer opportunity for public interaction/use would be welcomed

Figure 18.1 and 18.2 images showing i) a place with frequent doors and windows facing a street and ii) an inactive frontage with a blind façade at street level





### Minimum internal space standards

7.20 In 2015, the Government produced national internal space standards covering dwelling sizes and storage requirements<sup>7</sup>. Developers will need to take these into account when designing new residential developments.

#### **Principle 19: Space Standards**

- **As a minimum, the Council will expect new housing development to comply with the national internal space standards.**<sup>8</sup>

### Adaptable Homes

7.21 The Council considers it important that homes are flexible enough to adapt to the changing needs of occupants over time. Lessons may be learnt from historic housing forms such as Victorian and Edwardian terraces, which have proved very adaptable to modern living. National Design Guide standards look to create dwelling spaces that are accessible, adaptable and flexible.

<sup>7</sup> [www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard](http://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard)

<sup>8</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>

**Principle 20: Adaptable Homes**

- Buildings should be designed so that they have the ability to be adaptable to future needs.

**Architectural detailing**

7.22 Architectural detailing has an important role to play in setting the quality of a development. It is also important in setting or reinforcing the character of an area.

7.23 Examples of Architectural details may include windows proportions and style, doors, chimneys, eaves lines, cills, window to wall ratios, string courses, corners, fenestration, roof overhangs, colour, materials, gables & hips, pediments and brickwork styles (Fig 19).

*Figure 19: Image showing architectural features that may be considered when designing built form.*



7.24 The Council will expect developments to exhibit high quality architecture which reinforces the design vision for the scheme. The design should be carefully considered to create a rational, coherent whole with a visually pleasing balance of proportions. The use of high quality materials will be an added important element in creating an architecturally

satisfying development.

7.25 Developments can take a contemporary or traditional approach and can be designed with formal or informal styles. Attention to detail is vital to ensure that a development is successful. Buildings where the elements have been well put together will be pleasing to the eye, will last well and will complement the spaces they face, whatever the style of architecture.

7.26 This Council values architectural honesty. Pastiche designs that incorporate a mix of historic styles and detailing will generally be resisted as this typically creates a confused, poor quality visual appearance that does not specifically relate to any specific building style or age. If a traditional/vernacular language is being applied, it is important that details (such as windows and doors) are convincing. Where designers seek to mix architectural styles to create a contemporary approach, the Council will look for attention to detail and high quality, with strong architectural justification for the proposals.

7.27 Coventry has a strong legacy of public art, particularly from the post war period where public art formed an integral part of the redevelopment of the city, it is an important element in defining the character and identity of a city, locality or community. To build on this legacy, public art will be encouraged to be incorporated into new developments particularly where they have significance to local communities and reflect the character and history of an area.

*Figure 20: Local precedents of good building form and architectural detailing*



#### **Principle 21: Architectural Detailing**

- **Designers should use architectural detailing to create attractive buildings that positively contribute to the character and quality of an area. Buildings that employ architectural detailing that is unattractive, low quality or is not honest ([para 7.26](#)) or legible will be resisted.**

#### **Windows**

7.28 Windows are particularly important detailed features on a building. Designers will be expected to pay particular attention to window proportions, positioning, symmetry, frame thicknesses, recessing/projection and surrounding decoration (e.g brickwork arches). If a traditional vernacular design language is being applied it is important that details are as convincing, rather than paying lip service to precedent.

7.29 Window to wall ratios will also need to be considered. Public facing elevations that have large area of blank wall with limited amounts of glazing will be unacceptable.

7.30 Ground level windows that are distinctly taller than fenestration on upper floors help

to maintain balance and harmony and create pleasing compositions (Fig 7.6). Either recessing windows or enabling them to project beyond a façade provides an elevation with articulation and visual richness.

*Figure 21: Taller ground floor windows, symmetrical glazing that is well proportioned and taller on the ground floor than at upper levels.*



#### **Principle 22: Architectural Design**

- **Window design visible in the public realm should be high quality and create visually balanced and harmonious compositions.**
- **Poor quality window design will be resisted, especially where it will be visible in the street scene.**
- **Large areas of blank wall with limited glazing should be avoided on elevations visible from the public realm.**

## **8 Amenity**

8.1 Residential amenity, in the form of light, privacy, outlook and provision of outdoor amenity space, is a detailed but important design matter that has a very strong influence on the quality of resident's living environment.

8.2 New residential developments should provide future occupiers with high quality amenities and do not undermine the residential amenities of occupiers of neighbouring properties.

### **Privacy**

8.3 It is important that people are able to enjoy a degree of privacy which makes them feel comfortable inside their dwellings and also able to enjoy their private outdoor spaces without feeling overlooked or overheard. Areas of particular sensitivity are habitable rooms, such as the first 3m of private space behind a rear elevation and balconies or terraces which are the sole source of private outside space for a home.

8.4 A number of design solutions for maintaining privacy in new development and with neighbouring properties are available:

*Figure 22: image showing 20m separation distance*



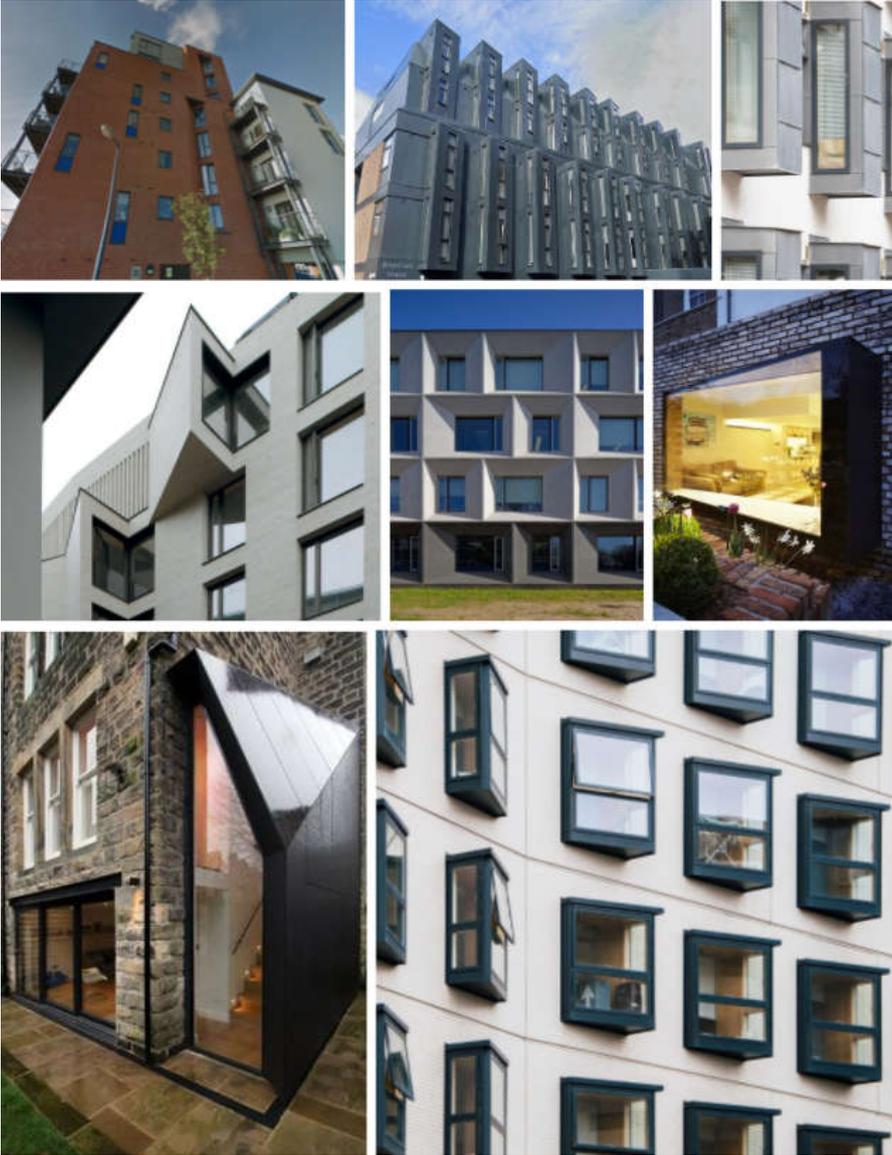
Distance:

- A minimum distance of 20m is this Council's generally accepted guideline for there to be no material loss of privacy between the rear of two storey buildings directly facing each other (i.e., a back-to-back relationship).
- Where residential development exceeds 2 storeys it would be expected that separation distances should increase this will be assessed on a case by case basis, taking account for local context
- For two storey rear to side relationships it may be possible to reduce the separation distance.
- However, there are instances where this minimum separation distance to maintain privacy may not be appropriate.
- Extra separation distance may be needed where there are significant changes in level between buildings.
- Equally, in more compact contexts ~~(in centre of towns and villages and infill plots)~~, or where the development is single storey, it may not be appropriate to provide the conventional separation distances.
- Alternative design solutions to maintain privacy will be needed in such instances.

Oblique angles:

- Positioning of buildings and angled windows to create oblique views are useful tools to reduce overlooking (Fig 22).
- Where buildings are angled at more than 30 degrees from each other separation distances can often be reduced
- Angled windows need to be designed to maintain adequate light levels to the rooms they serve.

Figure 23: images showing oblique window solutions



Window design:

- Roof lights, slit windows, high level windows and smaller vertically proportioned windows can be used to maintain privacy as well as provide adequate internal light levels.

Obscure glazing:

- Obscure glazing will be appropriate for bathrooms and exceptionally can be considered for other rooms provided that there is clear glazing to another window in the room which does not overlook another property. Primary Habitable spaces must always be primarily served by unobscured glazing.

Screening:

- Provided it does not create significant overshadowing small ground floor extensions, walls, fencing, hedges, trees and general landscaping can be used to provide screening to private spaces.

*Figure 24: Image showing screening for both front and rear gardens*



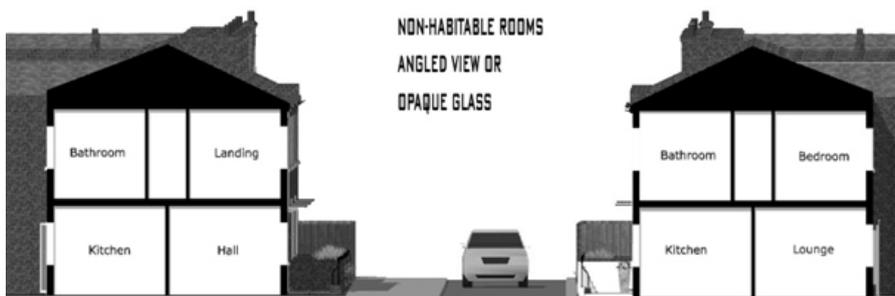
Gardens:

- Use of small front gardens can help maintain privacy for habitable rooms facing the street.
- Front gardens are also key contributors to character in many areas of the city and should be sought to be retained and respected in proposals.

Room layout:

- Intelligent layout design may be employed to offset direct relationships of habitable rooms, to contribute to maintaining privacy, and mitigate perception of visual intrusion into private spaces.

Figure 25: internal habitable room layout relationships



**Principle 23: Habitable Rooms**

- **New residential development should be provided with a reasonable degree of privacy to habitable rooms and sensitive outdoor amenity spaces.**
- **Developments which have a significant adverse effect on the privacy of neighbouring properties will be resisted.**

Figure 25: image showing small, enclosed gardens providing privacy to habitable rooms



### Outlook

8.5 Although there is no right to a view, residents should be able to enjoy good quality outlook to the external environment from habitable rooms, without adjacent buildings, walls, parked vehicles or storage materials being overbearing or visually intrusive. Outlook from the home to exterior spaces keep people in touch with their wider surroundings, the prevailing weather and the rhythm of the day and seasons. Contact with nature and the social life of the community people live in has been shown to be important in maintaining human health and mental wellbeing.

8.6 A poor outlook relationship is caused when the height and bulk of a development, or the proximity of parked vehicles, dense high vegetation or storage materials, significantly

dominate the outlook of a habitable room or area. Level changes can also create overbearing relationships and poor outlooks.

8.7 Poor outlook is also created when rooms are only served by:

- obscurely glazed windows;
- roof lights that only provide a small sky vista; and
- small oblique windows.

Such proposals that provide poor outlook are considered unacceptable.

### Daylight and Sunlight

8.8 Daylight and sunlight animate and enhance resident's enjoyment of interior spaces. Good natural light reduces the energy needed to provide light for everyday activities, while controlled sun penetration can also help to meet part of the winter heating requirement.

### Daylight access

8.9 It is important for the maintenance of people's health and well-being to ensure that habitable rooms in people's homes are well lit by natural daylight to facilitate a range of daily activities. It is possible for people to manage light levels in dwellings if there is too much daylight but impossible to do anything about it if there is too little. Building Regulation requirements will set the standards for internal illuminations in new dwellings but it is also important that designers consider lighting of outdoor spaces and the impact of the development on the amount of daylight reaching habitable rooms and external spaces of neighbouring dwellings.

#### **Principle 24: Daylight and Sunlight Outlook**

- **All habitable rooms should maintain at least one main window with an adequate outlook to external spaces where nearby man-made and natural features do not appear overbearing or visually intrusive.**

8.10 Design solutions to achieve good quality internal lighting of new homes include:

- providing glazing areas in habitable rooms that is not less than 20% of internal floor area of room;
- dual aspect dwellings (Fig 24); and
- Ensuring habitable rooms are served by glazing that has a vertical sky component of no less than 27%.

Figure 24: sketch diagram to show floorplan and elevation for a dual aspect dwelling



8.11 One or all of these solutions may be required to ensure people will have comfortable light levels in their habitable rooms.

8.12 Potential design solutions to prevent material loss of daylight to neighbouring windows and overshadowing of habitable external spaces include:

- Applying a 25 degree vertical angle from a point 2 m above the floor at the façade is not obstructed. This typically results in separation distances of 10m; and
- Avoiding obstruction to light by ensuring that the centre of an existing window serving a habitable room does not fall within 45 degrees of a line drawn from the edge of an extension or a new development (Fig 26).

The 45 degree rule is applicable to extensions exceeding 2.5m in height Designers should note that the 45degree rule is only an indicator and the acceptability of a development proposal will also be dependent on ground levels on site and the orientation of buildings.

Figure 26: diagram to illustrate the 45 degree rule



### Sunlight access

8.13 Provided it can be controlled, people enjoy sunlight and likewise, its absence can have a detrimental effect to health and wellbeing. Not only does sunlight have beneficial health effects for people, it also has the potential to reduce energy consumption in homes.

~~Neighbours will often be particularly distressed if new development threatens their existing private sunny spaces.~~

8.14 Accordingly, when drawing up their plans, developers should consider the needs of both new and existing neighbouring development to retain sunlight in habitable spaces. ~~This includes both indoor and outdoor spaces.~~ The needs for people who spend a large proportion of their day indoors, demand particular consideration.

8.15 Potential design solutions to provide good quality solar access include:

- Providing for direct sunlight to enter at least one habitable room for part of the day through-out the year. Dual aspect dwellings will assist with this.
- Providing private external spaces (patios, gardens, balconies, roof terraces) that receive direct sunlight for part of the day in the period between 1st April and 30th September.

8.16 Sunlight has a significant impact on thermal comfort and energy consumption. In winter it can make an important contribution to heating, but excessive solar gain can cause discomfort in summer. Careful design can control sunlight to maximise the benefits of solar access whilst minimising overheating.

8.17 Where there is doubt about the quality of daylight or sunlight access to new dwellings, or the maintenance of light access to existing neighbouring development, developers may be required to produce plans illustrating sky components and shadow paths at the winter solstice and spring/autumn equinox.

**Principle 25: Daylight and Sunlight**

- The occupants of new dwellings should be provided with good quality daylight and sun access levels to habitable internal rooms and external spaces.
- Dual aspect dwellings are strongly encouraged. Where single aspect dwellings are proposed, developers should demonstrate how good levels of ventilation, daylight and sun access will be provided to habitable spaces.
- Single aspect residential units that are north facing should be avoided.
- Developments should not result in occupants of neighbouring dwellings suffering from a **material-significant** loss of daylight and sun access.

**Private outdoor amenity space**

8.18 This Council considers the provision of high quality, private open space to serve homes to be a necessity. This form of space serves a number of important household functions including allowing people enjoying contact with nature as part of their home life, clothes drying, growing food and pursuing domestic leisure activities.

8.19 In the context of increasing intensification of residential development and the specification of minimum internal space standards, it is important to ensure that this private outdoor amenity space is provided in adequate amounts and is of a high quality. Accordingly, the Council has established minimum space standards for the provision of external private amenity space in all forms of property. Developers will be encouraged to exceed these standards where the site allows for this. Where developments are not able to meet the minimal outdoor amenity space standards the Council may consider accepting lower standards provided this is robustly justified and it can satisfy itself that the outdoor amenity space provided will be of high quality.

**Private outdoor amenity space standards for houses**

8.20 The amount of garden space (including front, side and rear spaces) may vary widely but new developments must provide for a minimum amount of private amenity space in the form of gardens. The minimum amount may vary depending on the context of the house.

Homes with private amenity spaces facing predominantly north may need to provide larger private gardens than those facing the sun with a predominantly southern orientation (Figure 27 & Table 3). For conversion schemes, private outdoor amenity space will be considered on case by case basis depending on the type of use being sought.

Table 3: Guidance mMinimum outdoor private amenity space size standards for houses (sq m)

House size	Minimum standard/unit for outdoor amenity spaces facing predominantly south (sqm)	Minimum standard/unit for outdoor amenity spaces facing predominantly north (sqm)
1 bed	40	50
2/3 beds	55	65
4+ beds	70	85

### Outdoor amenity space standards for flats & maisonettes

8.21 Given the benefits of people having access to good quality private outdoor amenity space, especially in more intense living environments, the Council will expect developers of flatted proposals to provide high quality outdoor amenity space which is an important visual and functional focal point of the design.

#### Principle 26: Outdoor Amenity – Private Garden Space

Private outdoor garden spaces should, wherever possible and feasible:

- Screened by fences or walls to provide privacy;
- Receive direct sunlight;
- Able to accommodate bin and cycle storage;
- Not be heavily overshadowed by trees and tall hedges;
- Be inclusive of access not dependent upon routes through internal spaces
- Directly accessible from habitable rooms; and
- Have level access from the home.
- Garden spaces should not be that are separated from the dwellings they serve ~~will~~ generally be resisted.

### Communal amenity space

8.22 Designers should provide attractive communal amenity space which serves all residents. All too often, communal amenity spaces in flatted developments become

neglected, unused low-quality spaces which serve flat occupants poorly and make little positive contribution to townscapes.

8.23 Where space at ground floor level is limited, innovative solutions such as the provision of communal garden space at first floor levels or above will be encouraged.

**Principle 27: Outdoor Amenity – External Communal Space**

External Communal amenity space should be:

- connected to the building;
- easily accessible to all residents;
- screened from public view;
- free of vehicles;
- located to receive sunlight for a substantial part of the day; and
- Actively overlooked to provide surveillance and security.

**The Councils Open Spaces SPD provides more information on the provision of public open spaces as part of new development**

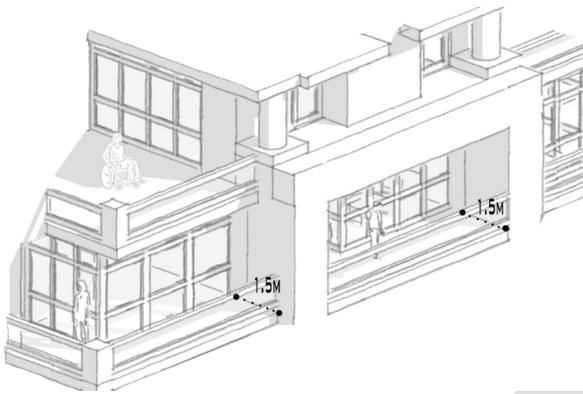
**Private amenity space for flats**

8.24 Private outdoor amenity space on flatted developments is also considered important, especially in tight urban environments and the Council will expect this space to be provided, particularly in new build developments. Private communal space can take the form of small gardens for ground floor flats and private balconies for flats above ground (Figure 28).

8.25 The provision of private amenity for all residents will be expected, however conversions will be considered on a case-by-case basis and will be expected to provide alternative outdoor amenity provisions where private amenity is unable to be delivered subject to sufficient justification.

8.26 In many respects, this private outdoor space is considered more important for people than communal space and thus it is important that it is high quality. Equally it is important that this private outdoor space does not compromise the privacy of adjoining dwellings

*Figure 28: Illustration of private amenity space in apartment design.*



**Principle 28: Outdoor Amenity – Apartment Schemes**

Flatted developments will be expected to provide private outdoor amenity space for each unit. **Wherever possible, All** ground floor flats should have access to a well-defined private area of amenity space which:

- Directly adjoins and is accessible from the flat;
- Has a minimum depth of 3m;
- Is the same width of the dwelling it serves;
- Is clearly identified by boundary treatments, including railings, low wall or a hedge; and
- Has a privacy screen between dwellings.

Unless conservation, privacy, ~~design or amenity or heritage~~ issues negate against the use of balconies, all flats above ground floor should be provided with balconies which:

- Are a minimum of 1.5m deep;
- Are wider than their depth; and
- Provide for privacy. Screens, recesses and orientation are potential design solutions to provide for this.

~~Predominantly north facing balconies with no access to sunlight during the year, or balconies in close proximity to adjoining main roads which will be materially affected by noise and air pollution will not be considered to have fulfilled the obligation to provide outdoor amenity space for flat occupants.~~

**Private outdoor amenity space standards for Residential Care Homes**

8.27 Residential Care Homes will be expected to provide private amenity space at the same level as flatted developments. Usable, high quality private outdoor amenity space will be required for all new Residential Care Home developments.

**Principle 29: Outdoor Amenity – Residential Care Homes**

- Usable, high quality private outdoor amenity space will be required for all new Residential Care Home developments.

DRAFT

## 9 Curtilage Development

### Boundary treatments

9.1 Boundary treatments are important in helping to define defensible space, establishing the boundaries between public and private space and setting the character of a street.

#### 9.2.9.2 Strongly defined boundaries help to convey ownership and maintenance

responsibility, privacy and home security. The absence of clearly defined boundaries, between public and private space can lead to confusion over ownership and responsibility leading to neglect and poor quality spaces between buildings and public realm.

#### 9.3 'Secure by design standards should be referenced in design development, and the authority recommend early liaison with secure by design officers.

9.3 The cumulative effect of boundary treatments in a street is a very significant component of street character and quality. Good quality boundary treatments define the pattern of plots and frontages along a street and create visual interest through the provision of rhythm and variety of materials and form.

*Figure 29: boundary treatments helping to define the plots and create strong unified character*



9.4 Poor quality boundary treatments erode street character and quality and can create environments that feel unsafe. This can result from:

- A lack of strong front and side boundary treatments;
- Absence, or very weakly present boundary treatments;
- Partial removal of boundary treatment to accommodate parking;
- Erosion of existing boundary treatments by the insertion of ill-considered new styles of treatments that are out of keeping;

**Formatted:** Font: (Default) Arial, Font color: Text 1

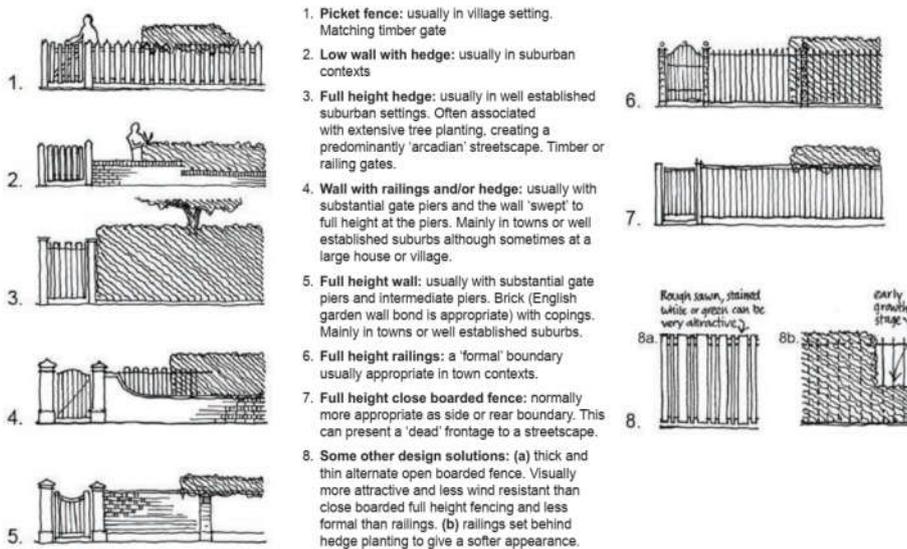
**Formatted:** List Paragraph, Outline numbered + Level: 2 + Numbering Style: 1, 2, 3, ... + Start at: 2 + Alignment: Left + Aligned at: 0 cm + Indent at: 0.63 cm

- Long unbroken stretches of high, blank walls or fences;
- Use of poor quality boundary treatments materials (e.g. close boarded fencing) fronting public realm areas.

9.5 Given the importance of boundary treatments in setting the quality of a development and streetscene, the Council will expect developers to consider this aspect of their designs very carefully and provide a high quality design response. Particular consideration will need to be given to boundaries which are visible in the public realm. Figure 30 illustrates the typology of boundary treatments to public realm areas that the designers should draw upon when developing their schemes.

9.6 Where existing boundary treatments make a consistent and positive contribution to the character of the street, this design should be adhered to.

Figure 30: Examples of acceptable forms of boundary treatments to public realm areas



### Principle 30: Boundary Treatments

- All boundary treatments will be expected to be high quality and reflect the character of the development and the surrounding context.
- Treatments to the public realm will be expected to be visually interesting and **very** high quality. Long lengths of **continuous and unbrokenunrelieved** hard boundary treatments will be resisted.
- To a front garden, boundary treatments predominantly in excess of 1.2m will be discouraged.
- Wooden shiplap or panel fencing is considered an unacceptable boundary treatment when visible from the public realm.

### Provision for Cycles, Bins & meter cabinets

#### Waste and recycling storage

9.7 It is important that the design of bin storage is considered at an early stage in the design process.

9.8 The Council currently has a fortnightly domestic waste collection service. Normal householder bins are as follows:

	Refuse Collection (fortnightly)	Recycling Collection (fortnightly)	Food and Garden Waste Collection (fortnightly)
<b>Single Household</b> (Individual property)	240 litre green lidded wheeled bin	240 litre blue lidded wheeled bin	240 litre brown lidded wheeled bin, 5 litre food waste caddy
<b>HMO</b> (As defined in the Waste Policy)	240 litre green lidded wheeled bin	240 litre blue lidded wheeled bin	240 litre brown lidded wheeled bin, 5 litre food waste caddy
<b>Flats or Apartments</b> (Properties containing several individual properties within one building)	Share Euro style containers (See Annex 2)	Share Euro style containers (See Annex 2)	240 litre brown lidded wheeled bin (shared use of residents – not for commercial use i.e. by paid gardener)

9.9 Shared bins may need to be provided in flats or care homes.

9.10 It is important that the waste storage requirements are handled in purpose built spaces that are sufficient in size, easily accessible and which do not generate offensive smells or negatively impact on a street scene's character and quality.

9.11 The Council's strong preference is for refuse storage areas to be located to the rear or side of dwellings where they are invisible in the public realm. Where rear and side storage opportunities are not available, well considered frontage storage may be acceptable should it be evident that the solution delivers a high-quality outcome.

9.12 Early discussion with the LPA during pre-application discussions is recommended so that waste management is considered as an integral part of the design process. Distances beyond 25m between collection point and storage points will be resisted.

*Figure 31: example of discrete sustainable bin storage design*



### Cycle storage

9.13 The Council actively supports the development of cycling as a sustainable transport mode. Good quality space to accommodate the storage of bikes is expected to be specifically designed in at an early stage for each dwelling. This can be external or internal space but it is important that cycle parking is additional to space used for other uses, e.g. balconies, lobbies and hallways. Cycle storage facilities on balconies or in hallways will not be acceptable.

9.14 Cycle storage facilities should be easily accessible to occupiers and wherever possible, be integral to the design of the residential development. Where external cycle facilities are provided, they should be constructed of durable materials, relate to the design of the main

residential building, be easily accessible and not have a detrimental impact on the street scene.

Figure 32: cycle storage solution that reflect and blend with the house design



### Meter cabinets

9.15 It is recognised that utility companies prefer meter cabinets to be located on external elevations that are easily accessible from the street. However, it is also important that the meter cabinets do not undermine the attractiveness of buildings and the street scenes by virtue of their design and positioning.

9.16 Meter boxes need not be standard white units and the council would encourage a bespoke approach that fits in with the character of the building they are positioned on and the wider area. However, they should be designed to and positioned to ensure a balance between accessibility and unobtrusiveness.

### Principle 31: Meter Cabinets

- All new residential development will be provided with meter cabinets and space for storage of cycles & bins in a manner that functions well and does not compromise the visual amenities of the building and street scene.

### Hardstanding and vehicle cross-overs

9.17 If not carefully designed, driveways and hardstanding areas can create hard, unattractive environments that break down the rhythm of plot definitions and landscaping,

increase flooding and reduce biodiversity.

9.18 Provision of new vehicle crossings can result in a loss of front boundary definitions and if inadequate space is available in front of a dwelling for parking, result in vehicles:

- hanging over pavement areas, potentially causing problems for pedestrians; or
- lying hard up against habitable rooms, affecting outlook.

9.19 It is important for this Council that new vehicle crossings and areas of hardstanding on residential properties do not contribute to a deterioration of the streetscene, a loss of biodiversity, reduced pedestrian safety or increased flooding.

9.20 Potential solutions for minimising adverse impacts of hardstanding include:

- using porous materials such as gravel or blocks;
- keeping driveways and parking areas only as large as necessary;
- Integrating areas into the overall landscaping schemes;
- Ensuring the spaces is enclosed as much as possible by soft planting, walls or other boundary treatments which are in keeping with the character of the area.

**Principle 32: Vehicle crossings and hardstanding**

- **New hardstanding areas will be expected to be constructed in porous materials and cover only the minimum space necessary. Hardstanding that is not designed as part of a soft landscaping scheme, or which results in a deterioration of the streetscene, will be resisted.**
- **Hardstanding should be considered to meet the needs of both vehicle and pedestrian use, providing definition of routes, and maintaining unobstructed access to dwellings.**

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)**

New Residential Design Guide SPD Consultation Summary

Residential Design Guide SPD:

<b>Comment Reference</b>	<b>Respondent</b>	<b>Page/Para Reference</b>	<b>Consultation Response</b>	<b>Officer Summary</b>	<b>Proposed Change to SPD</b>
RDG1	Scrutiny Board	Principle 6: Second Bullet Point	The wording 'Provision of generous Open Space' too vague	This SPD does will not specify outdoor space standards, however, accept cross reference to policy would be beneficial to aid clarity of requirement.	Wording revised to omit 'generous' and add link to CCC Open Space SPD
RDG2	Scrutiny Board	Principle 7	The wording for large mixed-use schemes too vague in definition of what would be appropriate uses	Principle seven seeks to promote larger residential schemes bringing forward supporting uses to aid positive community creation, such as small-scale retail. However, officers advise against the specification of use classes in this principle as such referencing can become outdated.	Wording revisions within principle seven "complimentary mix of uses within a new residential setting"
RDG3	Natural England	General	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment	Noted and welcomed	No action required

RDG4.1	Seven Trent	General	<p>“Severn Trent is largely supportive of this document, however we would note that there is not much inclusion of how Sustainable Urban Drainage (SuDS) and blue green infrastructure can be included within New Residential Development design. We would encourage you to include an additional section relating to SuDS design as part of development design.”</p>	<ul style="list-style-type: none"> <li>- Agreed additional reference to SUDS systems to be incorporated, whilst the SPD is design focused, due consideration of technical requirements can also yield positive design outcomes.</li> </ul>	<ul style="list-style-type: none"> <li>- Additional bullet point within principle 15 ‘sustainable design’ added to ensure consideration of SUDS systems.</li> </ul>
RDG4.2	Seven Trent	Principle 4	<p><u>Principle 4:</u></p> <p>“Severn Trent is supportive of this principle relating to the appropriate use of trees, vegetation, gardens and open spaces, however we would encourage you to go further by acknowledging the multiple benefits (drainage, biodiversity, amenity) that can be achieved by including good SuDS design within this area. For example good design of trees (if newly planted) could include tree pits which can help to sustainably manage surface water at source.”</p>	<ul style="list-style-type: none"> <li>- Agreed that street design considers the integration of SUDS systems. Biodiversity considerations are outside of the scope of this SPD, however reference to opportunity agreed with.</li> </ul>	<ul style="list-style-type: none"> <li>- Additional bullet point principle inserted at Principle 4 to embed the consideration of SUDS schemes in street design.</li> </ul>
RDG4.3	Seven Trent	Principle 32	<p><u>Principle 32:</u></p> <p>Severn Trent is supportive of this principle particularly use of porous hardstanding materials.</p>	<ul style="list-style-type: none"> <li>- Noted and welcomed</li> </ul>	<ul style="list-style-type: none"> <li>- No action required</li> </ul>

New Residential Design Guide SPD Consultation Summary

RDG5.1	Historic England	General/Paragraph 2.4	<p><u>Paragraph 2.4:</u></p> <p>“Firstly, we welcome the inclusion of the reference to the Council’s conservation area character documents, and that this SPD should be read in conjunction with them (para.2.4).”</p>	- Noted and Welcomed	- No action required, however minor rewording at 2.4 to further reinforce link to local plan policy documents of design and heritage matters.
RDG5.2	Historic England	Paragraph 4.2	<p><u>Paragraph 4.2:</u></p> <p>““We note that at para.4.2 the SPD references the NPPF’s advice on planning authorities preparing design codes, consistent with the principles set out in the National Design Guide and National Model Design Code. However, we note that the SPD does not then elaborate on this...” (Comment continues below)</p>	- Para 129 (NPPF): “Design guides and codes CAN be prepared...” NPPF does not mandate that design codes are needed, merely provides guidance on how this can be done.	- As below
RDG5.3	Historic England	Table 2: Design Process	<p><u>Table 2: Design Process:</u></p> <p>“...as there is no mention of Design Codes within ‘Table 2: Design Process’, or any commitment within the document to the Council preparing Design Codes to guide residential development schemes. Therefore, we suggest that this section of the SPD is reviewed.”</p> <p>““Notwithstanding the above, Historic England supports the stepped approach advocated in ‘Design Process Expectations in Coventry’ (Table 2, p.10) for larger residential schemes, and particularly the inclusion of tools such as ‘Vision setting’, ‘Concept plans’ and ‘Master planning’.</p>	- Para 128 (NPPF): “ <i>To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code</i> ”. This confirms that the production of a design	- Additional reference to consideration of heritage assets and their setting inserted at 5.5 ‘Vision setting’ within ‘key identifiers of local context’ which require consideration.

			Where development may impact on the significance of a heritage asset, and/or its setting, we would encourage a heritage led masterplanning approach to ensure that the masterplan is responsive to the local context and heritage of Coventry”	<p>guide is sufficient, and does not therefore necessitate the production of a design code.</p> <ul style="list-style-type: none"> <li>- <i>Para 129 (NPPF): “Design guides and codes CAN be prepared...”</i> NPPF does not mandate that design codes are needed, merely provides guidance on how this can be done.</li> <li>- Works to produce future, specific design codes therefore sit outside of the scope of this SPD</li> <li>- Agree that heritage assets should form key design informative in design outcomes, additional reference to be added in guidance.</li> </ul>	
RDG5.4	Historic England	Principle 16	<p><u>Principle 16 Building Heights:</u></p> <p>“With regard to <i>Principle 16: Building heights</i>, we note that the SPD advises that ‘<i>taller buildings will be more acceptable in city centre locations</i>’. However, we suggest that a caveat should be included here, to require consideration of the impact of building heights</p>	<ul style="list-style-type: none"> <li>- Agree additional reference to heritage impacts would be beneficial, whilst drawing reference to conservation specialism SPD’s</li> </ul>	<ul style="list-style-type: none"> <li>- Additional wording added at 7.11 stating full assessment required when impacting upon heritage assets and linking to LPA’s</li> </ul>

New Residential Design Guide SPD Consultation Summary

			on the significance of heritage assets and their settings, where relevant.”		supporting policy and SPD base.
RDG5.6	Historic England	Architectural Detailing, Architectural Design, Principle 28 Outdoor Amenity	<p><u>Architectural Detailing/Architectural Design/Principle 28 Outdoor Amenity:</u></p> <p>“We welcome the guidance contained in the sections of the SPD on ‘<i>Architectural Detailing</i>’ and on ‘<i>Architectural Design</i>’ and are pleased to see that conservation and heritage issues are included as a consideration for the provision of balconies within <i>Principle 28: Outdoor Amenity</i>”</p>	- Noted and welcomed	No action necessary
RDG6.1	Sports England	Paragraph 6.5	<p><u>Paragraph 6.5:</u></p> <p>Sport England are supportive of the expectation that new development will connect into and extend the surrounding route and space network in a high quality, safe and legible way.</p> <p>The provision of lit high quality footpaths/cycleways acting as corridor for green would encourage residents to be more physically active in a safe environment which is supported by Sport England’s Active Design Guidance. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a></p>	- Noted and welcomed	No action necessary

RDG6.2	Sports England	Principle 3	<p><u>Principle 3: Connectivity:</u></p> <p>Sport England considers that the addition of lit footpaths/cycleways should be incorporated within the principles to align with paragraph 6.5.</p> <p>Sport England are supportive of the promotion of active travel through pedestrian, cyclists and public transport connection being given the highest priority.</p>	<p><u>Principle 3: Connectivity:</u></p> <p>Support introduction of additional principle of lighting and surveillance to cycle and pedestrian routes to promote safe use.</p>	<p>Additional wording at principle 3 added to promote well lit and surveilled cycle and pedestrian routes.</p>
RDG6.3	Sports England	Principle 4	<p><u>Principle 4 Street Design:</u></p> <p>Sport England are supportive of Principle 4:Street Design with it sharing similarities with Sport England’s Active Design Guidance Principles Active Buildings; High Quality Streets and Spaces; Connected Walking and Cycling Routes; Walkable Communities and Appropriate Infrastructure</p>	<p>Noted and welcomed</p>	<p>No action necessary</p>
RDG6.4	Sports England	9.13 Cycle Storage.	<p><u>9.13 Cycle Storage:</u></p> <p>Sport England notes the support for the development of cycling as a sustainable transport mode though there is no corresponding Principle.</p> <p>The Council actively supports the development of cycling as a sustainable transport mode.</p>	<p>Noted and welcomed</p>	<p>No action necessary</p>

New Residential Design Guide SPD Consultation Summary

RDG7.1	Rainer Developments	General	<p><u>General:</u></p> <p>The Council will be aware an SPD must supplement a Policy in the Local Plan. If it goes beyond the definition of a SPD, it is a Development Plan Document and the Council can only adopt it by submitting it to the Secretary of State for independent examination and adopting it as such (as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012).</p> <p>Whilst the draft SPD is seeking to provide further guidance in respect of design and specifically Policy DE1, it is apparent that some of the proposed requirements go beyond those of Policy and therefore exceed what is allowed for in the Town and Country Planning (Local Planning) (England) Regulations 2012)</p>	<p><u>General</u></p> <p>Suggestion is made that the document may exceed what is applicable in an SPD and moves to areas where a Development Plan Document may be applicable</p> <p>This SPD only provides guidance and recommendations that the council would encourage to be included in new residential development proposals, it does not however establish new mandatory requirements.</p>	No action required
RDG7.2	Rainer Developments	Principle 16	<p><u>Principle 16: Building Heights:</u></p> <p>As drafted, the principle suggests that building heights should not result in any adverse impacts on residential amenities, however this is inconsistent with national policy in the National Planning Policy Framework which only references significant adverse impacts.</p> <p>There is sometimes an inevitability that development may have an adverse impact on amenity. The question is whether that adverse</p>	<p><u>Principle 16: Building heights:</u></p> <p>Impact to residential amenity is a key identifier of acceptable development proposals, however it is accepted that judgements are made in the context of local situation and precedent and that such impacts are taken in the overall balance of decision making. As such the insertion of 'significant' is accepted as a revision.</p>	Principle 16 insertion of 'significant'

			<p>impact is significant or not. As such, Representations to the draft Design Guidance for New Residential Development Supplementary Planning Document it is recommended that the word “significant” in added to Principle 16 so the second bullet point reads:</p> <p>“Building heights should not result in significant adverse impacts on residential amenities and will be expected to enable a building to integrate well into its surrounding context.”</p>		
RDG7.3	Rainer Developments	Principle 19	<p><u>Principle 19: Space Standards:</u></p> <p>The National Planning Policy Framework is clear at Paragraph 131 f) that “planning policies and decisions should ensure that [...] developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”, with Footnote 49 adding that “planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, <u>where the need for an internal space standard can be justified</u>” (underlining added for emphasis).</p> <p>Insufficient justification is provided for the need</p>	<p><u>Principle 19: Space Standards:</u></p> <p>The local authority wish to promote the best standards of residential development in the city and as such promote the use of NDSS space standards as a minimum expectation in forthcoming residential development. Whilst accepting that these standards being introduced as a formal requirement would need to be contained within local plan review, the inclusion of the expectation of best practice is seen as appropriate to remain in the SPD and indeed accord to established expectations in affordable housing SPD.</p>	No revision

			<p>to impose the optional nationally described space standard, and in any case this requirement would need to be established in a Development Plan Document such as the Local Plan rather than through a SPD, particularly where there is no Policy support.</p> <p>As such, it is recommended that Principle 19 is removed, or at the very least amended to provide support for residential development proposals which adhere to the nationally described space standard, but recognise that such a standard is not necessary in all residential schemes.</p>		
RDG7.4	Rainer Developments	Principle 28	<p><u>Principle 28: Outdoor Amenity:</u></p> <p>Principle 28 adds that predominantly north facing balconies or balconies in close proximity to main roads which will be materially affected by noise and air pollution will not be considered favourably. In effect, if applied rigidly, the Principle would remove the ability to develop above ground floor level in large parts of the City. This is not consistent with National and Local Policy that requires development to make efficient use of land.</p> <p>Residential amenity is covered in the Local Plan by Policy H3: Provision of New Housing as opposed to Policy DE1, with criterion 3 of Policy H3 stating that “a suitable residential environment will include safe and appropriate</p>	<p><u>Principle 28: Outdoor Amenity:</u></p> <p>The introduction of an expectation of the delivery of private external amenity space to flatted developments in the city is promoted as a positive development of guidance post the experience of the Covid Pandemic and the highlighting o the importance of private external amenity space in mental wellbeing of residents which is often not able to be met through the delivery of communal spaces.</p> <p>Officers accept however that there will be occasion that the use of balconies may not be</p>	<p>Exclusions from expectation of private external space of amenity and design added considerations into principle 28.</p> <p>Further to inclusion of amenity consideration in exceptions, wording removed in respect of roadside and north facing situations to allow individual assessment.</p>

			<p>access, <u>have adequate amenity space and parking provision</u>, and be safe from environmental pollutants such as land contamination, excessive noise and air quality issues” (underlining added for emphasis).</p> <p>Whilst the provision of balconies may be appropriate for some flatted developments as a way of ensuring adequate amenity space, it is not the only solution. In many instances, alternative provision such as designated communal indoor and outdoor amenity space may be more suitable in making more efficient use of the land and providing a better design solution as opposed to designing private space with 2m screen walls to the rear of ground floor flats. It may also be a better design solution for the appearance of the building not to have balconies.</p> <p>In any case, imposing such a specific and onerous requirement in this SPD goes beyond the requirement of the Policy.</p> <p>If the Council are to retain a specific requirement for balconies, it is recommended that Principle 28 of the draft SPD is revised to provide greater flexibility for circumstances where it is not appropriate. Conservation, privacy, or heritage reasons are already listed as an exception to the standard, but this list would benefit from expanding to include design, viability, and density.</p>	<p>appropriate to local context and as such have inserted ‘design and amenity’ as further potential exceptions to the expectation where cases for such exceptions can be individually assessed in forthcoming proposals. Considerations of viability are seen to sit outside of the scope of a design guidance SPD.</p>	
--	--	--	--	---	--

New Residential Design Guide SPD Consultation Summary

RDG 8.1	Coventry Green Party		<p>We welcome this new guidance for housing developers. In particular, we applaud its advocacy of both active and passive solar designs as they go well beyond the minimum requirements set out in the current uplift to the Building Regulations. We are also pleased to note that the SPD encourages designers to protect and enhance the green character of our streets.</p> <p>However, we believe the guidance could both provide more clarity on those design systems and contain a much stronger statement on the vital role of the green infrastructure in making our urban environment more resilient in the face of the climate damage we are witnessing now.</p>	<p>Noted and welcomed</p> <p>Whilst the SPD advocates the inclusion of renewable energy systems, technical guidance on such systems cannot be given within the design led SPD and would therefore defer to the evolving building regulation system.</p> <p>Green infrastructure considerations are embedded in policy DE1 of the local plan stating 'green infrastructure should be considered in the earliest stages of the design process, and further referenced in the SPD to reinforce this at points 6.5, 6.7, 6.12 and within principle 6.</p>	No action necessary
RDG 8.2	Coventry Green Party	Principle 15	<p><u>Principle 15</u></p> <p>We recognise that active and passive solar designs offer a viable alternative to the, perhaps, more well established passivhaus standard. So, we welcome the statement in Principle 15 that the Council will “resist” any proposals that fail to incorporate passive solar design unless there is a “strong justification” for doing so and that it is “supportive of active solar micro renewable technologies”</p>	Noted and welcomed	No action necessary

RDG 8.3	Coventry Green Party	Paragraph 7.4 & 7.5	<p><u>Paragraph 7.4 &amp; 7.5 and Figures 14 &amp; 15</u></p> <p>However, we think that both the written guidance (in paragraphs 7.4 and 7.5) and the illustrations (in figures 14 and 15) understate quite how rigorous these designs really are in terms of the technical specifications for insulation, ventilation and air tightness. For that reason, we suggest that those requirements are spelled out in an appendix to the planning document.</p>	<p>As above the SPD does not aim to articulate technical system detail of the delivery of renewable systems, rather embed the expectation that such systems should be fully considered for implementation in forthcoming proposals. In regard to technical guidance on requirements of such systems the SPD defers to the evolving building regulations framework.</p>	<p>Additional wording at 7.7 to draw reference to established and emerging building regulations standards in respect of embedded energy and energy efficiency in new residential construction</p>
RDG 8.4	Coventry Green Party	Paragraph 6.7	<p><u>Paragraph 6.7</u></p> <p>We welcome the statement in paragraph 6.7 that “the Council wishes to perpetuate and enhance ... (the) soft green character in its streets”. And that it encourages designers to “help maintain the ever-expanding green character of the city”. However, in our view, the current draft does sufficiently acknowledge the gravity of the situation we are facing as the climate continues to heat up. For that reason, we propose that, instead of the current wording which asks designers to “consider green infrastructure at the earliest stage in the design process” (see key principle “m” in Policy DE1) we would ask that this wording of this principle is more explicit in stressing the increasing importance of trees and other vegetation in cleaning and cooling the environment surrounding our homes.</p>	<p>The SPD cannot revise established wording within local plan policy DE1, however the role of landscape, planting and green infrastructure is nevertheless highlighted within the SPD.</p> <p>Officer accept that further strengthening of the importance of these elements and therefore propose additional wording included.</p>	<p>Additional wording at para 6.7 to recognise soft landscape role in cleaning and cooling the environment.</p>

New Residential Design Guide SPD Consultation Summary

RDG 8.5	Coventry Green Party	General	<p><u>General</u></p> <p>In broad terms, we welcome this new guidance for developers and designers on residential new build. It is innovative in its advocacy of passive solar design and positive in its reference to the green infrastructure. We hope that the Council will accept our comments intend to strengthen that guidance. As the members of the Coventry Green Party, we would welcome any opportunity to discuss further with the Council our ideas on this vital matter.</p>	Noted and welcomed	Actions as noted above.
RDG 9.1	Guide Dogs	Principle 4	<p><u>Principle 4: Street Design</u></p> <p>Guide Dogs welcomes the inclusion within the Design Guidance for New Residential Developments of Principle 4: Street Design, and that residential developments should:</p> <p>“Ensure streets are safe places by considering the needs of vulnerable users and providing active frontages, good lighting, clear, obstacle free routes for pedestrians and designing in traffic calming measures to restrict vehicle speeds.”</p>	Noted and welcomed	No action necessary

RDG 9.2	Guide Dogs	6.9	<p><u>Paragraph 6.9 &amp; 6.10</u></p> <p>However, the Supplementary Planning Document goes on to state:</p> <p>6.9 Shared spaces are streets and areas of public realm in which all uses have equal status. They involve the introduction of features which influence driver behaviour to reduce vehicle speeds and create places that encourage a high level of social interaction between residents. They work best in short residential streets such as mews, cul de sacs and rural lanes.</p>	Noted	No action required
RDG 9.3	Guide Dogs	6.10	<p>Shared streets are increasingly being promoted in Coventry. Although the Council welcomes this approach, it is important the design is carefully considered to ensure that the needs of all road users (including vulnerable groups such as children, elderly and disabled) are catered for.</p>	Noted	No action required
RDG 9.4	Guide Dogs	Shared Spaces	<p><u>Shared Spaces</u></p> <p>People with sight loss feel unsafe when forced to navigate wide open spaces and walk amongst moving vehicles.</p> <p>Guide Dogs recommends that a 60mm kerb be in place to separate footways and carriageways to help avoid collisions and assist people with a vision impairment navigate. Having the right balance between attractiveness and</p>	Officers note representation from user group which promotes inclusivity through the design of the built environment. Officer agree that such considerations of inclusivity should be included within the SPD and therefore include additional wording at principle 6 – Street Design.	Additional principle wording at 5 – Street design stating – street design should ensure inclusivity for all, notably careful considerations of gradients and demarcations to assist the visually impaired should be embedded into design proposals.

			<p>inclusiveness is crucial in determining if the overall objective is a success. These two things are not mutually exclusive, and both need to be considered.</p> <p>If a shared space is going to be included, with no kerb, then present corduroy tactile paving should be installed along the length of the carriageway on both sides. Corduroy hazard warning surfaces warn people of the presence of hazards e.g. steps and level crossings. Further, in line with the guidance on corduroy tactile paving, the paving should be 800mm deep to give enough warning of the hazard ahead. The paving should also be of one consistent colour, which should contrast against its surroundings.</p>		
RDG 9.5	Guide Dogs	Continuous Pavements	<p><u>Continuous Pavements</u></p> <p>These junctions are dangerous for people with sight loss, as people with a vision impairment may not be aware that they are entering onto a crossing area.</p> <p>Continuous footways should be avoided. However, where they are used, a tactile surface (with appropriate contrast) should be placed along the width of the crossing points where the traditional kerb has been removed. The tactile should be 800mm deep at all points and should not extend around the corner of the junction, as this would cause confusion to a</p>	Officers agree with the importance that street design should consider all user groups and their requirements, as such additional wording introduced in principle 5	Additional principle wording at 5 – Street design stating – street design should ensure inclusivity for all, notably careful considerations of gradients and demarcations to assist the visually impaired should be embedded into design proposals.

			visually impaired person and create a risk that they would cross at this point and not proceed directly across to the opposite side. Tactile paving should also be provided at the other side to indicate the end of the crossing. Additionally, there should be clear signage for pedestrians when approaching the junction that identifies the continuous footway across a side road to assist those with some residual vision.		
RDG 9.6	Guide Dogs	General	<p><u>General</u></p> <p>We have recently published comprehensive guidance to assist designers, architects, and local authorities in creating places that are both inclusive of people with sight loss, and ready to address the challenges towns and cities face in the future. The “Making the built environment inclusive” guidance can be viewed by clicking on the following link:</p> <p><a href="http://www.guidedogs.org.uk/inclusive-regeneration/">www.guidedogs.org.uk/inclusive-regeneration/</a></p>	Officers welcome reference to additional guidance in respect of this user group, however this reference does not impact upon the content of the SPD. As above further reference has been made within principle 5 for the consideration of all user groups, with specific reference to considerations for the visually impaired.	Additional principle wording at 5 – Street design stating – street design should ensure inclusivity for all, notably careful considerations of gradients and demarcations to assist the visually impaired should be embedded into design proposals.
RDG 10.1	Coventry Society	General	<p><u>General</u></p> <p>This consultation document is well-considered, contains some good ideas and makes a lot of sense. It is about Principles, and they need to be stated. However, while they have a use one must question whether they will really inspire good design. They set benchmarks, which may be helpful to planners working through</p>	<p>The SPD sits alongside design policy within the local plan and seeks to further articulate design expectations in the city and the process upon which ‘good design’ may be established.</p> <p>The SPD does not seek to define in a binary sense what may be</p>	<p>No revision necessary</p> <p>Table 2 is table one needs fixing</p> <p>Check where size definitions came from</p>

			<p>checklists to help form their judgements but may lead to applications which demonstrate compliance yet do little to help create a good sense of place. Overall, the document falls short in explaining what is good design.</p> <p>We can see that the guide is intended for developers and their architects/designers but we question its appeal to smaller developers and their clients who just want and need good practical illustrations and less text. Ideally, there should be a supplement, written by an architect or planner who is knowledgeable about the subject and the difficulties of raising standards.</p> <p>A key element of the document is the series of blue 'Principle' boxes. These are clear in concept and generally clear in definition.</p>	<p>considered 'good design' as such definitions are grounded in responsive outcomes to individual site situations. Rather the SPD establishes key points of consideration which designers will be expected to evidence in yielding design outputs and therefore positive promoting contextual responsiveness.</p>	<p>Architectural detailing already present as principle</p> <p>Public art as principle – noted</p> <p>Make note should be read in other documents such secure by design</p>
RDG 10.2	Coventry Society	Front Cover & Imagery	<p><u>Front Cover &amp; Imagery</u></p> <p>As with many documents now produced by the City Council it does have the feel of being produced by consultants - as exemplified by the awful, uninspiring 'anyplace' cover, references to 'the borough' and to 'villages'. Coventry photographs, where used, add to authenticity though some display poor access for disabled wheelchairs and children's pushchairs, some are poor quality, and a few include features which could be used against the Council on appeal. A review is needed of the relevance and appropriateness of all photographs.</p>	<p>References to massing precedents inclusive of town and village wording are accepted to be omitted to be specific in nature to Coventry.</p> <p>Officers note the use of imagery not from Coventry however also seek to illustrate good practice and innovative design solutions, accept use of caveat to imagery may be beneficial.</p>	<p>Deletion of wording at 7.9 and 8.4.</p> <p>Imagery role in the SPD clarified at 3.6</p>

RDG 10.3	Coventry Society	3.5	<p><u>Paragraph 3.5</u></p> <p>The document quickly confuses the reader with a reference in 3.5 to a Table 1. However, there is no such table which is supposed to be in Chapter 5. How significant is the omission?</p>	Officers note the need for revision to wording in respect of this point to ensure clarity for the reader.	Wording at 3.5 revised to ensure clarity.
RDG 10.4	Coventry Society	5.1	<p><u>Paragraph 5.1</u></p> <p>In that Chapter in 5.1 referring to the 'iterative design process' there is the expectation that 'Larger schemes (50+ net new units)' will be expected to follow the steps identified in Table 2. However, there is no justification as to why larger schemes are considered to be of that size or above.</p>	The threshold was established to read in parallel to the LPA's established pre application structure which defined development of 50-199 dwellings/units to constitute 'Medium Scale Major Development'. The SPD therefore establishes an expectation that development of this level and above should engage with the Pre-application system in order to promote best design outcomes.	- No action necessary
RDG 10.5	Coventry Society	Principle 1 & 2	<p><u>Principles 1 &amp; 2</u></p> <p>In the first two 'Principles' there is a reference to 'developments of 10 or more dwellings' without any justification of why this size of development has been chosen.</p>	It is the officer's assessment that the principles established in 1 and 2 in reference to concept plans are proportionate requirements for proposals, where opportunity of development of this quantum is able to establish a site-wide design approach which may be articulated with the supply of a concept plan. Similarly, this threshold also accords to the LPA's definition of small scale	- No action necessary

				major development articulated in the pre-application structure.	
RDG 10.6	Coventry Society	Principle 4 & 5	<p><u>Principle 4 &amp; 5</u></p> <p>In Principle 5 there is a reference to 'Developments of over 80 dwellings...' without any further justification. Without such justifications - and thus clarity - the document will be open to dispute by the developers that are required to follow its principles.</p> <p>Principles 4 and 5 are, confusingly, both titled 'Street Design'. P5 should be retitled 'Design of shared spaces'.</p>	<p>Officers agree clarity on principle in title wording re shared space and revise accordingly.</p> <p>80 Unit threshold previously to see correlation with council highways design guidance, however officers accept that with this guidance in place whilst other thresholds of development size within the SPD being 200+, a revision is accepted in order to accord principles within the SPD.</p>	<p>Principle 5 – Suffix in title of 'shared space'</p> <p>Principle 5 – threshold revision to 200</p>
RDG 10.7	Coventry Society	Section 7	<p><u>Section 7 &amp; the adoption of 2 new principles</u></p> <p>Section 7 'Built Form' in the last part 'Architectural detailing' there is the opportunity to add in two new Principles</p> <p>Making 7.24 a Principle (The Council will expect development to exhibit high quality architecture which reinforces the design vision for the scheme....)</p>	<p>Officers are content that the aspirations of suggested principle at 7.24 is similarly articulated within principle 21 in respect of architectural detailing whilst also drawing reference to DE1 in the local plan which further reinforces this principle.</p> <p>In respect of public art, this is articulated at 7.27 within the SPD, and is seen to address this</p>	No Action necessary

			A Principle relating to public art based on 7.27 (Public art will be encouraged to be incorporated into new developments particularly where they have significance to local communities and reflect the history and character of an area').	point sufficiently, given not all developments can be anticipated to be suitable for artwork integration, the application into an over-arching principle in the SPD is not seen as appropriate.	
RDG 10.8	Coventry Society	Secure by Design	<p><u>Secure by Design</u></p> <p>There ought to be a section that mentions 'secure by design' and references to parking courts should mention the importance of ensuring security.</p>	SBD is not a mandatory requirement however officer accept that early liaison in this respect is positive, therefore additional wording added to reinforce this.	<p>Reference to well lit and surveyed routes made in principle 3 - connectivity</p> <p>Principle 11 – parking courtyards – ‘secure by design standards should be fully considered’</p> <p>9.23 – boundary treatments – additional wording “secure by design standards should be referenced in design development and the authority recommend early liaison with SBD officers</p>
RDG 10.9	Coventry Society	Cross referencing to other council guidance	<p><u>Cross referencing to other council guidance</u></p> <p>There should be the opportunity to cross-reference to other city council guidance such as energy conservation, both for ventilation, heating and cooling.</p>	Reference to SPD being read in conjunction with other council guidance contained at 2.2 and 2.4	No action necessary

New Residential Design Guide SPD Consultation Summary

RDG 10.10	Coventry Society	Other	<p><u>Other</u></p> <p>We are concerned that whilst the Council can control the design of new dwellings, once constructed Permitted Development rights could allow unfortunate changes which undermine the quality of the development, e.g., with the construction of additional storeys.</p>	Discussion of restriction of permitted development rights of homeowners is significantly beyond the scope of this SPD and what may be included in content.	No action necessary
RDG 11	West Midlands Police	New Principle	<p><u>Proposed new Principle – Design out Crime</u></p> <p>To fully meet the requirements of national planning policy, the CCWMP formally requests that an additional core design ‘Principle’ is included within the SPD to highlight the need for residential development designs to fully address safety and security matters. This would include consideration of management plans, lighting, planting, reducing crime, anti-social behaviour and the fear of crime.</p> <p>The proposed wording for the new Principle is as follows:</p> <p><b>“Principle – Design out Crime:</b></p> <p>All designs will be required to meet Secured By Design standards and consider safety and security and the need to reduce anti-social behaviour and the fear of crime. Designs should seek to prevent crime and be developed in consultation with the Force</p>	The SPD cannot incorporate a requirement for secure by design standards, nor introduce third parties to a confidential Pre-application process. However, officers agree that reference should be made to secure by design consideration and promote that applicants should engage with these standards to inform design outputs, as such additional wording introduced into SPD accordingly.	<p>Reference to well lit and surveyed routes made in principle 3 - connectivity</p> <p>Principle 11 – parking courtyards – ‘secure by design standards should be fully considered’</p> <p>9.23 – boundary treatments – additional wording “secure by design standards should be referenced in design development and the authority recommend early liaison with SBD officers</p>

			<p>Design Out Crime &amp; Crime Reduction Officers at the pre-application stage.</p> <p>Any relevant counter terrorism standards applicable at the time should be taken into consideration.</p> <p>Details of Secured By Design compliance should be included in Design and Access Statements at the planning application stage. All design proposals should consider the legacy of the development and whether a maintenance plan would be appropriate, particularly in communal areas, to reduce the risk of crime in the short, medium and longer-term.”</p>		
RDG 12.1	Warwickshire Flood Risk Management	General	<p>During the design process FRM would encourage consideration of blue infrastructure as early on as possible. A mention of this during the concept planning stage could help ensure sufficient space and provision is made for sustainable water management in future developments.</p> <p>FRM have identified opportunities to incorporate Sustainable Drainage Systems (SuDS) that provide multiple benefits in addition to water management within confined spaces. SuDS could help deliver on many of the objectives discussed in the SPD such as amenity and green space.</p> <p>For instance: [The following comments follow on from this more general comment]</p>	Greater emphasis and referencing to SUDS systems now contained within document accordingly,	<p>Principle 4 – updated wording to include consideration of SUDS systems</p> <p>Principle 15 – Consideration of SUDS systems should always be considered</p>

New Residential Design Guide SPD Consultation Summary

RDG 12.2	Warwickshire Flood Risk Management	Section 6.7	<p><u>Section 6.7</u></p> <p>Section 6.7 discusses the ‘green character’ of Coventry’s street design and encourages the use of green infrastructure. FRM would like to highlight this opportunity to also mention sustainable drainage systems such as tree pits, rain gardens and swales; all of which would contribute to the amenity value and green street scene, but also provide sustainable highway drainage that helps manage flood risk.</p>	Officers agree the referencing of SUDS systems alongside principles of street design should be considered, wording revision therefore added.	Additional principle in4- street design included to reference SUDS in street design
RDG 12.3	Warwickshire Flood Risk Management	6.12	<p><u>Section 6.12</u></p> <p>There are also opportunities to consider blue/green infrastructure and micro SuDS when discussing appropriate design and density in section 6.12.</p>	Officers note this point, however content of the SPD at 6.12 discusses density in respect of prevailing urban grain and contextual responsiveness, as such do not believe it appropriate to include reference to SUDS systems at this point.	No action necessary
RDG 12.4	Warwickshire Flood Risk Management	8.17-8.22	<p><u>Sections 8.17 – 8.22</u></p> <p>Sections 8.17-8.22 discuss the importance of amenity space whilst facing the challenges of confined urban spaces. Opportunities for dual purpose facilities could be mentioned here. With imaginative design, SuDS can provide both high quality green amenity spaces for most of the year but also provide vital flood protection during heavy rainfall events.</p>	Whilst noting the visual amenity value of SUDS systems, officers advise that referencing in this location of the SPD may confuse the reader in respect of the aims of delivery of useable outdoor amenity spaces and therefore advise against wording changes in this regard.	No action necessary

RDG 12.5	Warwickshire Flood Risk Management	9.20	<p><u>Section 9.20</u></p> <p>FRM supports Coventry City Council’s stance on minimising the adverse impacts of hardstanding, including flooding, in section 9.20.</p>	Noted and welcomed	No action necessary
RDG 12.6	Warwickshire Flood Risk Management	6.33	<p><u>Section 6.33</u></p> <p>FRM supports the conservation and enhancement of waterways as eluded to in section 6.33. This section of the SPD could be expanded upon to reference the Coventry Local Plan policy EM4 where river restoration and de-culverting is encouraged.</p>	Officers agree that reference to local plan policy here may aid the reader and as such revise wording to provide link.	6.33 - “due consideration of relevant local plan policies should be embedded in design proposals”
RDG 13.1	Savills (On behalf of unnamed housebuilder client)	General	<p><u>General</u></p> <p>Overall, it is considered that in certain parts of the SPD the proposed requirements are quite onerous and we consider that the overall wording of the guidance should be more flexible to allow for the design of residential schemes to be considered and agreed on a site by site basis. Words such as ‘where possible’ and ‘encouraged’ should be utilised throughout the SPD unless there is sufficient justification as to why the specific requirement is necessary. This will ensure that the SPD is “flexible enough to accommodate needs not anticipated in the plan” (NPPF paragraph 82) and ensure that developments are making the best use of land.</p>	The SPD articulates design expectations in the city in order to promote high quality outcomes, however the SPD does not introduce additional mandatory requirements, in this context current wording is seen to be appropriate.	Revisions as follows per point below :

New Residential Design Guide SPD Consultation Summary

RDG 13.2	Savills (On behalf of unnamed housebuilder client)	Principle 1	<p><u>Principle 1</u></p> <p>Principle 1 does not differentiate between outline, full or reserved matters applications; however, paragraph 5.6 states that the concept plan should include an ‘indicative layout’. We would only normally expect an outline planning application to be supported by a Concept Plan as plans are indicative at this stage. However, full or reserved matters applications should include more detailed plans.</p> <p>It is currently unclear what purpose a Concept Plan would serve for a full or reserved matters application. We consider that Principle 1 should be reworded to state that “Outline applications for 10 or more dwellings should also provide a concept plan in the Design &amp; Access Statement”. For outline applications, Concept Plans should then only be illustrative to demonstrate how the illustrative masterplans could potentially be delivered.</p>	<p>Whilst concept plans often articulate proposals at outline submission stage, these concepts also aid later design development stages by illustrating the design process from conception to the later detailed layout stages. As such principle one sets the expectation for concept plans to be submitted across application types, in order that proposals at any stage are supported by a cohesive design narrative.</p>	No Action necessary
RDG 13.3	Savills (On behalf of unnamed housebuilder client)	Principle 2	<p><u>Principle 2</u></p> <p>‘Plot Plans’ are not a readily understood requirement. Little detail or guidance is included within the SPD on what plot plans entail and how they differ from a Layout Plan. Further clarity is sought on this requirement.</p>	Accepted and re-wording enacted for clarity of requirement	<p>Principle 2 rewording of ‘plot plans’ to ‘layout plans which identify dwelling plots</p> <p>Title and 5.8 rewording, ‘plot layouts plans’</p> <p>Table 2 update – ‘plot layout plans’</p>

<p>RDG 13.4</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Para 6.5 and Principle 4</p>	<p><u>Paragraph 6.5 &amp; Principle 4: Cul-de-sacs</u></p> <p>We consider that the wording of this paragraph and its principle are not positively prepared in accordance with the requirements of the NPPF (paragraph 16).</p> <p>Cul de sac as part of proposed layouts can help to define character areas, create safer streets through removing ‘through-traffic’ and are often sought after by house purchasers. The provision of some culs de sac as part of a development does not necessarily mean it is not well-connected.</p> <p>Regard should also be given to the support in ‘Secured by Design Homes’ (V2 March 2019) to the safe environments that culs-de-sac can create and to avoid permeability between culs-de-sac. We also request clarification on whether single roads that lead to private drives would also fall within this category?</p> <p>From a design perspective, culs-de-sac should be considered acceptable providing that the distances to main roads/loops are maintained for emergency/fire service vehicles.</p> <p>We consider that paragraph 6.5 should be reworded to state that:</p> <p>“cul de sac layouts will be supported where the wider scheme can demonstrate connectivity to</p>	<p>Para 80 of the national design code state that <i>“Mews, courtyards and cul-de-sac will generally only be appropriate at the most local level where there is little vehicular movement.”</i> And whilst the authority do not rule out the use of cul-de-sac arrangement, the need for connectivity and thus promoting their restrained use has informed the SPD.</p> <p>Officers note the suggestion for re-wording at 6.5 to reinforce the role and importance of connectivity in cul-de-sac arrangements, however the text of the SPD reaches similar conclusion in this regard.</p> <p>In respect of principle 4 – officers retain the position that excessive use of cul-de-sac arrangements may yield lower quality design outcomes and therefore retain wording in the interests of delivery of positive street hierarchy.</p>	<p>No action necessary</p>
-----------------	---	---------------------------------	---	---	----------------------------

New Residential Design Guide SPD Consultation Summary

			<p>surrounding areas via open space or footpath/cycle links”.</p> <p>We consider that the last sentence of Principle 4, bullet 2 should be deleted as it is not positively prepared in accordance with the NPPF (paragraph 16).</p>		
RDG 13.5	Savills (On behalf of unnamed housebuilder client)	Principle 5 & Paragraph 6.9: Shared Spaces	<p><u>Principle 5 &amp; Paragraph 6.9: Shared Spaces</u></p> <p>We consider that the delivery of shared spaces should be determined on a site by site basis and key considerations such as site context should be taken into consideration. This principle should be reworded to ‘encourage’ the provision of shared spaces.</p>	<p>The SPD does not set a mandatory principle in this regard, and the LPA accepts that assessment will be made on a site-specific basis on such proposals. The SPD wording currently promotes shared space use by stating ‘developments <i>should</i> contain a mixture of shared space’ and as such the suggested re-wording is not seen to alter outcomes.</p>	No action necessary
RDG 13.6	Savills (On behalf of unnamed housebuilder client)	Principle 6	<p><u>Principle 6</u></p> <p>We assume that by referring to high ‘intensity’ the Council is referring to high density areas, although this should be clarified in the SPD.</p> <p>The SPD does not define what the Council considers is ‘generous’. The adopted Local Plan already requires development to provide a percentage of land which is undeveloped dependant on its size and location (supporting text of Policy H9).</p>	<p>Clarification upon open space requirements provided by revision to allow cross reference to open space SPD.</p>	Bullet point 3 principle 6 – reference to open space SPD

			Therefore, we consider that the undeveloped land requirement and public open space provision (in accordance with adopted standards) should be the only green infrastructure required.		
RDG 13.7	Savills (On behalf of unnamed housebuilder client)	Principle 7	<p><u>Principle 7</u></p> <p>We consider that the SPD should provide more clarity on what the Council considers is a ‘large’ development and if this requirement remains then “where possible” and “where appropriate” should be added to the end of the sentence as a mix of uses may not be suitable or required for every site.</p>	<p>Officers accept role of greater clarity at points 5.1 and 5.2</p> <p>The introduction of an expectation of a mix of uses is seen to promote the creation of new communities in larger schemes, whilst the SPD does not introduce a mandatory requirement, rather an expectation in the aims of positive place making by the incorporation of uses complimentary to a new residential setting.</p>	<p>Rewording of 5.1 to aid clarity now stating expectation of schemes of 50 units and over, which accords to the pre-applications process definition of ‘medium scale, major development’.</p> <p>5.2 rewording to recommend the Pre-application process for schemes of more than 10 units</p>
RDG 13.8	Savills (On behalf of unnamed housebuilder client)	Paragraph 6.21, Principle 32, Principle 9, Principle 10 & Principle 12: Car Parking	<p><u>Paragraph 6.21, Principle 32, Principle 9, Principle 10 &amp; Principle 12: Car Parking</u></p> <p>Paragraph 6.21 states that porous surfacing should be used for parking areas. Principle 32 also requires new hardstanding areas to be constructed from porous materials. We consider that this sentence should be reworded to ‘encourage’ the use of porous surfacing in accordance with the wider sustainable surface water drainage strategy which is required by</p>	<p>The SPD does not set out new requirements in this respect, however, seeks to promote an expectation of the use of porous materials to aid the management of surface water where new areas of hardstanding are proposed</p>	<p>No Action necessary</p>

New Residential Design Guide SPD Consultation Summary

			the NPPF (paragraph 167) and the Local Plan (Policy EM5).		
RDG 13.9	Savills (On behalf of unnamed housebuilder client)	Principle 9	Bullet 1 of Principle 9 states that no design should group more than 3 parking spaces without intervening landscaping (on-plot and on-street). It is unclear whether this is referring to three linear spaces on a streetscene or if side parking for two dwellings resulting in four spaces would also be unacceptable? If landscaping were proposed, once the dwelling is sold, there is no guarantee that it will be retained by the purchaser. We consider parking should be agreed on a site by site basis and this requirement should be removed.	Officers accept additional need for clarity in respect of parking space grouping in principle 9 and wording amended accordingly. Design outcome sought to prevent excessive linear run of parking spaces without relief to manage potential of car dominance in street scene.	Principle 9 'no more than 3 linear parking spaces together'
RDG 13.10	Savills (On behalf of unnamed housebuilder client)		Principle 10 states that on-plot parking should generally be to the side or rear of properties to reduce visual impact. We do not support this onerous requirement. Our experience is that rear parking can raise concerns in relation to safety / visibility / accessibility. As a general rule, Secured by Design Homes (March 2019) discourages use of rear parking courts. Parking locations should be determined on a site by site basis.	Principle 10 does not mandate parking arrangements in any specific form, however, seeks to promote arrangements which may mitigate the risks of car dominated street scenes y excessive use of frontage parking arrangement, therefore promoting accommodation of vehicles to the side or rear.  Re-wording accepted to clarify at principle 10.	Principle 10 – On plot parking “on plot parking should not be dominated by excessive frontage parking arrangements”

<p>RDG 13.11</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p>Principle 12 states that where parking bays are provided on-street, they should be in clusters of no more than 3 spaces. It is unclear what the justification for this requirement is and we consider it should be removed.</p>	<p>As noted above, the SPD seeks to promote design approaches which mitigate the potential for excessive car dominance in the streetscene in order to create the most positive new residential environments.</p> <p>Officers accept rewording to this point to aid clarity of expectation</p>	<p>Principle 12 – “where bays are provided, they should not generally not exceed a cluster of 3 spaces without landscape relief,</p>
<p>RDG 13.12</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p><u>Principle 15</u></p> <p>We consider that the layout should be determined on a site by site basis. Therefore, this requirement should be reworded to state that “the Council will <u>encourage</u> new residential developments to make optimal use of natural light and warmth so as to minimise the use of energy for lighting and heating, <u>where possible</u>”.</p>	<p>Officers accept that site context and constraints may impact upon the deliverability of these positive principles. Therefore, the principle is proposed to retain with minor rewording or ‘where possible’.</p>	<p>Principle 15, bullet point one – where possible.</p>
<p>RDG 13.13</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p><u>Paragraph 7.5</u></p> <p>We consider that building heights should be determined on a site by site basis allowing for consideration of existing streetscape and the scale of existing development.</p>	<p>Understood to be in reference to para 7.9 – the SPD referencing site specific design informative, notably at Principle 17.</p>	<p>No action necessary</p>

New Residential Design Guide SPD Consultation Summary

<p>RDG 13.14</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 19</p>	<p><u>Principle 19: NDSS</u></p> <p>There is no requirement in the adopted Local Plan for developments to comply with NDSS. Footnote 49 of the NPPF states that “policies may also make use of the nationally described space standard, where the need for an internal space standard can be <u>justified</u>” [Savills emphasis].</p> <p>The PPG adds further guidance which states that in order to justify a need for internal space policies, Councils should take account of evidence of need, the impact of development viability and timing of the transitional period for the adoption of space standards (Reference ID: 56-020-20150327).</p> <p>No demonstration of need or viability evidence has been prepared to support the SPD. The introduction of a NDSS policy should be tested and justified through the Local Plan process. This SPD cannot introduce a requirement for dwellings to meet NDSS and therefore Principle 19 should therefore be deleted</p>	<p>The SPD does not introduce a mandatory requirement to meet NDSS standards, however, sets an expectation that new development should meet these standards in delivery of quality residential development in the city, similarly this expectation aligns to those set for delivery of affordable housing in the city which states</p> <p><i>The City Council will actively seek the delivery of affordable housing that meets high of living standards. As such, the Council promotes the use, and reference of, the Nationally Described Space Standards as an initial framework in achieving affordable homes with satisfactory internal living space.</i></p> <p>The setting of this expectation establishes a transition period ahead of any local plan revision in this regard. Tests of viability therefore remain applicable.</p>	<p>-</p>
----------------------	---	---------------------	---	---	----------

RDG 13.15	Savills (On behalf of unnamed housebuilder client)	Principle 20	<p><u>Principle 20: Adaptable Homes</u></p> <p>We request that ‘where possible’ should be added to Principle 20 seeking for buildings to be adapted to meet future needs</p>	<p>In the context of Principle 20 not introducing a new mandatory requirement, this suggested revision is not seen to be necessary. The principle seeks to promote to incorporation of designing in adaptability into new housing developments.</p>	No action necessary
RDG 13.16	Savills (On behalf of unnamed housebuilder client)	Paragraphs 7.23, 7.24 & Figure 19	<p><u>Paragraphs 7.23, 7.24 &amp; Figure 19</u></p> <p>Paragraphs 7.23 and 7.24, as well as Figure 19 of the SPD are not considered to be typical architectural details for the majority of existing housing found in Coventry. We consider that the design of schemes should comply with national design guidance and should most importantly be determined on a site by site basis, informed by the site context or the agreed vision between the Council and applicant for the site.</p>	<p>Elements of architectural interest which may add to the visual richness of schemes are shown. Whilst these are not in any way prescriptive and architectural design should be contextually responsive and assessed in this regard, the SPD seeks to promote architectural innovation in the city across a wide variety of contexts, as such the statements seek to promote innovation and consideration of a wide range of architectural treatments.</p>	No action necessary
RDG 13.17	Savills (On behalf of unnamed housebuilder client)	Paragraph 8.4	<p><u>Paragraph 8.4</u></p> <p>We consider that separation distances should be determined on a site by site basis and the SPD should clearly state that these should be achieved ‘where possible’ and in the context of the site, as opposed to a blanket requirement across the whole city.</p>	<p>Guidance upon separation distances is given within the SPD, whilst accepting that some consideration of context will be given in this regard – wording changes are not therefore seen as necessary.</p>	No action needed

New Residential Design Guide SPD Consultation Summary

<p>RDG 13.18</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Table 3</p>	<p><u>Table 3: Outdoor Space Standards</u></p> <p>These requirements should be used as a guideline for development and applied flexibly. The final areas should be agreed on a site by site basis. We consider that ‘where possible’ should be added to the wording to provide this flexibility.</p> <p>The above separation distances and outdoor space standards proposed within the SPD are not supported by evidence which considers the impact of the proposed separation distances on site coverage and density that can be achieved and on development viability</p>	<p>The SPD accepts at 8.20 that sizes may also vary on the context of the property.</p>	<p>Table 3 revised titled ‘guidance’ accepting point of 8.20 site specific contexts</p>
<p>RDG 13.19</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 26-29</p>	<p><u>Principle 26-29</u></p> <p>On a more minor note, Principles 26 – 29 should all have different names to avoid confusion on what they each relate to.</p>	<p>Each principle is stated below the relevant topic area, however to aid clarity for the reader officers accept additional wording to the titles may be useful – as such revised wording proposed</p>	<p>Principle 26 – Private Garden Space</p> <p>Principle 27 – External Communal Space</p> <p>Principle 28 – Outdoor Amenity – Apartment Schemes</p> <p>Principle 29 – Outdoor Amenity – Residential Care Homes</p>

<p>RDG 13.20</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 24, 25 &amp; Paragraph 8.10</p>	<p><u>Principle 24, 25 &amp; Paragraph 8.10: Internal Lighting of Habitable rooms</u></p> <p>Principles 24 and 25 as well as paragraph 8.10 contain very specific requirements for internal lighting in habitable rooms. We consider that more flexible wording should be adopted as these requirements should be determined on a site by site basis. Therefore ‘where possible’ should be added to these sections of the SPD</p>	<p>Principle 24, 25 &amp; Paragraph 8.10 do not seek to introduce new mandatory requirements. Instead they seek to provide guidance on best practice.</p>	<p>No action necessary</p>
<p>RDG 13.21</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 30</p>	<p><u>Principle 30: Front boundary treatments</u></p> <p>We do not support Principle 30 and the proposal that front garden boundary treatments in excess of 1.2m will be discouraged. This statement is not positively worded (NPPF paragraph 16) and front gardens can help create a street scheme. Boundary treatments can be framed by hedgerows and railings as well as walls and fences. We therefore consider that it should be deleted.</p>	<p>Boundary treatments to front gardens are promoted in the SPD however those in excess of 1.2m are discouraged in respect of the creation of overly defensive environments.</p> <p>The policy does not mandate this principle, however, dissuades such approaches, and in this context officers do not believe this requires deletion.</p>	<p>No action necessary</p>
<p>RDG 13.22</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p><u>Paragraph 9.12: Bin Storage</u></p> <p>There may be some instances where the distance is greater than 25m and is justified. We consider that this sentence should be amended to state that “where possible, the distance between the collection point and storage points should be less than 25m”.</p>	<p>Paragraph 9.12 does not seek to introduce a mandatory requirement; it instead seeks to guide new residential development to avoid providing bin storage further 25m away from collection points. Given that 9.12 does not introduce a mandatory requirement and rather promotes early</p>	<p>No action necessary</p>

				engagement with the LPA, stating a base expectation, the statement is implicit in its acceptance of assessment of individual sites.	
RDG 14.1	Claremont on behalf of Persimmon Homes (Central)	Glossary	<p><u>Glossary</u></p> <p>Section 1 of the SPD presents a glossary to define key terms to be used throughout the SPD which is supported.</p> <p>However, the glossary as currently proposed includes some definitions which are inappropriate or unjustified, and not in accordance with existing policy, legislation and/or guidance:</p> <p><b>Daylight</b> The definition for 'daylight' as proposed within the SPD is considered ambiguous in its current form. The use of the term 'volume' to describe levels of natural light received by dwellings alludes to the imposition of technical or numerical standards with respect to daylight which is not supported.</p> <p>In addition, the current definition refers to the illumination of internal accommodation, which infers that daylight standards will be applied to</p>	<p>Access to positive levels of daylight is seen as crucial in delivering quality accommodation in the city. The contents of the glossary however simply seek to articulate terms to aid understanding to the reader rather than extend beyond into applications. Clarifications of the expectations of design approach to the subject of daylight is outlined in section 8.8, 8.9, 8.10 and within Principle 24 and 25. It is accepted however that 'volume' within the definition could be interpreted as overly technical and as such minor wording revision enacted.</p> <p>Similarly in respect of Density the glossary does not seek to articulate application of terms, rather a brief explanation of them to aid the reader. Considerations of density are then primarily</p>	<p>'Daylight' Accepted 'volume' deletion in daylight definition replaced with 'the level of'</p> <p>'Density' No action necessary</p> <p>'Habitable Rooms and areas' Omission of initial wording to aid clarity, and removal of outlook from kitchen areas whilst retaining 'a positive level of natural light'.</p>

			<p>all internal accommodation rather than habitable and non-habitable rooms.</p> <p>This approach is not supported and it is recommended that the proposed definition is revised such that it accords with recent government guidance and legislation.</p> <p><u>Density</u></p> <p>In addition, it is not considered that the definition of 'density' as presented within the draft SPD is acceptable in its current form. Whilst the current definition acknowledges that density relates to more than just the number of residential units per hectare, no further clarification of how else density is considered by the Council is provided. Further clarification of this is therefore necessary, particularly in respect of how the Council assesses density in respect of mixed use developments.</p> <p><u>Habitable Rooms &amp; Areas</u></p> <p>The definition of 'habitable rooms and areas' presented within the glossary is also not supported in its present form. It is not considered that this definition accords with the accepted terminology used throughout national policy and guidance.</p> <p>Crucially, references to sitting, lying down, and quiet environments to concentrate or rest</p>	<p>contained in the SPD at 6.11, 6.12 and Principle 6, whilst also making reference to higher and lower density character areas in seeking contextually responsive design solutions.</p> <p>In respect of habitable rooms and areas, the explanation provided in the glossary is not seen to be at odds with other accepted definitions, however, accept that wording may introduce some ambiguity to the reader. Therefore, initial wording removed whilst 'outlook' removed from cooking space but retaining positive level of natural light</p>	
--	--	--	--	--	--

New Residential Design Guide SPD Consultation Summary

			<p>should therefore be removed as these are misleading and not relevant considerations.</p> <p>Moreover, the current definition seeks to apply requirements for natural light and outlook to kitchens which are used solely for food preparation only. It is requested that this reference is removed as requiring outlook and natural light for non-habitable rooms conflicts with national policy and guidance</p>		
RDG 14.2	Claremont on behalf of Persimmon Homes (Central)	<u>Design Process Expectations in Coventry: Pre-App</u>	<p><u>Design Process Expectations in Coventry: Pre-App</u></p> <p>This approach is not supported, and instead this text should be revised to identify pre-application engagement on all larger schemes as an aspiration rather than a requirement.</p> <p>Identifying pre-application engagement as an aspiration comprises an approach which complements the provisions of Paragraph 40 of the National Planning Policy Framework (NPPF) which advises that whilst LPA’s have a key role in encouraging other parties to take maximum advantage of the preapplication stage, they cannot require that a developer engages with them prior to the submission of a planning application.</p>	Officers accept re wording of requirement at 5.2	5.2 – Wording revised to encourage schemes of 10 units or more to engage with the pre-application process

RDG 14.3	Claremont on behalf of Persimmon Homes (Central)	Design Process Expectations: Vision Setting	<p><u>Design Process Expectations: Vision Setting</u></p> <p>Whilst the imperative for developments to be led by a coherent design vision is appreciated, it is not considered appropriate to place substantial emphasis on agreeing strict design visions for development at the pre-application stage.</p> <p>Indeed, the Council’s website expressly identifies that pre-application advice does not constitute a formal response from the Council. Instead, it is advised that this text is revised to identify the Council’s aspiration for design visions guiding development to be established at the earliest opportunity.</p>	This SPD does not seek to introduce new mandatory requirements, it seeks to advocate and encourage developers/agents to engage with the council on matters of design in the council’s preferred manner.	No action necessary
RDG 14.4	Claremont on behalf of Persimmon Homes (Central)	Principle 2	<p><u>Principle 2: Concept Plan</u></p> <p>It is requested that an alternative name for Principle 2 is identified, such as ‘Plot Plans’, in order to clearly distinguish between the requirements of this Principle and Principle 1 which also refers to concept plans. In addition, it should also be clarified that the submission of plot plans should only be required at detailed design application stage, as this information will not be available, or indeed necessary to define, at outline stage</p>	Principle 2 to be renamed “Plot Layout plans” and this is shown in table 2 as only necessary in detailed design stage	<p>Amended Principle 2 title ‘plot layout plan’</p> <p>Note re Table 2 – ‘design process’ revised to state exceptions in outline application expectations.</p>

New Residential Design Guide SPD Consultation Summary

RDG 14.5	Claremont on behalf of Persimmon Homes (Central)	Principle 3	<p><u>Principle 3</u></p> <p>In respect of connectivity, Principle 3 expects developments to connect into and complement the existing local network of routes and public open spaces and which prioritise modes of active transport. This is supported.</p> <p>However, Principle 3 also expects developments to look for opportunities to create connections into/through neighbouring land such to facilitate a well connected network in the event of future land release and development. This requirement requires further clarification from the Council, and it is advised that this should instead be identified as an aspiration to be applied only where justified and feasible. Appropriate circumstances in which this aspiration could be applied include where adjacent land is allocated for development, subject to an extant consent or the subject of an application for development.</p>	Principle 3 seeks to encourage developers to explore opportunities to create better connections, it does not seek to introduce new mandatory requirements.	No action necessary
RDG 14.6	Claremont on behalf of Persimmon Homes (Central)	Principle 4	<p><u>Principle 4</u></p> <p>Principle 4 however continues on to advise that street design should facilitate social interaction through incorporating pause points, small amenity spaces, seating and squares. It is not considered that incorporating these features into street design is necessary, where it is considered that sufficient opportunities for</p>	Principle 4 is not seeking to introduce new mandatory requirements. It seeks to illuminate the council’s vision for new residential developments through outlining expectations not requirements.	No action necessary

			social interaction would be provided for through any public open space provision on site.		
RDG 14.7	Claremont on behalf of Persimmon Homes (Central)	Principle 5	<p><u>Principle 5: Shared Spaces</u></p> <p>Although the provision of shared spaces is supported, it is considered that the identified threshold of 80 units is not appropriate where it may be challenging to incorporate a variety of shared spaces and traditional vehicular streets in schemes of this size.</p> <p>Instead, it is advised that a pragmatic approach to the delivery of shared spaces would be to remove the 80 dwellings or more threshold and instead advocate for their incorporation into scheme design where feasible and deliverable</p>	We acknowledge that this is not universally applicable and that there may be especially constrained sites that cannot accommodate this, as such the threshold has been revised to align to the council's definition of Large Scale development of 200+ units.	Revision in principle 5 to 200+ unit threshold to accord to council definition of Large Scale Development
RDG 14.8	Claremont on behalf of Persimmon Homes (Central)	Principle 6	<p><u>Principle 6: Density of new development</u></p> <p>This approach is supported and considered compliant with Paragraph 119 of the NPPF.</p> <p>Of concern however is the expectation within Principle 6 that residential developments in higher intensity locations will be supported by generous green infrastructure provision and the appropriate level of amenity space provision.</p> <p>It is considered that this expectation fails to recognise that higher density developments are frequently located within the established urban</p>	The appropriate levels of open amenity space is laid out in the Open Spaces SPD and as per a previous comment we will highlight that in this section. We disagree that the provision of high density residential development precludes the provision of green and open space and will expect applicants to be mindful of the provision of such space for the benefit of future occupiers.	Link to Open Space SPD now included in SPD within principle 6

			<p>area and on brownfield sites which are therefore constrained by site area, proximity to adjacent development and site conditions.</p> <p>It is advised that the Council revise Principle 6 in order to recognise the constraints to developments in higher intensity locations, and instead promote the adoption of creative strategies to deliver green infrastructure and amenity space provision where appropriate.</p> <p>This ensures that the delivery of higher density urban schemes and brownfield regeneration throughout the City is not compromised by overly restrictive standards.</p>		
RDG 14.9	Claremont on behalf of Persimmon Homes (Central)	Principle 7	<p><u>Principle 7</u></p> <p>Although Principle 7 is also referred to as ‘Density’ within the draft document, it is recommended that this be revised to refer to ‘Mix of Uses’ as this more closely reflects the content of the Principle. Accordingly, Principle 7 seeks to ensure that all residential development contributes to balanced communities through delivering a mix of residential densities and a varied housing mix. Whilst this is supported, this Principle would benefit from some further clarification to identify that a mix of residential densities will be supported in accordance with local</p>	<p>Title an error and will be amended to “Mix of Uses”</p> <p>The SHMA is already referenced in the preliminary text, and references to Local Plan policies within every Principle would render the document less usable.</p> <p>As an urban authority the expectation for large residential sites to have a mix of uses is appropriate. In the unlikely event of this not being appropriate this will be dealt with on a case-by-case basis.</p>	Amended Principle title to “Mix of uses”

			<p>character to ensure the SPD’s compliance with Policy H9 of the Local Plan.</p> <p>Furthermore, it would also be beneficial for this Principle to direct developers to the Council’s latest SHMA when considering housing mix and to recognise that there are circumstances where delivering a SHMA compliant housing mix, as confirmed through Local Plan Policy H4.</p> <p>Principle 7 also asserts that ‘larger residential development sites’ will be expected to deliver a mix of uses. This expectation is not considered appropriate, where it fails to recognise that delivering a mix of uses within developments is not always feasible or appropriate. This is confirmed within Paragraph 113 of the National Design Guide which similarly advises that mixed-use schemes are typically appropriate in urban locations and the centre of larger scale developments</p> <p>Requiring a mix of uses on all larger schemes will necessitate a reduction in the capacity of these sites and their resultant contribution to the City’s housing land supply which is contrary to the NPPF and its aspiration to secure an effective use of sustainably located sites.</p>	-	
--	--	--	---	---	--

New Residential Design Guide SPD Consultation Summary

<p>RDG 14.10</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 9 and Paragraph 6.23</p>	<p><u>Principle 9 &amp; Paragraph 6.23: Parking Layouts &amp; Inclusive Access</u></p> <p>The inclusion of this expectation demonstrably conflicts with the flexible approach to parking provision identified in the supporting text which expressly identifies at Paragraph 6.23 that the Council accepts that developments may require a mix of parking solutions. The current requirement does not provide for this where compliance with this requirement cannot be achieved for terraced house types whilst also necessitating a uniform approach to parking provision which is not considered to represent good design.</p> <p>Principle 9 also continues on to advise that no design should group more than three car parking spaces together without intervening landscaping. This requirement is overly prescriptive and should be revised to require developments to make use of green infrastructure where possible in order to ensure that parking does not dominate the development or street scene, in accordance with Paragraph 86 of the National Design Guide</p>	<p>Principle 9 merely outlines the councils desires with regards to Parking in new residential developments, it does not introduce new mandatory requirements.</p>	<p>No action necessary</p>
------------------	---	---------------------------------------	--	--	----------------------------

<p>RDG 14.11</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 10, 11 &amp; 12</p>	<p><u>Principle 10,11 &amp; 12</u></p> <p>The Council’s approaches to on-plot parking and parking courts as set out within Principles 10 and 11 respectively are considered to be pragmatic and are therefore supported.</p> <p>The Council’s approach to on-street car parking established within Principle 12 however requires further clarification where this Principle identifies that where parking bays are provided these should accommodate a cluster of no more than three cars. This approach is overly prescriptive and fails to acknowledge that some site layouts could sensitively accommodate clusters of more than three bays without having a dominating impact on the street scene.</p> <p>The general guidance contained within the Principle is considered to be sufficient to ensure that on-street car parking is sensitively integrated without the introduction of numerical standards.</p>	<p>Principle 3 does not introduce new mandatory requirements. It outlines the councils expectations for off-street parking, however clarity of wording revision enacted at principle 12.</p>	<p>Wording revision in principle 12.</p>
<p>RDG 14.12</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 13</p>	<p><u>Principle 13: Boundary Treatments</u></p> <p>Boundary treatments are considered at Principle 13 of the draft SPD. Whilst the National Design Guide promotes developments which clearly distinguish between public and private spaces, this can be achieved through the use of soft landscaping and low level</p>	<p>Principle 13 does not seek to establish a mandatory minimum height for boundary treatments, it seeks to promote a minimum height for boundary treatments to be adhered to ‘where appropriate’.</p>	<p>No action necessary</p>

New Residential Design Guide SPD Consultation Summary

			boundary treatments. As such, it is not considered necessary or justified for Principle 13 to establish a 1m minimum height for boundary treatments in residential environments.		
RDG 14.13	Claremont on behalf of Persimmon Homes (Central)	Built Form General Comment	<u>Built Form General Comment</u>  Persimmon Homes (Central) are predominately supportive of the Council’s guidance in respect of built form as set out within Principles 14 – 22.	Noted.	No action necessary
RDG 14.14	Claremont on behalf of Persimmon Homes (Central)	Principle 15	<u>Principle 15</u>  In respect of Principle 15: Sustainable Design however it is considered that the requirement for developments to incorporate passive solar design is poorly substantiated. Instead, this should be identified as an aspiration for developments where feasible alongside the implementation of other passive design strategies, as promoted by Paragraph 150 of the National Design Guide.	We feel the need for improved passive solar design is widely established and should be welcomed by developers in order to provide sustainable development. Building Regs Part O and M already have such similar expectations regarding minimising solar gain.	No action necessary
RDG 14.15	Claremont on behalf of Persimmon Homes (Central)	Principle 19	<u>Principle 19: NDSS</u>  Principle 19 of the SPD expects new housing development to comply with the national internal space standards. Whilst this is supported, the Council should recognise that compliance with these standards may not always be feasible or deliverable. Indeed, there	Support noted and welcomed. The principle states an expectation and not a requirement to meet such standards.	No action required

			is no Local Plan policy which requires that schemes comply with these standards, and footnote 49 of the NPPF advises only that LPA policies can make use of the nationally described space standards, only where the need for an internal space standard can be justified.		
RDG 14.16	Claremont on behalf of Persimmon Homes (Central)	Principle 21	<p><u>Principle 21: Architectural Detailing</u></p> <p>The use of architectural detailing which creates attractive buildings is established by Principle 21 of the draft SPD and is supported. However, this Principle requires further clarification where it identifies that buildings which employ architectural detailing that is not honest will be resisted.</p> <p>The use of the phrase ‘honest’ is both ambiguous and subjective. It is advised that this clause could alternatively be phrased to refer to concepts such as pastiche designs in order to provide clarity in the application of this Principle</p>	The definition of honesty in this context is discussed in the preceding paragraph 7.26. However, insertion of a link to this paragraph within principle box is accepted could aid clarity for the reader.	Amend principle to include call back to para 7.26
RDG 14.17	Claremont on behalf of Persimmon Homes (Central)	Principle 22	<p><u>Principle 22: Architectural Design</u></p> <p>The provisions of Principle 22: Architectural Design are supported, however it is suggested that this Principle could be improved through the introduction of amended wording to support the role of windows in establishing active frontages.</p>	<p>The wording of principle 22 establishes the positive role of fenestration in architectural design, from which active frontage may be delivered.</p> <p>The role of active frontages is elsewhere articulated within</p>	No action required

New Residential Design Guide SPD Consultation Summary

			Further clarification of this principle could also be achieved through the further introduction of wording to identify that the design and detailing of fenestration should seek to positively respond to and enhance local character. This would further ensure that the SPD supports the provisions of the National Design Guide with respect to detailing and active frontages.	section 7.18, Principle 4 and Principle 11. Where principle 22 seeks to establish positive architectural design principles around fenestration arrangements and officers believe there is value in addressing this point in principle singularly.	
RDG 14.18	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.2	<p><u>Paragraph 8.2</u></p> <p>In principle, this is supported, however it is recommended that the wording is revised to relate specifically to residential amenity.</p> <p>It is considered that the existing wording alludes to a requirement for services and facilities to be provided within a development, which may not be feasible or necessary, particularly for sustainably located sites within the urban area</p>	The preceding paragraph – 8.1 – gives detail regarding the amenity being discussed and so change is considered necessary.	No action required
RDG 14.19	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.3	<p><u>Paragraph 8.3</u></p> <p>The reference to being overheard should be removed, as this is subjective and is not a material planning consideration in respect of privacy and residential amenity.</p> <p>The Council’s approach to separation distances in this Section, including the minimum distance</p>	This paragraph talks about the benefit of privacy including the perceptions thereof. This paragraph does not attempt to set policy nor to apply material weight to a perception, and therefore no change is necessary.	No action necessary.

			of 20m between the rear of two storey buildings directly facing each other, is supported and is in accordance with standards required by other Local Planning Authorities.		
RDG 14.20	Claremont on behalf of Persimmon Homes (Central)	Principle 23	<p><u>Principle 23</u></p> <p>Principle 23, which relates to habitable rooms is supported where this Principle is considered to be pragmatic and in accordance with national guidance and legislation.</p>	Noted	No action required
RDG 14.21	Claremont on behalf of Persimmon Homes (Central)	Principle 24	<p><u>Principle 24</u></p> <p>This is not challenged, however the supporting text to this Principle contained at Paragraph 8.13 identifies that “neighbours will often be particularly distressed if a new development threatens their existing private sunny space”.</p> <p>Although this is identified as supporting text, this is colloquially phrased which is not appropriate for use within this policy document. It is recommended that this reference is therefore removed, particularly given that access to ‘sunny spaces’ is not a material planning.</p>	<p>As noted, this is supporting text in a SPD and is not adding material weight to new concepts.</p> <p>Wording revision at 8.13 to aid clarity</p>	Removal of text from 8.13
RDG 14.22	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.14	<p><u>Paragraph 8.14</u></p> <p>...In this respect, reference made in Paragraph 8.14 to the need to retain sunlight for outdoor spaces should also be removed</p>	Officer agree with need for greater clarity in wording	Removal of reference to habitable external in 8.14

New Residential Design Guide SPD Consultation Summary

<p>RDG 14.23</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 25</p>	<p><u>Principle 25</u></p> <p>The aspirations identified by the Council in Principle 25 are supported, however it is advised that an alternative name for Principle 25 be sought, where presently Principle 24 is also referred to as Daylight and Sunlight. This will ensure clarity in how each of these Principles are applied.</p> <p>In addition, Principle 25 also makes reference to the imperative for ‘good quality’ daylight and sunlight access to be secured for habitable rooms and external spaces. As identified, reference to external spaces in the wording of this Principle should be removed as natural light provision in external spaces is not a material planning consideration.</p> <p>In addition, it is also recommended that the phrasing of this Principle should be revised to refer to ‘adequate’ or ‘sufficient levels’ of natural light. This revision would ensure that the terminology used by the Council accords with that used in reference to daylight throughout the National Design Guide as well as the General Permitted Development Order’s requirement for all habitable rooms to benefit from ‘adequate’ natural light.</p> <p>For clarity, it is also recommended that, if references to sun access are to be retained, then this term requires definition in the</p>	<p>Heading retained, however that of principle 24 revised to differentiate</p>	<p>Principle 24 re-named ‘outlook’ to differentiate</p>
----------------------	---	---------------------	--	--	---

			Glossary of terms presented at the start of the SPD. Without definition, it is considered that this term is ambiguous		
RDG 14.24	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.19	<p><u>Paragraph 8.19</u></p> <p>This approach is considered to be pragmatic where it recognises that urban sites in particular are often constrained by the available site area.</p>	Noted.	No change required
RDG 14.25	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.20 & Table 3	<p><u>Paragraph 8.20 &amp; Table 3</u></p> <p>Paragraph 8.20 and Table 3 of the draft SPD continues on to establish minimum outdoor private amenity spaces for houses. Crucially, the proposed standards seek to differentiate between outdoor amenity spaces which are predominantly North facing and those with face predominantly South, advising that properties with northern facing outdoor amenity spaces will require provision of a larger amenity space. It is considered that this requirement is onerous, and unjustified.</p> <p>Whilst access to high quality amenity space is important for residential amenity, the level of direct sunlight these receive is not a material planning consideration. Indeed, it is considered that this approach fails to recognise the value of outdoor amenity space for both passive and active recreational activity as well as meeting the other outdoor requirements of residents.</p>	Paragraph 8.2 is not introducing a new mandatory requirement, it merely sets out the councils expectations, in order to further clarify this the stated minimums are given as guidance, whilst 8.20 also states that private outdoor amenity space will be considered on a case by case basis.	Insertion of 'guidance' to table 3 rep RDG13 in order to ensure role of expectation articulated clearly

New Residential Design Guide SPD Consultation Summary

			<p>It is maintained that there is no reference to any requirement for outdoor amenity spaces to benefit from adequate natural light throughout the National Design Guide. In fact, Paragraph 132 of the National Design Guide identifies that private amenity spaces such as gardens can enhance both visual and outdoor amenity, whilst also providing a degree of privacy and separation for living areas from adjoining public spaces. In this respect, it cannot be considered that the Council’s approach to outdoor amenity space provision for houses is justified and references to differentiated requirements for North and South facing garden areas are removed.</p>		
RDG 14.26	Claremont on behalf of Persimmon Homes (Central)	Principle 26	<p><u>Principle 26</u></p> <p>This requirement is not a national policy requirement and is not identified as a requirement within the Council’s adopted Local Plan. This requirement is therefore not considered to be in accordance with adopted national and local planning policy and is therefore unjustified.</p> <p>Principle 26 also seeks to require private outdoor garden spaces to be inclusive of access not dependant upon routes through internal spaces and have level access from the home. Although these are identified as aspirations to be delivered where possible and feasible, it</p>	<p>This principle makes clear that it is not a requirement but should be in place where possible and articulates good design. Clearly, as noted in the SPD there will be occasions where this is not feasible, such as outlined in the representation.</p>	<p>No action required.</p>

			<p>considered that these aspirations are onerous and should therefore be removed. For example, providing inclusive access without using routes through internal spaces is likely to be achievable only for detached and semi-detached dwellings. For terraced houses, satisfying this would be reliant upon provision of side gates which deliver access to several gardens, the principle of which is not generally supported due to security risk.</p> <p>This is confirmed by Paragraph 10.4 of Secured by Design which requires access gates to rear gardens to be located on or as near to the front of the building line as possible. Moreover, providing level access to all outdoor amenity spaces is not considered to be pragmatic or necessary. It is recommended that this aspiration is clarified such that it is applied only to dwellings which are built to wheelchair accessible standards in accordance with building regulations.</p>		
RDG 14.27	Claremont on behalf of Persimmon Homes (Central)	Principle 27	<p><u>Principle 27</u></p> <p>Principle 27 is currently referred to as 'Outdoor Amenity'. It is recommended that this Principle is renamed 'Communal Outdoor Amenity Space' for clarity as Principle 26 is presently also referred to as 'Outdoor Amenity'.</p> <p>Principle 27 reiterates the Council's aspiration for amenity spaces to benefit from direct sunlight, expecting external communal outdoor</p>	<p>Heading is an error and will be amended.</p> <p>The wording is clear that it is not a requirement and therefore does not set new policy. The aspiration for communal amenity space for have sunlight is entirely reasonable.</p>	Amend heading of Principle 27 to "Outdoor Amenity - External Community Space"

			<p>amenity space to be located such that it receives sunlight for a substantial part of the day. As demonstrated throughout these representations, this requirement is considered to be unsubstantiated by national and local planning policy and should therefore be removed where access to sunlight is not a material planning consideration with respect to outdoor amenity spaces</p>		
RDG 14.28	Claremont on behalf of Persimmon Homes (Central)	Paragraphs 8.24 - 8.26	<p><u>Paragraphs 8.24 - 8.26</u></p> <p>The Council’s pragmatism in considering conversion schemes on a case-by-case basis is supported.</p> <p>However, the expectation for schemes to deliver alternate outdoor amenity space provision where private amenity space cannot be delivered is not supported. It should be recognised that conversion schemes are often constrained by the available site area, such that alternate outdoor space may not be deliverable. Indeed, it should be appreciated that proximity to local services and facilities, access to local green spaces, and the size of internal accommodation, are factors which reduce residents’ reliance upon on-site amenity space provision such that a failure to provide private amenity space on site may not translate into a material loss of amenity for future residents, especially for sustainably located sites within the urban area</p>	<p>Whilst we note that there may be occasions that such constraints render the reasonable expectation of provision of suitable amenity space, we disagree that this expectation should be disregarded for all applicable sites.</p>	No change required.

<p>RDG 14.29</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>		<p><u>Principle 28</u></p> <p>This Principle should be renamed where it is presently referred to as ‘Outdoor Amenity’ which is ambiguous.</p> <p>This Principle requires all ground floor flats to have access to a well-defined private area of amenity space which directly adjoins and is accessible from the flat, whilst all flats above ground floor are expected to be provided by balconies unless conservation, privacy, or heritage issues negate against their use. The requirements of this Principle is strongly opposed, where these requirements are considered to be onerous and a limitation on development.</p> <p>This is over and above the design principles set out within the National Design Guide which recognises at Paragraph 132 the balconies and private gardens can enhance visual and outdoor amenity. In addition, this Principle also contradicts guidance contained within the draft SPD and within the National Design Guide which seek to establish built form and appearance that adds new character and difference to places, where this Principle will allow for limited variation in the architectural style of flatted developments.</p> <p>Principle 28 also identifies that predominantly</p>	<p>Wording omitted in respect of north facing balcony and meeting standards, accepting that north facing elements can play a positive role, however ‘amenity’ inserted within principle 28 to enable assessment of amenity value of proposed balconies. Officers accept that there will be instances where these positive principles may be difficult to achieve, therefore ‘wherever possible’ wording inserted in respect of ground floor private amenity.</p> <p>Throughout principles, new mandatory requirements are not established, rather design expectations set.</p>	<p>Principle 28 heading amended to include “Apartment Schemes”.</p> <p>‘Wherever possible’ inserted in ground floor amenity principles</p> <p>Omission of north facing wording, and insertion of ‘amenity’ consideration.</p>
----------------------	---	--	---	--	---

			<p>north facing balconies with no access to sunlight during the year, or balconies in close proximity to adjoining main roads will not be considered to have fulfilled the obligations of this Principle. It is maintained that this Principle fails to recognise the contribution that north facing balconies make in providing amenity space for residents, particularly where it has been identified that the levels of sunlight received by an amenity space is not a material planning consideration.</p> <p>It is considered that Principle 28 requires a more holistic and pragmatic approach to amenity space provision in flatted developments which recognises the contribution of other, more innovative, forms of amenity space provision such as communal rooftop gardens and internal communal amenity spaces.</p> <p>The prescriptive approach to private amenity space provision in flatted developments proposed through Principle 28 will also have significant implications on the capacity of sites as well as the viability of schemes which should also be recognised by the Council. The approach proposed by the Council will therefore serve to restrict housing delivery in sustainable urban locations as well as the potential regeneration of brownfield sites</p>		
--	--	--	---	--	--

<p>RDG 14.30</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 29</p>	<p><u>Principle 29</u></p> <p>Whilst this Principle is supported, Principle 29 should be renamed so that it clearly relates to Residential Care Homes.</p> <p>The Principle is currently named 'Outdoor Amenity' and thus is not easily distinguishable from other Principle's throughout the SPD.</p>	<p>Accepted for clarity – heading to be amended.</p>	<p>Heading to be amended to include "Residential Care Homes"</p>
<p>RDG 14.31</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 30</p>	<p><u>Principle 30</u></p> <p>Clarification of this is required where 'unrelieved' is ambiguous, and in particular clarification of whether this relates to materials, height or continuous frontage to ensure clarity in the application of this Principle.</p>	<p>Officers accept additional clarity on the principle in this case would be beneficial.</p>	<p>Clarification to 'continuous, unbroken' added to aid clarity</p>
<p>RDG 14.32</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 32</p>	<p><u>Principle 32</u></p> <p>Whilst this requirement is supported in principle, it is advised that the Council should instead identify the incorporation of soft landscaping into areas of hardstanding as an aspiration rather than requirement. Instead, the Council should recognise that it is not always appropriate or deliverable to incorporate soft landscaping into areas of hardstanding, for example where this may obstruct visibility splays.</p>	<p>Principle 32 outlines the Councils expectations with regards to boundary treatments, it does not seek to introduce new mandatory requirements and therefore no change is necessary.</p>	<p>No change required.</p>

New Residential Design Guide SPD Consultation Summary

RDG 15.1	Marrons Planning/ Richborough Estates	General	<p><u>General</u></p> <p>Whilst the draft SPD is seeking to provide further guidance in respect of design and specifically Policy DE1, it is apparent that some of the proposed requirements go beyond those of Policy and therefore exceed what is allowed for in the Town and Country Planning (Local Planning) (England) Regulations 2012</p>	<p>This SPD seeks to outline the council’s expectations with regards to the design of new residential development, it does not seek to introduce new mandatory requirements.</p>	<p>No change required</p>
RDG 15.2	Marrons Planning/ Richborough Estates	Principle 5	<p><u>Principle 5: Street Design</u></p> <p>Even in recognition of the wording which sets out that shared spaces “should” be incorporated (rather than “must”, for example), the requirement is still considered to be not sufficiently evidenced and lacking any Policy support in the Local Plan.</p> <p>As recognised at Paragraph 6.10 of the SPD, it is important that the design of shared spaces is carefully considered to ensure that the needs of all road users are catered for. It is therefore inappropriate to suggest that all developments of over 80 dwellings should contain an element of shared spaces, as it may not be appropriate for all such schemes.</p> <p>On that basis, it is recommended that the sentence “developments of over 80 dwellings should contain a mixture of shared</p>	<p>The delivery of different approaches to street design aids wider scheme legibility and the delivery of street hierarchy on larger schemes and is therefore promoted as a positive consideration in schemes over 200 units.</p> <p>Alongside this, wording within the SPD at 6.10 embeds a case by case assessment of such design approaches</p>	<p>Revision to 200 unit threshold to accord with council definition of large scale development size.</p>

			<p>space and zones where the movement of vehicles takes a higher priority” is removed from the second criterion of Principle 5. As a minimum, it is requested that the reference to developments of over 80 dwellings is removed from the Principle text and is added to the supporting text, with reference instead to large-scale residential developments being encouraged to incorporate shared spaces where they are appropriate.</p>		
RDG 15.3	Marrons Planning/ Richborough Estates	Principles 9/10/12,	<p><u>Principles 9/10/12</u>                  Even in recognition of the wording which is clear that such parking arrangements “should” be made (rather than “must”, for example), the requirements are still considered to be not sufficiently evidenced and lacking any Policy support in the Local Plan.</p> <p>There are likely to be schemes where more than 3 parking spaces can be provided without intervening landscaping, where on-plot parking is more suitable to the frontage, or where a cluster of more than 3 on-street parking bays is suitable. As drafted, the inclusion of such criteria in Principles 9, 10 and 12 mean they are unduly onerous and restrictive, and could prevent sustainable development proposals from coming forward</p>	As clearly indicated in the policy (and noted in the representation) the Principle does not set new requirements and is an articulation of good design. As such it will not be able to fetter development but help ensure that well designed developments come forward. If there are site circumstances that prevent the expectations discussed in the SPD then they will be dealt with on a case by case basis. As such, there is no need to lower our standards in order to incorporate all possible constraints.	No action required.

New Residential Design Guide SPD Consultation Summary

			As such, it is recommended that the criteria referenced are removed from Principles 9, 10 and 12. As a minimum, it is requested that such references are removed from the Principle text and are added to the supporting text, where parking design which has intervening landscaping, side or rear on-plot parking and on-street parking bays which limit large clusters are encouraged where appropriate.		
RDG 15.4	Marrons Planning/ Richborough Estates	Principle 19	<p><u>Principle 19</u> The National Planning Policy Framework is clear at Paragraph 131 f) that “planning policies and decisions should ensure that [...] developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”, with Footnote 49 adding that “planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified”</p> <p>Insufficient justification is provided for the need to impose the optional nationally described space standard, and in any case this requirement would need to be established in a</p>	The SPD does not seek to place a requirement for the application of the National Described Spatial Standards, rather sets an expectation, and therefore no changes are necessary.	No change required.

			<p>Development Plan Document such as the Local Plan rather than through a SPD, particularly where there is no Policy support.</p> <p>As such, it is recommended that Principle 19 is removed, or at the very least amended to provide support for residential development proposals which adhere to the nationally described space standard, but recognise that such a standard is not necessary in all residential schemes.</p>		
RDG 16.1	NSC		<p><u>General</u></p> <p>Over-emphasis in the report on ‘city-scapes’ and not enough on major estate housing schemes.</p> <p>Developers are still getting away with unimaginative ‘tick-tacky’ boxes cheap estate builds with very poor visual integrity.</p> <p>Little pressure on developers to integrate imaginative architectural detailing, architectural design.</p> <p>Boundary treatments – unmanaged/unmaintained/unpoliced – Road ‘adoption’ delays (some outstanding for over 20 years!).</p> <p>Historically, insufficient soft landscaping on new housing estates.</p>	<p>Comments noted. However, this SPD sets the design expectations for new residential development across the city, and deals in detail with the matters such as architectural detailing, visual integrity and boundary treatments.</p> <p>Due to the nature of the document it cannot create new requirements on matters such as PV panels, for example.</p>	No changes required.

New Residential Design Guide SPD Consultation Summary

			No direction on photovoltaic or heat-source energy integration into major housing developments.		
RDG 16.2	NSC		<p><u>Cumulative effect of residential developments</u></p> <p>However, there has never been account taken of the cumulative effect of residential development across a region – all applications and assessments are made on their individual merits only. When aggregated, their overall effect appears to be ignored. The outcome is to completely ignore the cumulative effects on adjacent neighbourhoods. Assessments are only ever ‘site-specific’.</p>	The nature – and legal framework – of planning is that each application is judged on its own merits. However, cumulative impacts on matter such as, for example, transport or biodiversity, are considered in detail.	No change required.
RDG 16.3	NSC		<p><u>Community Engagement</u></p> <p>Inadequate or non-existent Community and neighbour engagement at the pre-planning stage, e.g. the Bruker development on Banner Lane CV4.</p> <p>The progress of major applications has historically NOT been communicated by developers to the local community or neighbours after the initial Outline Application, e.g. the Bruker development on Banner Lane CV4.</p>	Noted but such matters are not relevant to this SPD which focuses on design guidance for new residential development	No change required.

This page is intentionally left blank

**Strategic Environmental Assessment of the Residential Design  
Guide Supplementary Planning Document**

---

**Coventry City Council**

**Strategic Environmental Assessment Screening Assessment**

**June 2022**

## **1. Introduction**

1.1 This screening report has been produced to consider whether the Residential Design Guide Supplementary Planning Document (SPD) prepared by Coventry City Council should be subject to a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, as amended by The Environmental Assessments and Miscellaneous Planning (Amendment)(EU Exit) Regulations.

1.2 Paragraph: 008 of the Planning Guidance<sup>1</sup> states that supplementary planning documents may in exceptional circumstances require SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. This screening statement considers whether there are any impacts which have not already been assessed within the Coventry Local Plan which was adopted on 6th December 2017<sup>2</sup>, and determines whether or not SEA is needed for this SPD.

## **2. The Residential Design Guide SPD: Context**

2.1 The Draft Residential Design Guide SPD sets out further detail on existing policies contained within the Coventry City Council Local Plan, in particular Policy DE1: Ensuring High Quality Design. The Local Plan is the City Council's statutory planning framework which sets out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created, enhanced and protected.

2.2 Delivering high quality design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. The aim of this SPD is to facilitate the delivery of good design as set out in the plan and in compliance with the most up to date national policy as set out in the National Planning Policy Framework

2.3 The additional guidance provided within the SPD sets out a series of principles for ensuring high quality design for residential design including concept plans, connectivity, street design, density, plots, parking, boundary treatments, building lines, sustainable design, building heights, scale and massing, roofscapes, space standards, adaptable homes, architectural detailing, architectural design, habitable rooms, daylight and sunlight, outdoor amenity, boundary treatments, meter cabinets, vehicle crossings and hardstandings

## **3. The Screening Process**

3.1 The screening assessment is undertaken in two parts: the first will assess whether the SPD requires screening for SEA and the second part of the assessment will consider

---

<sup>1</sup> Reference ID: 11-008-20140306

<sup>2</sup> <https://www.coventry.gov.uk/localplan>

whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

**Table 1: Is SEA screening required?**

Environmental Regulations Paragraph detail	Comments
<p>2.(1) In these Regulations- [...] "plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which— (a) are subject to preparation and adoption by an authority at national, regional or local level; (b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case, (c) are required by legislative, regulatory or administrative provisions</p>	<p>Yes, this applies.</p> <p>The SPD is subject to preparation and adoption at local level. Whilst the SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act it will, if adopted, supplement the development plan and be a material consideration in the assessment of planning applications.</p>
<p><u>Environmental assessment for plans and programmes; first formal preparatory act on or after 21st July 2004</u> 5.(2) The description is a plan or programme which— (a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and (b) sets the framework for future development consent of projects listed in Annex I or II Directive 2011/92/EU(4) of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment.</p>	<p>Yes, this applies.</p> <p>The SPD is prepared for town and country planning purposes. It supplements the planning policy framework of the Coventry City Local Plan, by providing detailed guidance as to how these policies are interpreted for future consent of projects listed in Schedule II of Directive 2011/92/EU(4).</p>
<p>3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to</p>	<p>No this does not apply.</p>

<p>require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</p>	<p>The SPD is not likely to affect sites and has been determined not to require an assessment pursuant to any law that implemented Article 6 or 7 of the Habitats Directive.</p> <p>Habitat Regulations Assessment is not required. The Habitat Regulation Assessment undertaken in 2016 for the Coventry City Local Plan concluded that the plan would not cause a negative effect alone or in combination with other plans. The SPD does not provide any guidance which alters the impact of the policy on designated sites.</p>
<p>6) An environmental assessment need not be carried out—  (a)for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level, or  (b)for a minor modification to a plan or programme of the description set out in either of those paragraphs,</p>	<p>Yes, this applies.</p> <p>The SPD provides further detail on the implementation of design policy within the adopted Local Plan. This applies to the whole administrative area of Coventry City Council.</p>
<p><u>Determinations of the responsible authority<sup>3</sup></u>  9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in—  (a)paragraph (4)(a) and (b) of regulation 5;  (b)paragraph (6)(a) of that regulation; or  (c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects.  (2) Before making a determination under paragraph (1) the responsible authority shall—  (a)take into account the criteria specified in Schedule 1 to these Regulations; and  (b)consult the consultation bodies.</p>	<p>This screening opinion has been prepared using the criteria specified in Schedule 1 as presented in Table 2.</p> <p>The statutory bodies (Natural England, Historic England and the Environment Agency) are to be consulted as required.</p>

<sup>3</sup> “Responsible authority”, in relation to a plan or programme, means the authority by which or on whose behalf it is prepared (Regulation 2(1)(a))

**Table 2: will the SPD have a significant effect on the environment<sup>4</sup>**

SEA requirement	Comments
1: The characteristics of plans and programmes, having regard, in particular, to	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The SPD has a minor role in setting the framework for projects. While the SPD forms a material consideration in decisions on planning applications, it has no influence on the location or volume of projects nor does it allocate resources.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD does not create new policies but will support the policies in the adopted Local Plan. Other plans and programmes may outlive the SPD and during their preparation will be steered by national legislation and policy.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The purpose of the SPD is to provide guidance to support the design policy of the adopted Local Plan. The Local Plan SA/SEA assessed this. The purpose of the SPD is to ensure these beneficial impacts of that policy are delivered and maintained which contributes to promoting sustainable development.
(d) environmental problems relevant to the plan or programme; and	There are no environmental problems relevant to this SPD: it elaborates adopted Local Plan policy.
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD has no relevance to the implementation of retained EU law.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—	
(a) the probability, duration, frequency and reversibility of the effects;	The SPD is not allocating sites for development. The SPD is to provide

<sup>4</sup> As set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

	guidance for the application and implementation of the policies in the adopted Local Plan and is not expected to give rise to any significant environmental effects.
(b) the cumulative nature of the effects;	The SPD is not considered to have any significant cumulative effects. As the document provides further guidance to adopted local plan policies, but does not set policies itself, it cannot contribute to cumulative impacts in combination with the Local Plan.
(c) the transboundary nature of the effects;	There are no transboundary effects as this SPD relates to the Coventry City Council area only. Any potential significant transboundary environmental effects have already been assessed as part of the local plan's sustainability appraisal, the Habitat Regulations Assessment and the plan's examination process.
d) the risks to human health or the environment (for example, due to accidents);	The SPD poses no risk to human health.
(e)the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The SPD relates to Coventry City Council's administrative area only.
(f)the value and vulnerability of the area likely to be affected due to— (i)special natural characteristics or cultural heritage; (ii)exceeded environmental quality standards or limit values; or (iii)intensive land-use;	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.
(g)the effects on areas or landscapes which have a recognised national, Community or international protection status.	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these matters are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.

#### **4. Conclusion and Screening Recommendation**

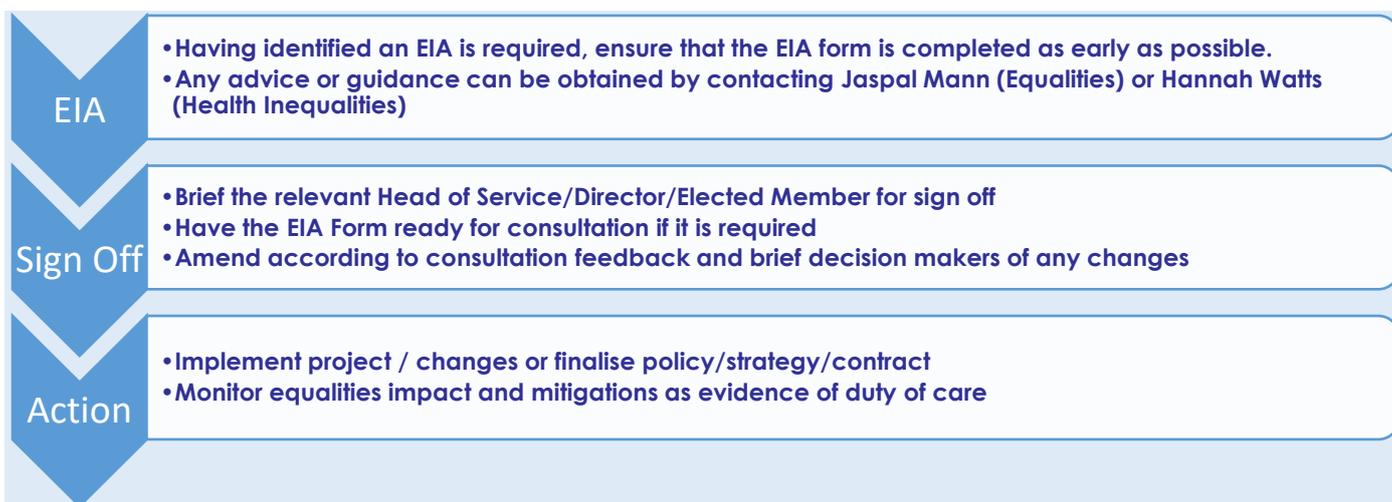
- 4.1 This screening assessment identifies that the SPD will provide guidance to support the design policy of the Coventry City Council adopted Local Plan. It is concluded that the SPD is unlikely to have significant environmental effects and therefore that Strategic Environmental Assessment is not required.

This page is intentionally left blank

## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Title of EIA</b>	<b>EIA Residential Design Guide SPD</b>	
<b>EIA Author</b>	Name	<b>Clare Eggington</b>
	Position	<b>Planning Policy Manager</b>
	Date of completion	<b>08/06/2022</b>
<b>Head of Service</b>	Name	<b>David Butler</b>
	Position	<b>Head of Planning Policy and Environment</b>
<b>Cabinet Member</b>	Name	<b>Councillor David Welsh</b>
	Portfolio	<b>Housing and Communities</b>



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

### SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (please give details) *Supplementary Planning Document for Householder Design*



### 1.2 In summary, what is the background to this EIA?

The Residential Design Supplementary Planning Document (SPD) adds further detail to the Local Plan which was adopted on 6<sup>th</sup> December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

Delivering high quality residential design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. The aim of this SPD is to facilitate the delivery of high quality design as set out in the plan and in compliance with the most up to date national policy as set out in the National Planning Policy Framework.

The additional guidance provided within the SPD sets out detail for developers who are designing residential schemes.

### 1.3 Who are the main stakeholders involved? Who will be affected?

Developers, those who will live in the properties, the communities where the properties will be located, those who have an interest in the way in which plans are prepared (eg the various statutory consultees)

### 1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Service

## SECTION 2 – Consideration of Impact

*Refer to guidance note for more detailed advice on completing this section.*

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

### 2.1 Baseline data and information

## EQUALITY IMPACT ASSESSMENT (EIA)



Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan was independently examined by a Planning Inspector to ensure that its policies were robust and formulated using appropriate evidence before it could be sound and capable of adoption. Further detail on the Local Plan and the evidence base can be found here

<https://www.coventry.gov.uk/localplan>

This SPD expands upon adopted Local Plan Policy DE1, Ensuring High Quality Design. It provides additional for guidance developers who are designing residential schemes to ensure they produce high quality design.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

*\*Any impact on the Council workforce should be included under question 2.6 – **not below***

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Whilst those aged 0-18 would generally not be directly involved in the design process, many will live in new build properties on new residential developments and the SPD will ensure that such developments are of a high standard. 19.5% of the population are aged 0-15 so well over a fifth of the population (when the 16-18 year olds are factored in) could potentially benefit.
Age 19-64	P	67% of the population of Coventry are of working age (16-64). Many will live in new build properties on new residential developments and the SPD will ensure that such developments are of a high standard.
Age 65+	P	13.5% of Coventry's population aged above 65. As above, many will live in new build properties on new residential developments and the SPD will ensure that such developments are of a high standard. The guide provides advice on ensuring that developments are

## EQUALITY IMPACT ASSESSMENT (EIA)



		accessible and adaptable, which could assist ageing residents in being able to remain in their own homes and communities.
Disability	<b>P</b>	17.7% of Coventry's residents have a limiting long term health problem or disability. The SPD encourages good design in new build developments to ensure that people can adapt their homes and communities in a way which meets their changing needs.
Gender reassignment	<b>P</b>	Good residential design has a positive impact on everyone in the community.
Marriage and Civil Partnership	<b>P</b>	Good residential design has a positive impact on everyone in the community.
Pregnancy and maternity	<b>P</b>	Good residential design has a positive impact on everyone in the community.
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>P</b>	Good residential design has a positive impact on everyone in the community.
Religion and belief	<b>P</b>	Good residential design has a positive impact on everyone in the community.
Sex	<b>P</b>	Good residential design has a positive impact on everyone in the community.
Sexual orientation	<b>P</b>	Good residential design has a positive impact on everyone in the community.

### HEALTH INEQUALITIES

<b>2.3</b>	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p>
------------	--

## EQUALITY IMPACT ASSESSMENT (EIA)



<p><b>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</b></p> <p><b>If you need assistance in completing this section please contact: Hannah Watts (<a href="mailto:hannah.watts@coventry.gov.uk">hannah.watts@coventry.gov.uk</a>) in Public Health for more information. More details and worked examples can be found at <a href="https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx">https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</a></b></p>		
Question	Issues to consider	
<p>2.3a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> <li>● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>)</li> <li>● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation</li> </ul>	
	<p>Response:</p> <p>The Residential Design Guide SPD supplements the policies of the adopted Local Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See <a href="https://www.coventry.gov.uk/localplan">https://www.coventry.gov.uk/localplan</a> This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to affordable housing. See <a href="https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd">https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd</a></p> <p>Whilst only major residential applications are subject to HIA, the explanatory text still encourages the use of the toolkit for smaller developments than those covered by the policy (which relates to developments of 150 homes or more, or a site area of 5 hectares or more). This Residential Design SPD will help provide further guidance on good design and this will help to ensure decent living standards in terms of amenity, accessibility and adaptability, avoiding negative impacts and supporting people to carry on living in their community.</p>	
<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share</p>	<p><b>Consider and answer below:</b></p> <ul style="list-style-type: none"> <li>● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income</li> <li>● Consider what the unintended consequences of your work might be</li> </ul>	



protected characteristics																	
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Health Impact Assessment SPD referred to above includes the following:</p> <p><b>Category 1: Housing Quality and Design</b></p> <p>Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has an impact on community welfare, cohesion and mental wellbeing.</p> <table border="1" data-bbox="400 824 1390 1283"> <thead> <tr> <th>Considerations</th> <th>Negative effects</th> <th>Positive Effects</th> <th>Relevant Local Plan Policies and Supplementary Planning Documents</th> </tr> </thead> <tbody> <tr> <td rowspan="3"> <ul style="list-style-type: none"> <li>• Accessible and adaptable dwellings</li> <li>• Internal space standards, orientation and layout</li> <li>• Affordable housing and dwelling mix</li> <li>• Energy efficiency</li> <li>• High Quality Design</li> </ul> </td> <td>A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.</td> <td>Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.</td> <td rowspan="3"> <ul style="list-style-type: none"> <li>• AC2: Road Network</li> <li>• DE1: Ensuring High Quality Design</li> <li>• DS3: Sustainable Development Policy</li> <li>• EM2: Building Standards</li> <li>• EM5: Sustainable Drainage Systems SuDS</li> <li>• H3: Provision of New Housing</li> <li>• H4: Securing a Mix of Housing</li> <li>• H5: Managing Existing Housing Stock</li> <li>• H6: Affordable Housing</li> <li>• H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation</li> </ul> </td> </tr> <tr> <td>Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.</td> <td>Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.</td> </tr> <tr> <td>The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.</td> <td>Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be</td> </tr> </tbody> </table> <table border="1" data-bbox="365 1317 1390 1379"> <tr> <td></td> <td></td> <td>provided in the community more easily.</td> <td> <ul style="list-style-type: none"> <li>• Sustainable Urban Extension Design Guide SPD</li> </ul> </td> </tr> </table>	Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents	<ul style="list-style-type: none"> <li>• Accessible and adaptable dwellings</li> <li>• Internal space standards, orientation and layout</li> <li>• Affordable housing and dwelling mix</li> <li>• Energy efficiency</li> <li>• High Quality Design</li> </ul>	A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.	Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.	<ul style="list-style-type: none"> <li>• AC2: Road Network</li> <li>• DE1: Ensuring High Quality Design</li> <li>• DS3: Sustainable Development Policy</li> <li>• EM2: Building Standards</li> <li>• EM5: Sustainable Drainage Systems SuDS</li> <li>• H3: Provision of New Housing</li> <li>• H4: Securing a Mix of Housing</li> <li>• H5: Managing Existing Housing Stock</li> <li>• H6: Affordable Housing</li> <li>• H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation</li> </ul>	Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.	Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.	The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be			provided in the community more easily.	<ul style="list-style-type: none"> <li>• Sustainable Urban Extension Design Guide SPD</li> </ul>
Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents														
<ul style="list-style-type: none"> <li>• Accessible and adaptable dwellings</li> <li>• Internal space standards, orientation and layout</li> <li>• Affordable housing and dwelling mix</li> <li>• Energy efficiency</li> <li>• High Quality Design</li> </ul>	A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.	Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.	<ul style="list-style-type: none"> <li>• AC2: Road Network</li> <li>• DE1: Ensuring High Quality Design</li> <li>• DS3: Sustainable Development Policy</li> <li>• EM2: Building Standards</li> <li>• EM5: Sustainable Drainage Systems SuDS</li> <li>• H3: Provision of New Housing</li> <li>• H4: Securing a Mix of Housing</li> <li>• H5: Managing Existing Housing Stock</li> <li>• H6: Affordable Housing</li> <li>• H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation</li> </ul>														
	Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.	Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.															
	The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be															
		provided in the community more easily.	<ul style="list-style-type: none"> <li>• Sustainable Urban Extension Design Guide SPD</li> </ul>														
	<p>b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p> <p>Ensuring well designed developments to meet a range of needs and circumstances is a key aim of the Local Plan design policy and the SPD provides the further detail to ensure that policy can be delivered.</p> <p>Policy DE1 of the Local Plan sets out the context, and the SPD provides the detail for ensuring that residential developments are well designed and appropriate to meet the changing needs of the communities impacted.</p>																

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

## EQUALITY IMPACT ASSESSMENT (EIA)



This was considered through the Local Plan (the 'parent document'), this document provides the detail to ensure the Local Plan policies can be delivered effectively.  
The SPD elaborates on adopted Policy DE1 to ensure that high standards of design are implemented.

### 2.5 How will you monitor and evaluate the effect of this work?

Planning applications and their outcomes are monitored. However there is scope to improve the monitoring process and this is an action which will be undertaken by the planning policy team to consider moving forwards in terms of the effectiveness of design policy. In terms of the outcomes of further monitoring, if there are issues which are emerging, this can then be fed into a review of the wider local Plan policies.

### 2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: [lucille.buckley@coventry.gov.uk](mailto:lucille.buckley@coventry.gov.uk)

#### **Headcount:**

##### **Sex:**

Female	
Male	

##### **Age:**

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

##### **Disability:**

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

##### **Ethnicity:**

##### **Religion:**

Any other	
Buddhist	
Christian	
Hindu	
Jewish	

## EQUALITY IMPACT ASSESSMENT (EIA)



White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

**Sexual Orientation:**

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

**As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:**

No impact has been identified for one or more protected groups

Positive impact has been identified for one or more protected groups

Negative impact has been identified for one or more protected groups

Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

<b>Signed: Head of Service: David Butler</b>	<b>Date:</b>
<b>Name of Director: Andrew Walster</b>	<b>Date sent to Director:</b>

## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Name of Lead Elected Member:</b> Councillor D Welsh	<b>Date sent to Councillor:</b>
---	---------------------------------

Email completed EIA to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk)

This page is intentionally left blank



---

Cabinet Member for Housing and Communities

13 December 2022

**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:**

Tall Buildings Design Guide and Three Spires View Management Framework Supplementary Planning Document (SPD) - Adoption

---

**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

---

**Executive Summary:**

This report seeks to adopt the Tall Buildings Design Guide and Three Spires View Management Framework Supplementary Planning Document (SPD) following public consultation which was undertaken between 03 August and 14 September 2022.

SPDs add further detail to the policies in the development plan but cannot introduce new policy. SPDs provide additional guidance for development and are capable of being a material consideration when making decisions on planning applications.

The city has seen an increase in tall building developments in the last few years, and the first part of the SPD – the Tall Buildings Design Guide - sets out the criteria and information that need to be provided alongside such applications.

The second part of the SPD – the Three Spires View Management Framework – details the protected view of Coventry's famous spires ensuring their preservation into the future. Responses to the consultation have been analysed and taken account of when amending the SPD. The proposed final version is attached at Appendix 1, and a summary of representations along with responses and proposed amendments can be seen at Appendix 2.

**Recommendations:**

1. That Cabinet adopts the Tall Buildings Design Guide and Three Spires View Management Supplementary Planning Document (SPD).
2. That Cabinet delegates authority to the Strategic Lead (Planning) following consultation with the Cabinet Member for Housing and Communities to make any necessary further non-substantive (minor) changes to the document.

**List of Appendices included:**

Appendix 1: Tall Buildings Design Guide & Three Spires View Management Framework Supplementary Planning Document.

Appendix 2: Consultation: summary of representations and responses

Appendix 3: Strategic Environmental Assessment Screening Report

Appendix 4: Equalities Impact Assessment

**Background papers:**

None.

**Other useful documents:**

Local Plan: adopted December 2017

National Planning Policy Framework July 2021

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

No. Although this report will not be considered by Scrutiny, a report was considered by the Communities and Neighbourhoods Scrutiny Board (4) on 6 October 2022 as part of the consultation process.

**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:** Tall Buildings Design Guide and Three Spires View Management Framework Supplementary Planning Document SPD) - Adoption

**1. Context (or background)**

- 1.1 The National Planning Policy Framework (NPPF) defines Supplementary Planning Documents (SPDs) as 'documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues.... Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan'.
- 1.2 The delivery of a Tall Buildings SPD is a provision of Policy CC7 of the City Centre Area Action Plan, adopted by the Council in 2017. Policy CC7 also establishes the protected views of the city's famous spires. Whilst the document is fairly technical in nature it will help ensure where tall buildings are developed they will integrate well and be positive contributors to the city.
- 1.3 The SPD has two parts. The first part deals with the information and considerations required for the application for a tall building anywhere within the city, including a clear definition of what a tall building is. It also sets the requirement for a Tall Buildings Statement to be submitted alongside a relevant application, and what should be detailed within it.
- 1.4 The second part of the SPD uses a range of visual tools to fully articulate the protected views of the three spires, established in the City Centre Area Action Plan, 2017. Each of the 17 views are articulated, and use of 3D imagery enhances this with a clearly defined corridor that must be protected. Furthermore, it identifies specific areas of constraint where heights are severely restricted in order to protect those valued views.
- 1.5 Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. This includes a minimum statutory public consultation period of four weeks: the Council's recently adopted Statement of Community Involvement however sets out a local standard that SPDs should be consulted on for six weeks. Consultation for this report took place between 03 August to 14 September 2022.
- 1.6 It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. The screening opinion undertaken is attached at Appendix 3. This concludes that no SEA is needed as the SPD elaborates on existing policy. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. The screening report was made publicly available for comment at the same time as the SPD was being consulted on.
- 1.7 Finally, an Equalities Impact Assessment (EIA) been undertaken, this is attached at Appendix 4 and was publicly consulted on.
- 1.8 Responses have been analysed and the SPD amended accordingly. In line with the legislation, this report includes a statement setting out the details of the consultation, a

summary of the main issues raised and how they have been addressed. This is contained at section 3 and Appendix 2 of this report.

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

- 2.1 The Council could choose not to adopt the SPD. However, this will mean that applicants and officers are deprived of the additional detail of the SPD which will ensure that tall buildings come forward in appropriate locations within the city. This option is therefore not recommended.
- 2.2 The Council could choose to adopt the SPD, with the changes as set out in Appendix 1. This will ensure that applicants and officers are clear regarding the information requirements when applying for a tall building, and to effectively ensure that the valuable views of the three spires are maintained. For these reasons this is the recommended option.

## **3 Results of consultation undertaken**

- 3.1 Public consultation was undertaken between 03 August and 14 September 2022. The minimum statutory period for SPD consultations is four weeks, the council's Statement of Community Involvement recommends six weeks.
- 3.2 The Council made all consultation documentation available on its website and in hard copy at the Council House and all libraries. A notification email was sent to all consultees on the planning policy consultation database which provided background to the SPD consultation and explained where people could view the documents and the various ways in which they could provide comments. The council also used its social media platforms and local press to publicise the consultation.
- 3.3 Regulation 12 of the Local Planning Town and Country Planning (Local Planning) (England) Regulations 2012 states that, before a local planning authority can adopt an SPD it must first prepare a statement setting out the persons consulted during the preparation of the document, with a summary of the main issues raised and how they have been addressed in the SPD. This report addresses these requirements, and details of the comments submitted, the officer response and changes made to the SPD as a result can be viewed at Appendix 2.
- 3.4 Alongside the SPD, the SEA screening opinion and Equality Impact Assessment were made available for public comment as set out in section 1 of this report. In terms of the SEA screening, the statutory consultation bodies Natural England and Historic England concurred with the council's view that Strategic Environmental Assessment is not required. The Environment Agency did not respond. The screening assessment at Appendix 3 has been updated to reflect this conclusion. The Equality Impact Assessment at Appendix 4 has been updated as a result of internal guidance although no external responses were received on the matter.

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

- 4.1 The SPD will be adopted as soon as practicable.

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

## 5.1 Financial implications

There are no financial implications associated with this report.

## 5.2 Legal implications

There are no direct implications as a result of this report. Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) also require the Council to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken.

## 6 Other implications

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

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 document focuses upon supporting local communities by creating an attractive, cleaner and greener city and enhancing the quality of public spaces.

### 6.2 How is risk being managed?

There are no risks associated with this report.

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

No direct impact.

### 6.4 Equalities Impact Assessment EIA

A full Equality and Impact Assessment (EIA) 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). The Supplementary Planning Document elaborates on Local Plan policy and so a further EIA has been undertaken (Appendix 4).

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

Climactic issues related to tall buildings are picked by the SPD and the Tall Building statement requires their identification, avoidance or mitigation to be demonstrated.

### 6.6 Implications for partner organisations?

There are no significant impacts for partner organisations.

#### **Report author:**

#### **Name and job title:**

David Butler

Head of Planning Policy & Environment

**Service**

Planning Policy and Environment – Planning & Regulation

**Tel and email contact:**

Tel: 024 7697 2343

Email: David.butler@coventry.gov.uk

Enquiries should be directed to the above person.

This report is published on the council's website:

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

<b>Contributor/ approver name</b>	<b>Title</b>	<b>Service</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Lara Knight	Governance Services Officer	Law and Governance	09/11/22	18/11/22
Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	09/11/22	16/11/22
<b>Names of approvers for submission: (officers and members)</b>				
Cath Crosby	Lead Accountant, Business Partnering,	Finance	09/11/22	16/11/22
Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	09/11/22	14/11/22
Andrew Walster	Director of Street Scene and Regulatory Services	-	09/11/22	11/11/22
Councillor D Welsh	Cabinet Member for Housing and Communities	-	15/11/22	22/11/22



# Coventry City Council

## Tall Buildings Design Guide & Three Spires View Management Framework

Supplementary Planning Document (SPD)  
(Consultation Draft June 2022)

**Contents Page**

1. Introduction
2. Policy context
3. Pre-application advice
4. Environmental Impact Assessment
5. Definition of tall building
6. Assessment of tall building proposals
7. Three Spires View Management Framework



## 1.0 Introduction

- 1.1 This Supplementary Planning Document (SPD) has been produced in conjunction with an updated View Management Framework which informs and supports the SPD and is also available through the city council's website.
- 1.2 This document has been written in response to a noticeable increase in the number of planning applications for tall buildings in the city of Coventry. This rise in applications locally reflects a wider national interest in tall buildings and wider market forces including that of the significant student market in the context of two nationally significant campuses of Coventry and Warwick universities. The SPD is intended to enable the Local Planning Authority (LPA) to provide a clear and well considered response to proposals for tall buildings and to ensure that the development of tall buildings occurs in the most appropriate parts of the city with necessary sensitivities to the city's notable heritage assets.
- 1.3 The document is divided into two parts, the first providing a clear set of criteria which the LPA will expect any applicant to address when bringing forward proposals for tall buildings. The principal objective of the criteria is to secure tall buildings of the highest possible design quality.
- 1.4 The second part of the document identifies notable view cones to the cities iconic three spires. Retaining these views, and the spires primacy in the city centre skyline, is a key consideration in any application for tall buildings in and around the city centre.

## 2.0 Policy Context

- 2.1 The National Planning Policy Framework (NPPF) sets out the government's objectives for new development. Whilst the NPPF does not have any specific policies on tall buildings or view cones, it does set out a number of more general design and planning principles which run throughout the document and which are relevant to the development of tall buildings and the management of view cones.
- 2.2 Good design is a key requirement of the NPPF. The NPPF states that it is important to plan positively to achieve high quality and inclusive design and that local authorities should develop robust and comprehensive policies that set out the quality of development that will be expected in their area. These should be based on a clear vision for the future of the area and upon a detailed evaluation of the characteristics that define it. The NPPF promotes an urban design led approach to planning that requires buildings to respond to the location in which they are located rather than prescribe specific architectural styles.
- 2.3 Planning policies are required to ensure that new development will:
- Function well and add to the quality of the area;
  - Establish a strong sense of place, using streetscapes and buildings to create attractive places to live;
  - Make the most of the potential of the site;
  - Respond to local character, history and identity;
  - Create safe and accessible environments;
  - Are visually attractive;
  - Respond well to heritage assets and their setting;
  - Respond to the views of local people;
  - Make effective use of land and make use of brownfield land as much as possible;
  - Encourage multiple benefits from land, in terms of development and net environmental gains, and;
  - Support opportunities for upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties.
- 2.4 The NPPF makes a presumption in favour of sustainable development and states that buildings which generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes maximised. The NPPF states that great weight should be given to outstanding and innovative designs which promote high levels of sustainability as long as they respond to their context in terms of form and layout.
- 2.5 Section 12 of the NPPF discusses the need to achieve well designed places. The National Design Guide was published by central Government in October 2019 to illustrate how well-designed places can be delivered in practice. The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The

National Design Guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools

2.6 A core element of the Guide is that it sets out the Government's priorities for well-designed places in the form of ten characteristics:

- Context - enhances the surroundings.
- Identity - attractive and distinctive.
- Built form – a coherent pattern of development.
- Movement – accessible and easy to move around.
- Nature – enhanced and optimised.
- Public spaces – safe, social and inclusive uses – mixed and integrated.
- Homes and buildings – functional, healthy and sustainable.
- Resources – efficient and resilient.
- Lifespan – made to last.

2.7 The Council wants to significantly raise the standard of design in the built and green environments, as good design assists in the creation of sustainable and inclusive communities and can improve the quality of people's lives. Furthermore, good design can help to reduce environmental inequalities.

2.8 The Coventry Local Plan 2017 establishes the policy basis for determining development proposals across the city. This SPD should not be considered in isolation from relevant Local Plan policies relating to infrastructure, transport, sustainability and conservation, or any other policies that may be relevant to a specific proposal or site. Whilst all policies should be considered in the round, Local Plan Policy DE1: *Ensuring High Quality Design* is a key policy in relation to the design and layout of new developments. The policy sets out criteria which should be satisfied in order to create high quality developments, improve the quality of people's lives and sustainable and inclusive communities.

2.9 As well as policies contained within the Coventry Local Plan 2017, the City Centre is also subject to specific policies designed to ensure appropriate developments are managed in an appropriate way. The City Centre Area Action Plan 2017 provides additional policy and guidance for those seeking to development tall buildings and any development which may affect view cones.

2.10 Safety and security measures in the design of tall buildings are also a key design requirement and proposals should fully consider requirements, as established in the NPPF at paragraphs 92, 97 and 130.

#### 2.11 Policy CC7: Tall Buildings:

The location of proposed tall buildings will be considered in relation to the views of the cities three spires. New development should reflect these view cones and seek to enhance the key views identified on plan.

### Policy DE1 Ensuring High Quality Design

1. All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. All development will be expected to meet the following key principles:
  - a. respond to the physical context of the site;
  - b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;
  - c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;
  - d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
  - e. preserve or enhance the character and setting of major road, rail and canal corridors;
  - f. clearly define the boundaries between public and private spaces and enclosure of space;
  - g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
  - h. make places that inter-connect and are easy to move through;
  - i. ensure places are easily understood by users, with clear routes and distinct physical features;
  - j. seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
  - k. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
  - l. promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
  - m. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
  - n. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);
  - o. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;
  - p. minimise adverse impact on important natural resources;
  - q. conserve, restore or enhance biodiversity; and
  - r. respect and enhance landscape quality including trees, hedges and other landscape features of value.

Formatted: Left, Indent: First line: 0 cm, Right: 0 cm

### 3.0 Pre application advice

- 3.1 Prospective applicants and their agents should note that it will be strongly encouraged to engage in Pre-application discussions with the LPA for developments of tall buildings in the city.
- 3.2 In the context of the city's notable heritage assets, conservation and urban design specialisms will always be required to be consulted in Pre-application discussions for proposals of tall buildings.
- 3.3 In order to deliver fully informed Pre-application advice, applicants are encouraged to prepare townscape visual impact assessments to accompany Pre-application submissions, referencing and identifying key views where proposals may be impactful.
- 3.4 Outline planning applications for tall buildings are strongly discouraged, as it is seen by the LPA that such proposals require significant detail in order to provide a fully informed position of acceptability.

### 4.0 Environmental Impact Assessment

- 4.1 Applicants and their agents should also note that an Environmental Impact Assessment (EIA) may be required as part of the application process. Potential developers may wish to seek an EIA screening opinion from the Local Planning Authority as part of any pre application discussion.
- 4.2 It should also be noted that an 'Appropriate Assessment' (AA) – under the Conservation Natural Habitat Regulations 1994 - of a proposed tall building may also be required in addition to an EIA in those areas which are near a nature conservation site.

### 5.0 Definition of a tall building

- 5.1 In the context of Coventry, a city characterised by large areas of low rise two storey housing within a predominantly flat landscape, it is considered both necessary and useful to define a tall building. A tall building is therefore considered to be:
- any building above 5 storeys in height (i.e. 6 storeys or more in height from ground level) or;
  - any building of 20m or above in height (inclusive of rooftop plant)
- 5.2 Any proposal for a building, which is equal to or exceeds either of the storey/height thresholds, will trigger this SPD. This SPD may also be triggered by extensions, and/or the addition of plant or machinery and any other structural projections to existing tall buildings which take the height of the building inclusive of any plant above 20m or 5 storeys in height.
- 5.3 The height thresholds apply in all instances, irrespective of whether an application for a tall building is being made within the city.

### 6.0 Assessment of tall building proposals

- 6.1 In order to facilitate and encourage the design of tall buildings of the highest quality, the LPA has identified the following principles or criteria which any successful tall building should address. It should be noted that the LPA will be seeking a satisfactory response to all of these criteria. If the applicant fails to provide the relevant information, the LPA may be unable to determine the application.
- 6.2 In order to assess the suitability of proposals for new or replacement tall buildings, the applicant will be required to submit a Tall Buildings Statement.
- 6.3 This statement would be required in addition to a Design and Access Statement, and there may be some overlap between the two documents. It would also be a requirement of the criteria by which the LPA validate applications. The statement should clearly indicate how the proposal responds to the criteria/points identified below.
- 6.4 It should be noted that the requirement for the submission of a tall buildings statement applies not only to new or replacement tall buildings, but also to those situations in which the addition of an extension, or of plant/machinery and/or any other structural projections to an existing building which would take its height above 20m or 5 storeys.

### Visual Impact

6.5 Applications should contain:

- Accurate visualisations which illustrate the impact of the proposal from both its immediate context and the wider urban context,
- Where appropriate, and guided by Pre-application advice, Townscape Visual Impact Assessments (TVIAs) in line with the Guidelines for Landscape and Visual Impact Assessment published by the Landscape Institute which illustrate the impact of the proposal upon longer distance important views and vistas, and, wherever applicable, or city centre view cones as identified within section two of this document,
- An urban design analysis of the surrounding area that clearly outlines the positive and negative visual impact that the proposal would make, the taller the building and the more sensitive its location, the more extensive and detailed the analysis should be.

6.6 It is essential that all illustrations provided in support of the application must be accurate, of a high quality, and capable of being easily understood. They must not seek to minimise any real or perceived negative impacts of the proposal, and as such must not deliberately misrepresent the height, scale, mass, form or architectural detail of the proposal.

6.7 An effective means of ensuring accuracy (particularly if the images are computer generated) is to base three dimensional images on the plans submitted in support of the application.

6.8 The applicant should contact the LPA for further advice regarding the nature and number of images that it is considered appropriate to provide.

### Siting

6.9 Applications should:

- demonstrate by means of accurate visual representation and supporting information how the proposal sits within the townscape; and
- describe where appropriate how the proposal would contribute to the creation of a 'cluster' of tall buildings or would contribute to an existing cluster.

6.10 Groups of tall buildings should ideally be staggered or graduated to help create a richness in townscape and emphasise the buildings at the core of the cluster. They should not block significant views or vistas within, into or out of the city.

### Height

6.11 Applications should:

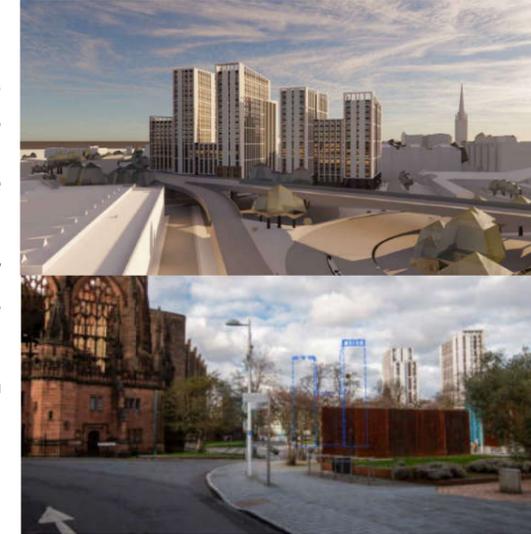
- provide a justification of the height of any proposed new tall building; and
- seek to ensure that lift transmission equipment, air conditioning units and other plant and equipment are addressed as an integral part of the initial design of a tall building.

6.12 Whilst this document clearly indicates the minimum height at which a building could be considered tall within the context of Coventry, it does not suggest a maximum height. This should not, however, be read as an indication that any height will be acceptable. All buildings have a reasonable limit, which relates to their context, surroundings and impact on the surrounding townscape and skyline.

6.13 Applicants should seek to moderate their aspirations towards excessive heights for tall buildings and will always be required to give a thorough and well-reasoned justification for the height of any proposal. It should also be noted that in terms of massing and form a proposal will always have an optimal height in relation to its width, depth and footprint.

6.14 Plant and other equipment which is added later in the design process, or as a 'bolt on' for the purposes of expediency can significantly add to the height of a tall building and have a detrimental impact on their overall design. Such additions/equipment should always be considered as an integral part of the initial design and not as a later addition.

**6.15 Applicants should be aware that developments proposed in excess of 50m height above ground level, should undergo consultation with the Ministry of Defence**



*Images above: Good examples of detailed and wireframe TVIA imagery to assess proposals*



*Image above: Good example of plant screening integrated into roof design*

### Effect on local views

6.165 Applications should illustrate the impact of any proposal on any local views or vistas.

6.176 Foremost in this consideration are the identified view cones toward the cities iconic three spires identified within the Coventry View Management Framework; these are referred to as follows:

- View cone one – Foleshill Road
- View cone two - Stoney Stanton Road
- View cone three - Swanswell Pool
- View cone four - Sky Blue Way
- View cone five - Far Gosford Street
- View cone six - London Road
- View cone seven – Parkside
- View cone eight - Mile Lane
- View cone nine - Mile Lane (Christchurch)
- View cone ten - Quinton Road
- View cone eleven - Manor Road Footbridge and Friars Road
- View cone twelve - Spencer Park & Footbridge
- View cone thirteen - The Butts
- *View cone fourteen – (now incorporated into view come thirteen)*
- View cone fifteen - Holyhead Road
- View cone sixteen - Upper Hill Street and Footbridge
- View cone seventeen - St. Nicholas Street

6.187 The omission of a viewpoint from this list should also not be taken as an indication that they are not considered significant or sensitive. The impact on views and vistas generally should always be given extremely careful and sensitive consideration irrespective of the location and setting of any proposed tall building. Imagery and analysis of each of the above identified view cones can be found in section two of this document.

### Alignment

6.198 Applications should:

- indicate how the proposal responds in a positive way to the alignment and set back of surrounding buildings, and
- illustrate the effect of the alignment of the building on local views or vistas of importance or significance.

6.2019 The alignment of a new tall building should be a site-specific response to the context and surroundings of the area. In certain contexts, it may be appropriate to align a building in a manner which provides a stop to a visual axis or frames a particular view or scene.

### Mass

6.210 Applications should:

- describe how the massing of the proposal relates to surrounding development; and
- illustrate how the massing of the proposal has been derived, and how it creates a form which is contextually appropriate.

6.224 New tall buildings should have regard to the massing and form of other buildings in the surrounding area. Great effort should be made to ensure that the design of new tall buildings is neither bulky nor over dominant.

### Scale

6.232 Applications should:

- describe the rationale for the scale of the building within its context; and
- describe how the design of the building and spaces proposed around, relate to human scale at ground level.

6.243 Scale is another essential ingredient in the integration of proposed tall building into their surroundings. Generally speaking, they should respond to the building heights, depths and articulation of surrounding buildings.



Formatted: Font: Bold, Font color: Blue

Image above: Extract from View Management Framework articulating prescribed viewcone locations



Image: The lower podium establishes a human scale to the base of the development (above)



Canopy introduces secondary scale (left)

Formatted: Right: 10.92 cm

### Form

6.254 Applications should:

- provide a rationale for the form of the building, 'why does it have the form it does?'
- in the case of 'landmark' buildings, the rationale should consider:
  - The inspiration for the form of the building;
  - The silhouette it would create
  - Considerations of the important role of lighting in proposals for tall buildings
- the applicant should also describe and illustrate how the form of the upper part of the building would enhance the skyline of the city.

6.265 Form is one of the key factors which influence the quality of any proposed tall building. It is essential for the creation of an elegant, well-proportioned and aesthetically pleasing building.

6.276 The form of any proposal will be influenced by its proposed location, use, status and architectural context. In all instances, a proposed new tall building should seek to make a positive and elegant contribution to townscape.

### Urban Grain

6.27 Applications should describe how the proposal complements and contrasts with the surrounding urban grain or pattern of the area

6.298 All new tall buildings should consider how they sit within the existing urban rhythms, architectural language, and historic setting and precedents of the area. It is essential that they make a positive contribution to their surroundings through an appropriate form, setback, massing and architectural language.

6.3029 This can be achieved through a number of ways; articulation of the lower floors to reflect the surrounding streetscape, the setback of the upper floors to give continuity to the height of a proposed tall building with adjacent buildings in the streetscape, and through the use of materials that either complement or positively contrast with those on surrounding buildings. These measures should help to ensure that the streets around the building remain at a human scale.

### Streetscape

6.319 Applications should indicate how the proposal contributes to the streetscape. Areas required to be articulated within the submission include :

- active frontages
- natural surveillance
- legible entrances
- clear definition of the public realm

6.324 New tall buildings should respond to and seek to have a positive impact on their surroundings. This can be achieved through the provision of active frontages, clearly legible entrances and a clear definition of public realm which reinforces the articulation of the surrounding streetscape. Applicants should seek to ensure that car parking is located within the development or behind the building and not at the front. Where this is not possible car parking should in all instances be in character with the surrounding streetscape well laid out and landscaped and provide an appropriate setting to the proposed tall building.

**Architectural Lighting**

6.332 Applications should, where appropriate give consideration to the incorporation of architectural lighting effects into any proposal for a tall building.

6.343 Architectural lighting has the ability to enhance the appearance of tall buildings and in situations where its use would not negatively impact on the amenity of nearby residents, consideration should be given to its use.

**Signage**

6.354 Applicants should, where appropriate give consideration to the incorporation of signage into any proposal for a tall building. The location of all signage should be given consideration at an early stage so that buildings can be designed to comfortably accommodate it rather than it having to be 'retro-fitted' at a later stage. All signage should follow the following criteria:

- Signage should be provided in a shared or complimentary material palette to that of the rest of the proposal
- Should represent a positive precedent of place/address not just branding to provide instinctive legibility
- Signage should be responsive of sightlines that play a wider townscape role
- Signage should not be over dominate to the architectural form
- Overt branding of the skyline will be resisted and expected not to challenge the iconography of the skyline

**Public Realm**

6.365 Applications should describe how the public space around the building has been designed to the highest quality; indicate how the proposal will where appropriate incorporate ground floor uses which encourage active use of the building throughout the day and evening; and, where appropriate provide a comprehensive scheme of quality external landscaping with associated maintenance plan.

6.376 Tall buildings are required to be designed in a way that creates safe and visually appealing environments around them. New spaces around tall buildings should be clearly defined and be activated by public uses with transparent facades at ground floor level. At a detailed design level, proposals should seek to create well oriented spaces that make a positive contribution to the quality and legibility of the wider public realm.

**Public Access**

6.387 Applications should explain how any proposal for a mixed use tall building will promote and encourage public access, not only at ground floor level, but also where appropriate at a height that would allow users a panoramic view or vista of the city and surrounding areas, allowing for enhanced appreciation opportunities of the city.

6.398 Public access to new tall buildings can promote their use at different times of the day, fostering a more positive perception of visitors to make effective use of it.

**Designing out Crime**

6.40 All design proposals should consider the legacy of the development and if a maintenance plan could be appropriate, particularly in communal areas to reduce the risk of crime in the short, medium, and longer term.

6.41 Any relevant counter terrorism standards applicable should be taken into full consideration.

6.42 All proposals should consider the guidance of Secure by Design standards



Images above: positive precedents of the incorporation of architectural lighting the building and allowing the community and

- Formatted: Font: Not Bold, Font color: Auto
- Formatted: Font: Not Bold, Font color: Auto
- Formatted: Indent: Left: 0 cm, Hanging: 1.27 cm
- Formatted: Font: Not Bold, Font color: Auto
- Formatted: Indent: First line: 0 cm
- Formatted: Font: Not Bold, Font color: Auto

### Climatic Impact

6.439 Applications should describe how the design of the building has had regard to its potential impact on the local climate; and explain how any proposal would seek to address the following climatic issues:

- high wind speeds at ground level
- heat islands
- glare
- overshadowing

6.440 Applicants/agents may also be called upon to consider the production of documentation regarding climatic effect of any proposed tall building as part of a comprehensive submission accompanying the application.

6.451 Depending on their height, location and design, tall buildings can have a severely adverse effect on the environmental quality of surrounding areas. Consideration should be given to the negative effects of the diversion and funnelling of wind, and the potential overshadowing of nearby residential properties and their gardens. The impact of shadowing throughout the day and at different times of year will need to be assessed. In all instances, consideration should be given to avoiding, minimising or mitigating through design or siting any elements of a proposal which could have a negative climatic impact on the surrounding area.

### Neighbourliness

6.462 Applications should analyse and describe the impact of proposals on neighbouring buildings.

6.473 The potential impact of a tall building on the amenities of surrounding residents is of particular importance when considering the impact of any proposed tall buildings. Issues that require careful assessment include:

- outlook/aspect;
- privacy
- daylight/sunlight;
- noise;
- light glare;
- overbearing impact;
- increased sense of enclosure

### Materials

6.483 Applications should provide comprehensive detail of the palette of materials they intend to use; and a justification of the appropriateness of the materials in relation to the character of the surrounding area and in terms of their durability and sustainability.

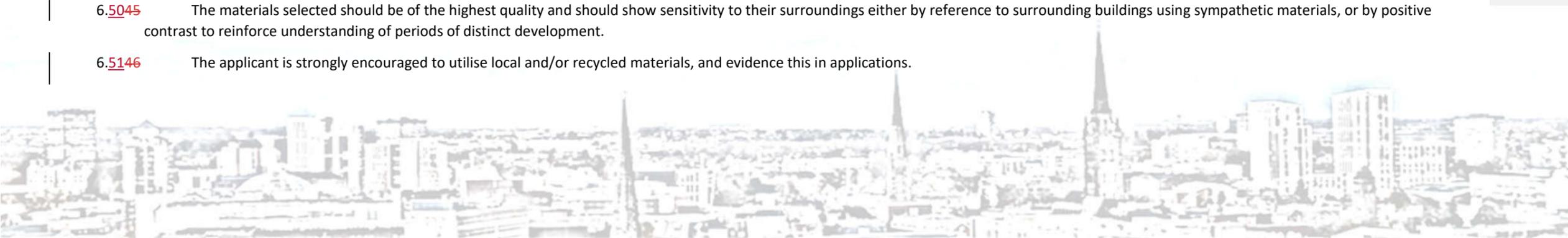
6.494 The materials specified for use on any new tall building are considered crucial to the overall impact that the building may have, crucial in buildings of high status through height, they can make the difference between a mediocre and a quality scheme.

6.5045 The materials selected should be of the highest quality and should show sensitivity to their surroundings either by reference to surrounding buildings using sympathetic materials, or by positive contrast to reinforce understanding of periods of distinct development.

6.5146 The applicant is strongly encouraged to utilise local and/or recycled materials, and evidence this in applications.



Image: Godiva Place



## 7.0 - Three Spires View Management Framework

- 12 Introduction
- 13 Assessment Principles
- 14 **View cone one** – Foleshill Road
- 15 **View cone two** - Stoney Stanton Road
- 16 **View cone three** - Swanswell Pool
- 17 **View cone four** - Sky Blue Way
- 18 **View cone five** - Far Gosford Street
- 19 **View cone six** - London Road
- 20 **View cone seven** - Parkside
- 21 **View cone eight** - Mile Lane
- 22 **View cone nine** - Mile Lane (Christchurch)
- 23 **View cone ten** - Quinton Road
- 24 **View cone eleven** - Manor Road Footbridge and Friars Road
- 25 **View cone twelve** - Spencer Park & Footbridge
- 26 **View cone thirteen** - The Butts
- 27 **View cone fourteen** – The Butts (superseded)
- 27 **View cone fifteen** - Holyhead Road
- 28 **View cone sixteen** - Upper Hill Street and Footbridge
- 29 **View cone seventeen** - St. Nicholas Street

**Introduction**

The View Management Framework takes forward the views of the Spires identified within the City Centre Action Plan (AAP), and undertakes an assessment of each ~~identified site which form each view cone, and outlines~~ outlining, through cross sections, an indicative constraint line required to retain positive appreciation of the spire views.~~guidance on the appropriate height which could be accommodated, whilst respecting and preserving important views toward the cities iconic three spires.~~

Formatted: Right: -1.08 cm

Whilst establishing the constraints in respect of the preservation of identified views, any proposal for new development will also be subject to assessments in respect of established local and national policy.

Formatted: Normal, Right: -1.08 cm, Space After: 8 pt, Line spacing: Multiple 1.08 li

The Spires of St. Michael, Holy Trinity & Christchurch have become synonymous with the image of the city, forming the iconic Three Spires Skyline. They are a majestic site on the skyline of the city and form an important link to the City's mediaeval past, therefore a crucial consideration of development in the city is the effect on setting and legibility of these iconic heritage assets.-

Formatted: Right: -1.08 cm

The notable post-war reconstruction and that of development in recent years, saw the rise of a number of tall buildings which joined the Spires on the skyline and whilst many of these buildings provided a sense of modernity & dynamism, some were detrimental to the setting and views of the Spires.

Given the importance of the Spires to the identity of Coventry it is important that any additional large/tall buildings are carefully and respectfully designed and located so as to ensure the spires retain their rightful prominent position on the city Skyline

**Identified Views of the Spires**

Further to updated analysis undertaken 2021 / 2022, this document identifies 16 views of the spires considered to be of high value. They are located on the edge of the city centre and, in the majority of the cases, are on key routes into the city centre offering strong and extended views of one or more of the spires.

Additionally, there are further, distant views from notable local centers such as Earlsdon and Coundon which should be considered, these areas provide a broader city centre view alongside the spires which assist in providing a sense of place and city wide legibility. Whilst these outlying views are not individually identified in this guidance, analysis of any outlying appreciable viewpoint to the spires should always be considered in design proposals.

The formally Identified views contained in this document are therefore as listed below and correspondingly indicated via 3D mapping adjacent:

- |                              |  |
|------------------------------|--|
| 9. Foleshill Road            | 1. Quinton Road                        |
| 10. Stoney Stanton Road      | 2. Manor Road Footbridge & Friars Road |
| 11. Swanswell Pool           | 3. Spencer Park & Footbridge           |
| 12. Sky Blue Way             | 4. The Butts                           |
| 13. Far Gosford Street       | 5. <i>The Butts (superseded)</i>       |
| 14. London Road              | 6. Upper Holyhead Road                 |
| 15. Parkside                 | 7. Upper Hill Street & Footbridge      |
| 16. Mile Lane                | 8. St. Nicholas Street                 |
| 17. Mile Lane (Christchurch) |  |

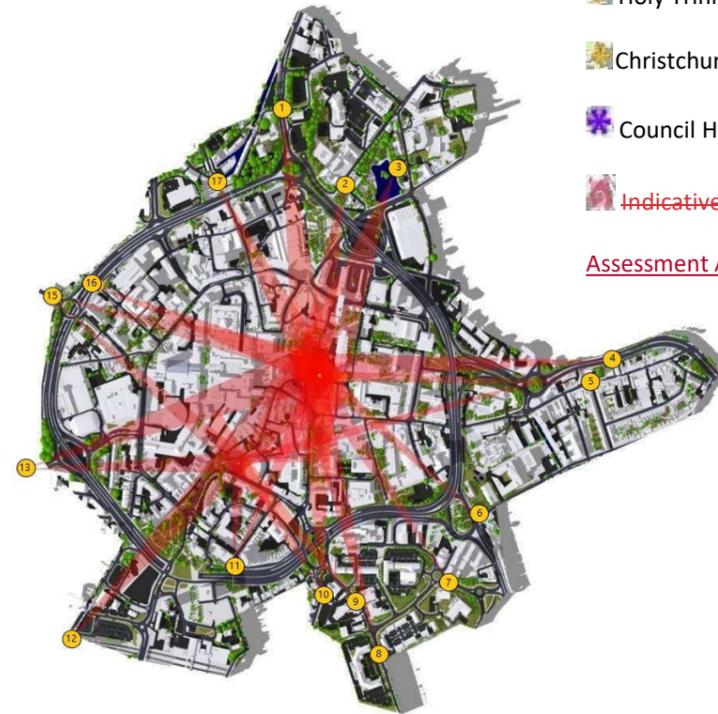
Each of these views has its own particular characteristics, but they are all dynamic in nature with the view of the spires (the number, proportion visible, and their location) changing considerably along the length of the views.

The Strength of these views depends on a number of factors; whether they are viewed on foot or in a vehicle; the time of day – the image of the spires changes dramatically from hours of daylight to night-time when they are lit by architectural lighting; the time of year – the spires become more visible on certain routes when the trees are not in leaf and; the weather conditions – the spires stand out boldly against a clear blue sky as opposed to overcast weather conditions.

**Tree Planting**

The view from Quinton Road illustrates the impact that tree planting can have on the views. The other views affected by tree planting are: Foleshill Rd, Swanswell Pool, The Butts, Stoney Stanton Rd, London Rd and Upper Holyhead Rd.

*Note - Viewpoints plotted over AAP area, note – foreground view cones annotated only for clarity, background impact should also be assessed as shown in individual view cone analysis*



**View Management Key**

Formatted: Right: 15.16 cm

View cone foregrounds

Formatted: Justified

View cone backgrounds

St Michaels Cathedral Spire

Holy Trinity Spire

Christchurch Spire

Council House Clock Tower

~~Indicative Development Areas – Plan~~

Assessment Area

Formatted: Right: 15.16 cm, Tab stops: 20.75 cm, Left

## Assessment Principles

### Modern City Centre Development

In some of the views, the spires have been infringed upon by modern development, whilst this can be seen to be to the detriment of the views now, it is feasible that redevelopment may take place which may open up new views, and in turn be material in consideration of redevelopment proposals.

The example image below of the view from Butts Road (B4101) which illustrates the improvement that the removal of Coventry Point has had on the view toward the spires. Whilst this view is modern and kinetic in nature, this new context to the viewpoint will therefore be informative of future development proposals.

The structure of the ring road also infringes on some of the views – as illustrated in the image below, the impact of the structure towards views of the spires is also evident in views from Swanswell Pool and London Road. The elevated Ring road is also present in the Sky Blue Way view corridor but it is less dominant in the foreground as it blends in against the university buildings which sit behind it.

### View Assessment

In support of the guidance outlined in this document, a visual assessment has been carried out for each view, identifying the primary points from where the spires are appreciable. Further to establishing this, a viewcone has been drawn for each view based on these points.

It is important to note that these viewpoint identifications do not preclude development taking place within them, rather they define potential height limitations on development in order to preserve the important townscape role that the views play. Therefore, each view assessment is accompanied by cross sections which give broad indications of the heights that *may* be achievable in a sensitive manner within the view cones and thus without infringing on the views, notwithstanding these suggestions, it will remain for any applicant to demonstrate impacts and officers to assess acceptability in each individual case. The sightlines within the cross sections are focused on specific features of the spires of St. Michael and Christchurch.



### View cone Background

This document identifies the best quality, currently available views of the three spires of Coventry, and whilst height capacity indications are noted in the foreground of these view points, it is important to note that background development can also have significant impact on setting and appreciation of skyline through the potential for ‘challenge of prominence’ in the city skyline, and erosion of clear space between in and around the spires, which plays an important role in the visual definition of the landmark. Proposals for development within the identified background settings of the spires will also therefore need to be substantiated by applicants and carefully assessed.

### Additional Views & Local Centres

The assessments undertaken in this document seek to highlight key views of the cities iconic three spires and ensure that any development potentially impactful on these viewpoints is fully considered and assessed in its impact. It is noted that additional views of the spires from those individually identified in this document are also present, notably from longer distance positions, applicants are therefore advised to always assess if proposals may be impactful. Notably of the longer distance views, are a number of appreciations of the spires available from distinct local centres, which provide a positive legibility of districts setting to the city centre, examples of this interface are shown below at the local centres of Earlsdon’s high street to the South of the city and Cramper’s Field in Coundon to the North West. These and other outlying views which deliver positive wider legibility of the city and its relationship to outlying districts should also be carefully assessed where development proposals may impact.



View cone 1: Foleshill Road

Foleshill Road offers a strong and evolving view of St. Michael and Holy Trinity, whilst Christchurch also becomes visible beyond. Although the photos are taken from the central embankment the views would be equally good from the pedestrian perspective, the North Western section of paving offers the longest view.

Upon Arrival at the roundabout St Michael and Holy Trinity come back into view as does Christchurch and the view develops to offer an excellent vista of not only the Spires but also the church rooflines, the Council House Clock Tower and the Blue Coat School and historic Priory Tower.

~~The cross-section provided below illustrates what levels of new height could be accomplished without infringing on this important view on arrival to the city centre from the North.~~  
~~The cross-section provided below illustrates the graduation of the view and plots a resultant constraint line in order that the view is maintained.~~

To assist ~~applicants and~~ assessors, the view cones has been bisected into ~~development assessment~~ areas A,B,C & D as noted in figure 1.3, these are also shown correspondingly in the cross section (fig 1.4) which suggests ~~the line of constraint in order to heights of development which may be achievable whilst retaining a~~ positive appreciation of the spires from this approach. The suggestions ~~of potential development height~~ is given as an indication only, and it is required by the applicant to demonstrate impact of any development within view cones irrespective of ~~suggested development capacity contained in~~ this guidance.

Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.



Fig 1.1

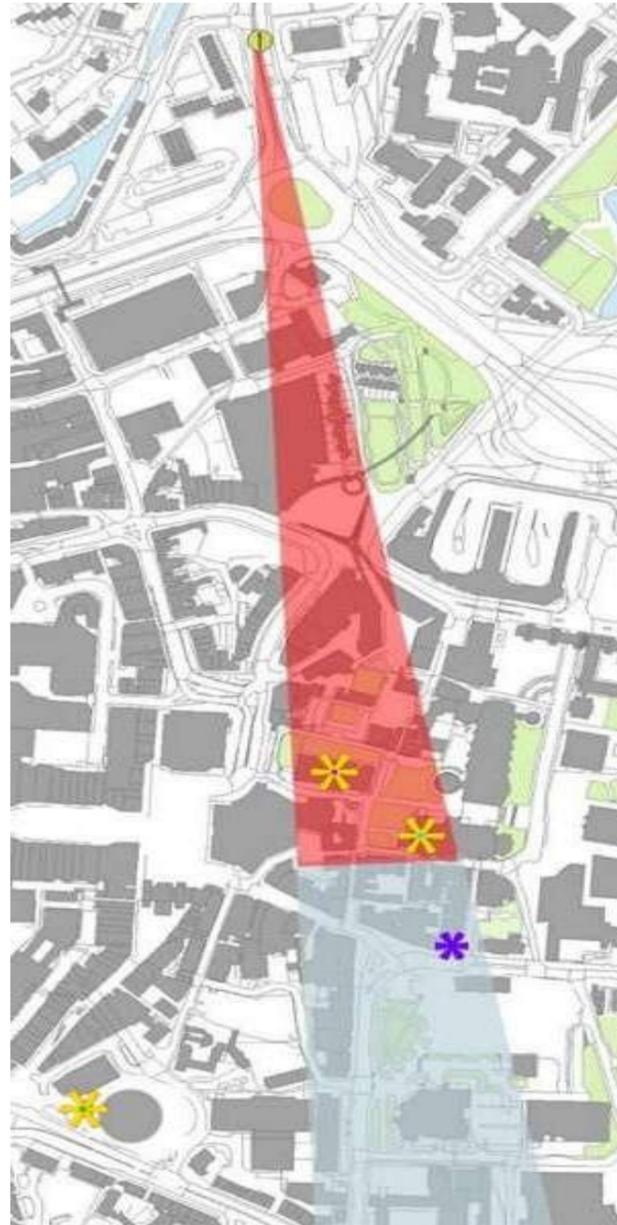


Fig 1.2

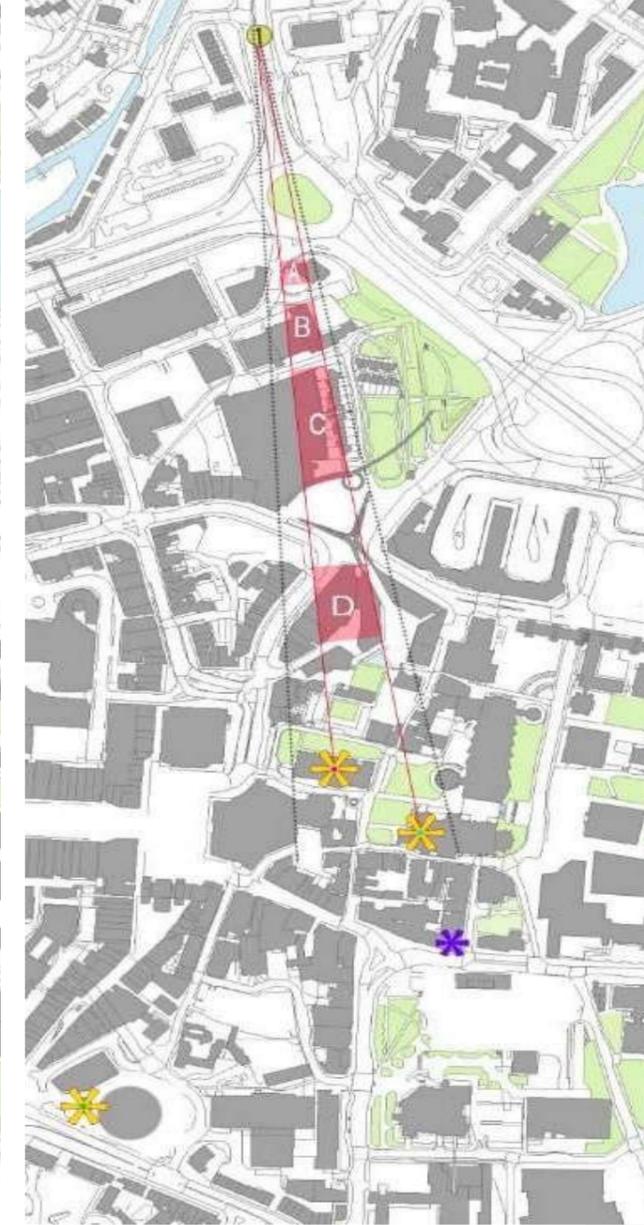


Fig 1.3

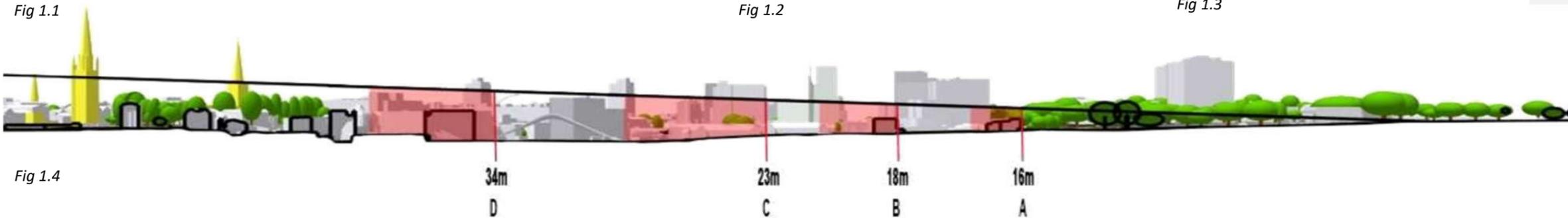


Fig 1.4

View cone 2: Stoney Stanton Road

The view down Stoney Stanton Road is limited due to the mature trees set around Swanswell Pool and along the road. Given this the Spires do not become visible until St. Mark's & here they are limited to views of St Michaels. Similarly to other views affected by mature trees, assessment of any proposals in this view cone should be undertaken both with and without the impacts of vegetation.

The Stoney Stanton Road view cone marks a positive location of appreciation of the spires set within a historic context of the Grade II listed Church of St Mark and the Grade II listed former nurses' home and outpatients' clinic, whilst viewed across the area of Lady Herbert's Garden and associated vegetation to the south west.

In defining guidance for any development proposed in the view cone, the area has been bisected into assessment areas A and B, as noted in figure 2.6, these are also shown correspondingly in the cross section (fig 2.7) which suggests heights the line of constraint to which may be achievable whilst retaining a positive appreciation of the spires. The suggestions of potential height is given as an indication only, and it is required by the applicant to demonstrate impact of any proposed development within view cones irrespective of indicative suggestions contained in this guidance.

Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.



Fig 2.1



Fig 2.2



Fig 2.3

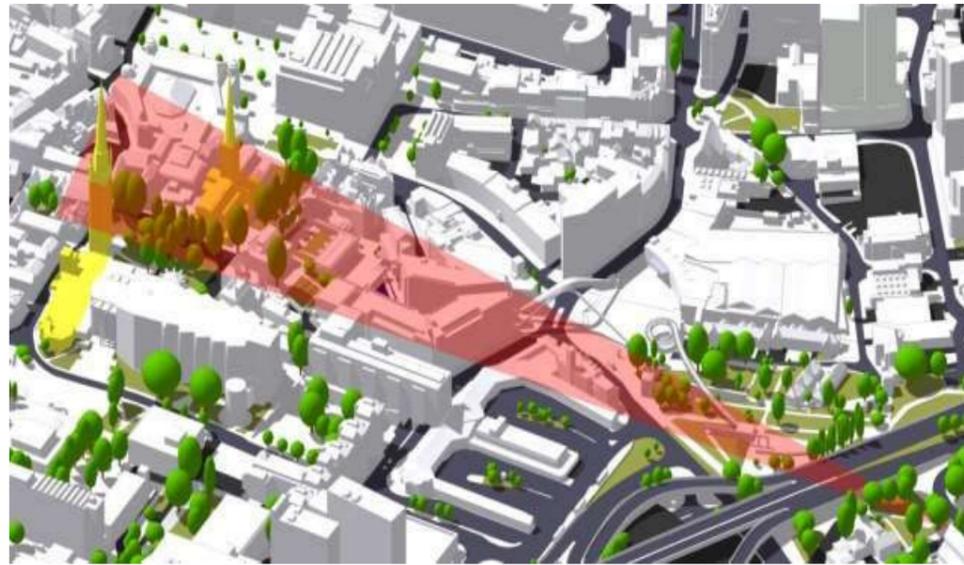


Fig 2.4

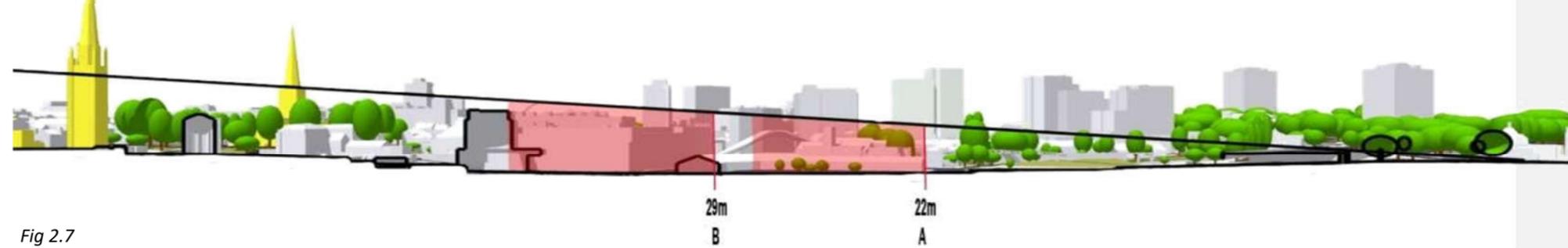


Fig 2.7

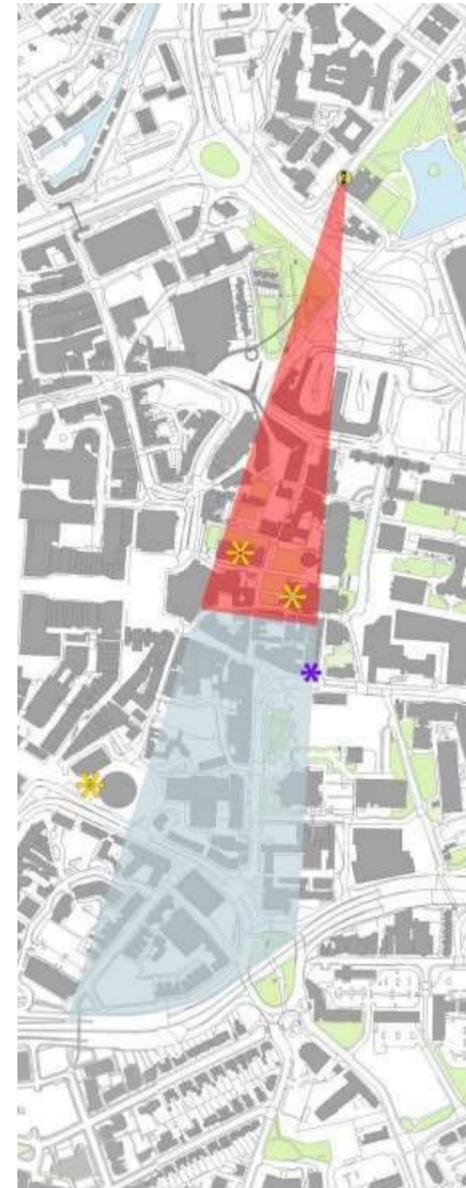


Fig 2.5



Fig 2.6

View cone 3: Swanswell Pool

Swanswell Pool offers an excellent view of St. Michaels and Holy Trinity particularly from the Northern portion of the park. This view is particularly important given that park users are likely to stop or sit and look back at the City Centre, the appreciation is therefore available for a longer time frame than those view cones identified on approach points to the city, and is experienced within a mature landscape setting. View cone 3 offers a high quality position of appreciation of the primary nature of the cities three spires over the modern skyline, with the spires of Trinity and St Michaels in the foreground, and Christchurch appreciable beyond.

Particularly of consideration upon any proposals in the North Eastern area of the city centre, the area has been bisected into assessment areas A,B, C & D as is noted in figure 3.3, these are also shown correspondingly in the cross section (fig 3.5) which suggests the line of constraint heights of development which may be achievable whilst retaining positive appreciation of the spires. The suggestions of potential heights are is given as an indication only, and it is required by the applicant to demonstrate impact of any proposal within view cones irrespective of indications contained in this guidance.

Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.



Fig 3.1

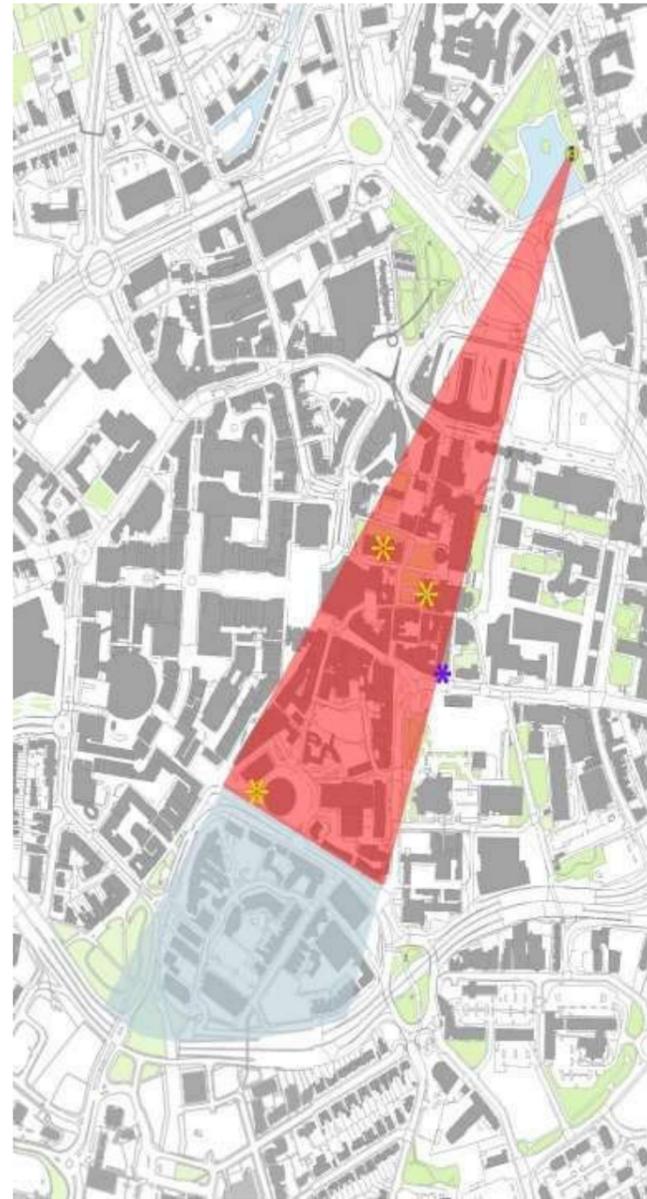


Fig 3.2

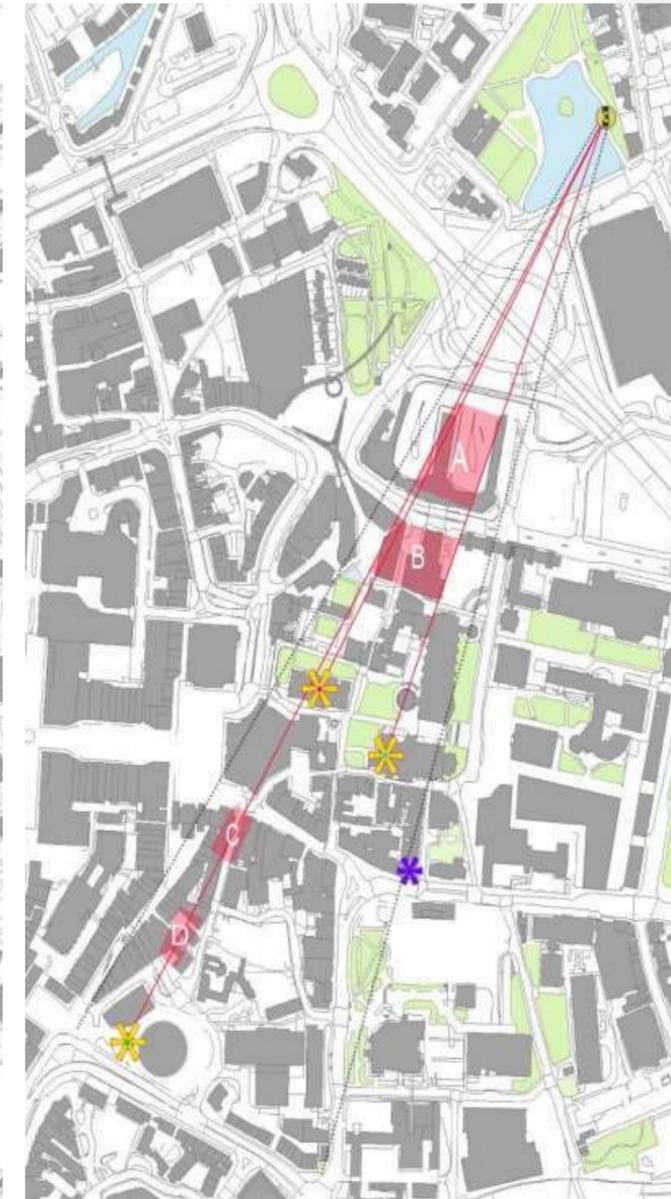


Fig 3.3



Fig 3.4

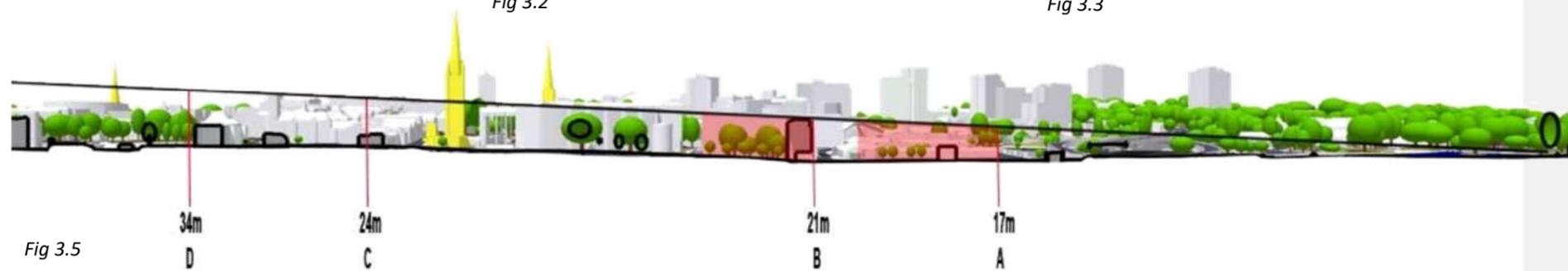


Fig 3.5

View cone 4: Sky Blue Way

Sky Blue Way offers possibly the most dynamic and evolving view of the Spires. St. Michael becomes visible from the junction of Walsgrave Road and Sky Blue Way with Holy Trinity coming into view adjacent to the junction of Oxford Street. The View remains relatively clear through to the Sky Blue Way Roundabout, thanks largely to the low rise development that surrounds the roundabout. There are also appreciable views of Christ Church particularly visible from the Northern side of the road offering road users long range views on the approach into the city.

Approaching the city from the East, Sky Blue Way forms a key axis of arrival for traffic into the city, whilst also being located aside the historic Far Gosford Street. Glimpsed views of the city's three spires are available on approach here, with the most defined being offered at the junction of Sky Blue Way and Oxford Street. At this identified location shown in mapping, the appreciation is that of two view cones, one towards the spire of St Michaels and Trinity church looking due west, and another toward Christchurch looking south west. Whilst the area between is not here defined as a view cone, development in such zones between will nevertheless be required to be considered, notably around assessment of principles of challenges of prominence in skyline.

Indicative Assessment zones A to D and E to I (fig 4.2) have been identified in the view cones with suggestions of the line of constraint to retain a positive appreciation of the spires. heights which may be able to be achieved without impeding upon appreciation of the spires. The suggestions of constraint potential development height are given as an indication only, and it is required by any applicant to demonstrate impact of any proposal within view cones irrespective of indications contained in this guidance. Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.

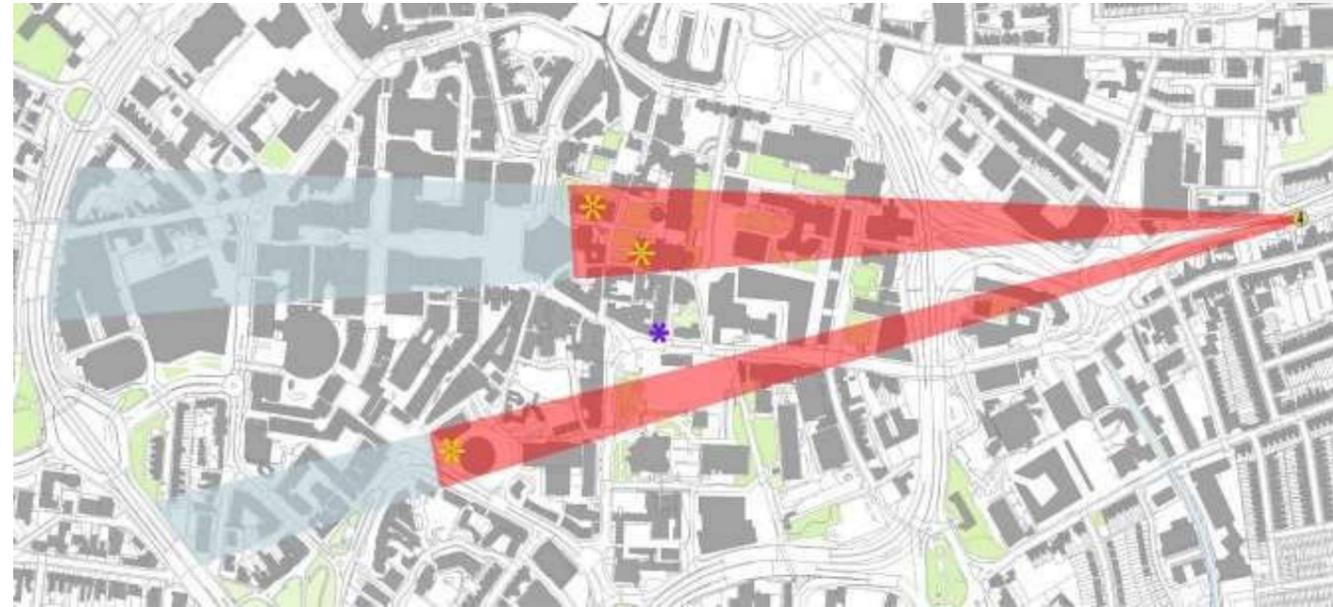


Fig 4.1

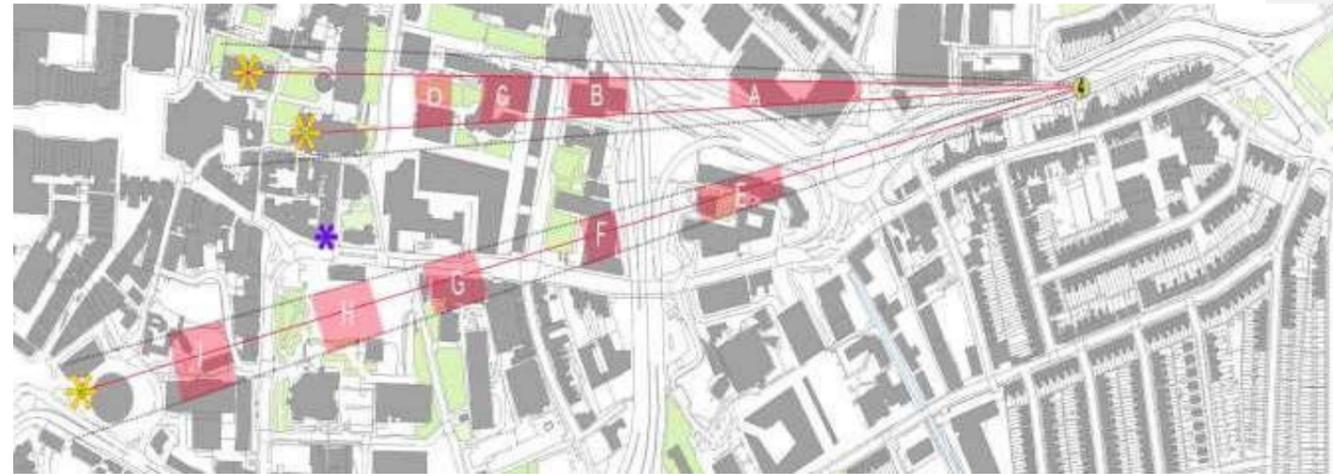


Fig 4.2



Fig 4.3

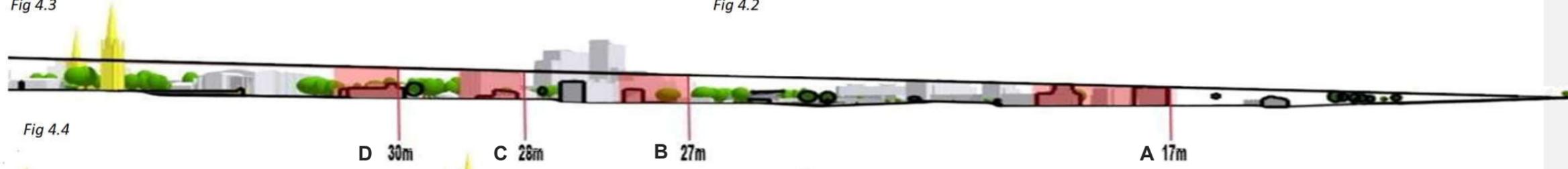


Fig 4.4

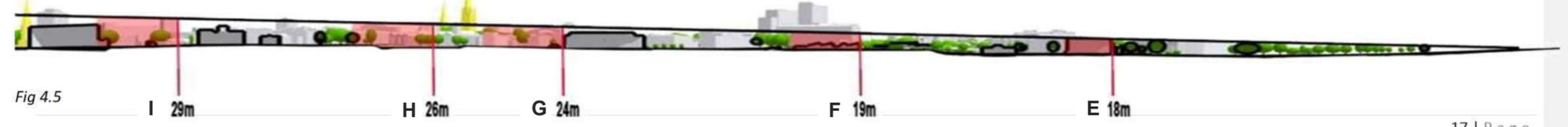


Fig 4.5

View cone 5: Far Gosford Street

Located to the West of the city centre, Far Gosford Street and associated conservation area includes a number of important heritage assets. Views towards the cities spires from this location are constrained, however a prime appreciable view of the spire of St Michaels is present around the junction of Bramble Street, playing an important townscape role of locating this distinct district in relationship to the centre of the city.

Set within the Far Gosford Street Conservation Area, around the junction with Bramble Street, this view cone offers a visual connection between two of the cities important heritage assets. Whilst the view is somewhat constrained, the spire of St Michael's is clearly legible in the skyline over historic properties and the protection of this visual link is of key importance in understanding of the conservation areas setting to the wider landscape of the city centre.

Although not appreciable from the identified viewpoint, the view cone contains a large area of highway infrastructure and therefore height indication assessment areas are limited around the indicative zones marked A and B (fig 5.2), set within the city ring road, the view cone therefore shows potential for height whilst retaining this important visual linkage to Far Gosford Street.

It is therefore stated that any development proposals in the viewcone should not be seen above the roofline of historic properties on Far Gosford Street in order to retain the view of the spire, and detailed analysis should be submitted with any proposals in order to ascertain this, whilst, as with all viewcone locations, any proposals set in the background will also need to be carefully considered in order to retain the spires primacy in the city skyline.



Fig 5.1

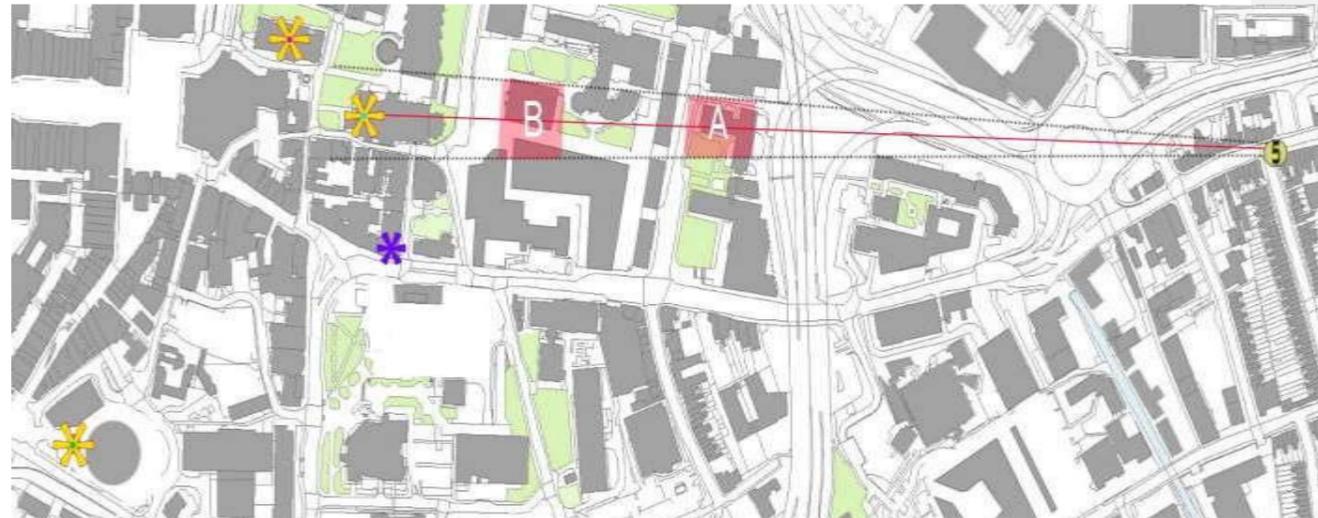


Fig 5.2



Fig 5.3

Fig 5.4

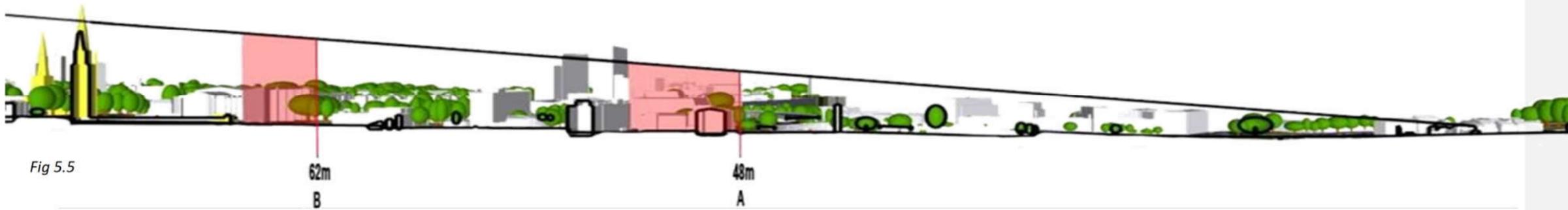


Fig 5.5

View cone 6: London Road

Although London Road is a key route into the city centre, the views it offers of St Michael and Holy Trinity are limited due to the flyover, street furniture and the mature vegetation at Junction Four of the ring road. This view cone is therefore most appreciable from the pedestrian perspective.

The St Michael Spire is the first available on this approach to the city becoming visible on the Eastern side of the road adjacent to No.63 London Road and is visible up to Whitefriars Monastery where it becomes masked by the flyover.

The Spires are most visible from the junction of Gulson Road with both St Michael and Holy Trinity being visible, although they remain partially masked by the Flyover and recent development within the City centre.

Approaching the city from the South East, London Road forms a key approach to the city, approaching aside key heritage assets of Charterhouse and the London Road Cemetery. Whilst the view of the spires of St Michaels and Trinity from this approach are heavily impacted both by modern development and highway infrastructure, the emergence of the spires to view delivers a strong sense of identity and legibility, marking the arrival into the area of the city centre.

A number of indicative assessment zones are shown in figure 6.2, marked A,B and C, with a constrain line established in figure 6.9 Indicative heights are then suggested in figure 6.9, however any proposal for development within or immediately adjacent to the identified view cone should be tested with impacts demonstrated by any applicant to enable thorough analysis of development impacts. Background impacts should always also be assessed and the zone of background sensitivity is identified in figure 6.1.



Fig 6.1

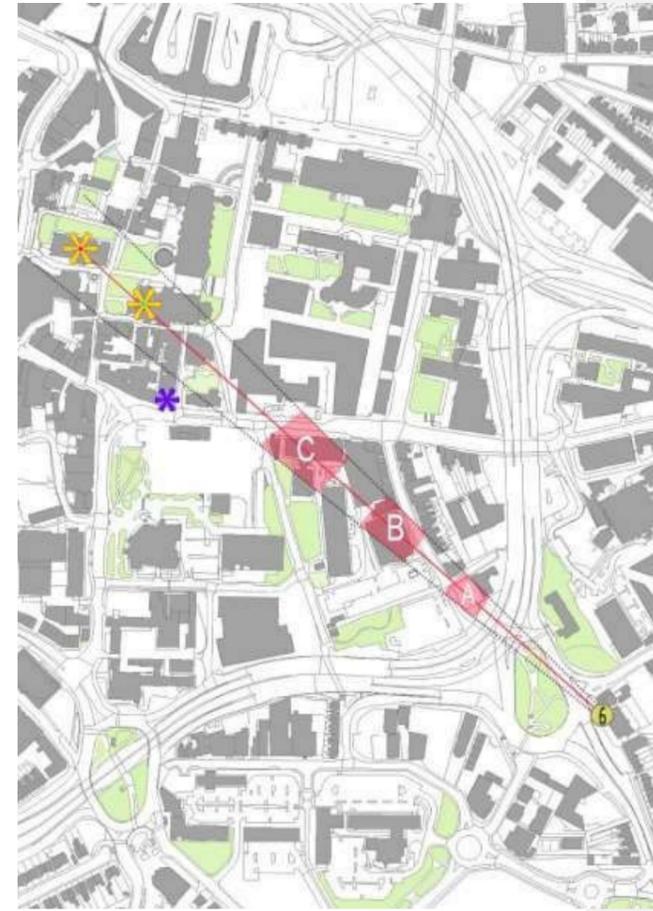


Fig 6.2



Fig 6.3



Fig 6.4



Fig 6.5



Fig 6.6



Fig 6.7



Fig 6.8

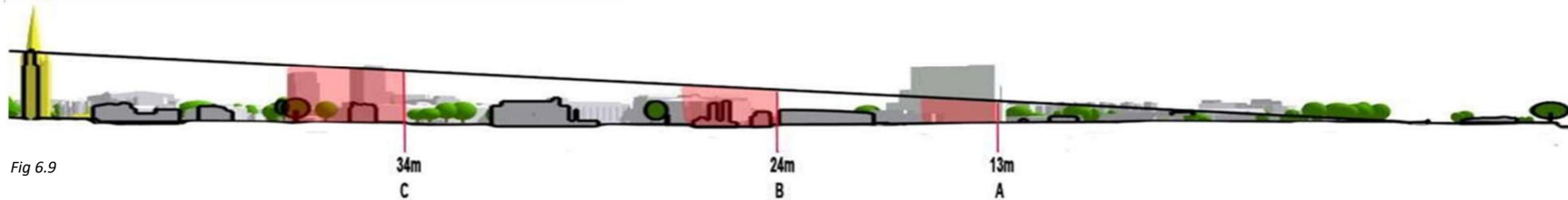


Fig 6.9

View cone 7: Parkside

Whilst this view is not a major route into the city centre, it is one of the main entrance points into the technology park and it offers a unique view of St. Michaels, Holy Trinity and the Council House clock tower. It also provides a strong visual link between the modern technology park and the historic city. At present the length of time the view is visible is relatively short being revealed on Deasy Road adjacent to the Feeder pillar on the southern side of the Road, with the best view being on the approach to the junction of the roundabout.

This view cone has an opportunity present to be improved upon with considered redevelopment of the sites that sit under the view cone – notably including light industrial units that sit in the foreground. If this area were to be redeveloped, it may be possible to enhance the view through the sensitive siting of new building footprints, the location of open space and through choosing soft landscaping that won't mature to infringe on the view – as is currently the case.

Elsewhere the view corridor passes over Whitefriars Gate and Buildings within the Civic Quarter. The cross-section provided shows a constraint line to ensure retention of positive appreciation of the spires from this viewpoint, that development within the Civic Quarter ranging from four to five storeys could be accommodated without infringing on the view. Any development, adjacent to Whitefriars Gate could comfortably accommodate in the region of two/three storeys.

In assessment of view cone 7 observed from Parkside, three indicative assessment areas are identified in the foreground as noted in fig 7.2, identified as assessment zones A,B and C. The foreground area of high sensitivity is shown red in fig 7.1 and any development within or immediately aside the view cone should be carefully assessed, and it should also be noted that any proposal which falls into or aside the area of background sensitivity (indicated blue in figure 7.1) should be considered alongside demonstrations of impact, to ensure appraisals can be made which preserve appreciation of the spires in the city skyline. An informative, indicative constraint line heights which may be achievable whilst preserving the appreciation of the spires are the view cone is indicated in the above section (fig 7.6) however notwithstanding this, demonstrations of impact will always need to be submitted and assessed, with architectural design, scale, height, massing and material finishes.



Fig 7.1



Fig 7.2



Fig 7.3



Fig 7.4



Fig 7.5

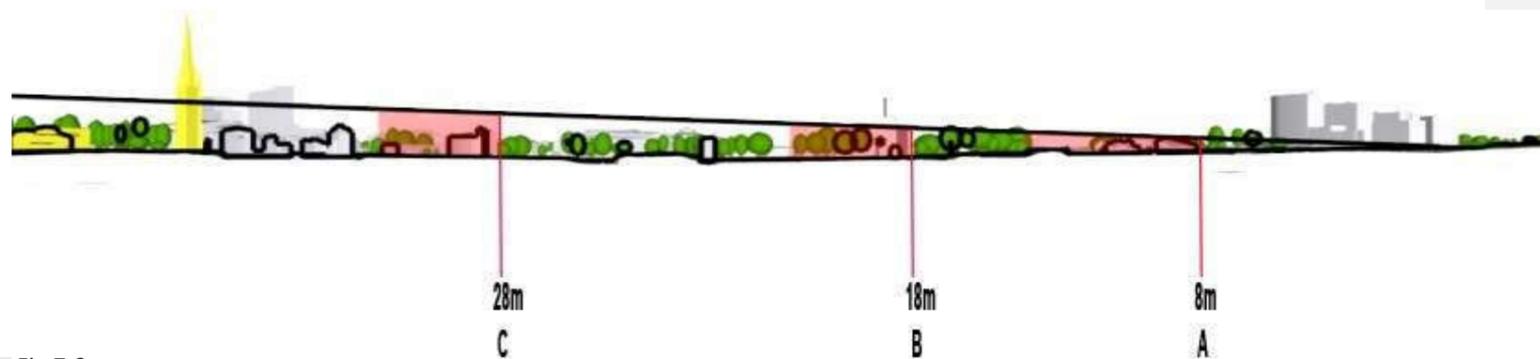


Fig 7.6

View cone 8: Mile Lane

Mill Lane offers a long and unfolding view of all three spires and the Council House clock tower. The spire of St Osburgs also becomes visible.

Western side of Mile Lane

From the point where Mile Lane bridges the railway, the Spires start to become visible. The view develops along the course of Mile Lane and is best between the crest of the hill and the junction of Merlin Road. From this point on, as the road runs down the hill curving left, the Spire of Holy Trinity gradually becomes less visible with the spire of St. Michaels disappearing from the centre of the Elm Bank Building. As the road bends to the left Christ Church Spire becomes visible up to the roundabout where it becomes masked by mature vegetation. Additionally St Michaels and Holy Trinity are masked beyond the Northern elevation of the Elm Bank Building by recent City Centre Developments, before coming back into view at the roundabout junction.

Eastern side of Mile Lane

This view is not as strong but it does offer a unique view of three spires along with St Osburgs as the road begins to bend to the left. Preservation of this view would be possible whilst still allowing development to take place within the viewcone as is suggested within the provided cross-section. Thanks to Mile Lane's elevated position development *could* take place within the Civic Quarter without infringing on the viewcone, whilst the careful siting of development on the remaining sites in Parkside that front Mile Lane would ensure the foreground remained clear and offers opportunities for framing as demonstrated with the Parkside development (fig 8.4).

Located close to the junction of Mile Lane and Merlin Close, the analysis has identified ~~four indicative height assessment~~ zones in the view cone foreground, these are indicated as A,B,C and D in figure 8.2. As with all identified views, impacts must also be assessed in the immediate adjacencies to view cones and also the background impacts. Two zones are identified outside of the ring road, whilst two are indicated within, which deliver a graduation ~~in potential availability of the height of development of constraint~~ whilst ~~indicating a retaining retention of the~~ appreciation of spires from this viewpoint. ~~Indications of height capacity are not prescriptive and proposals of any height should be demonstrated in impacts to allow fully informed assessment of proposals.~~



Fig 8.4



Fig 8.3



Fig 8.5

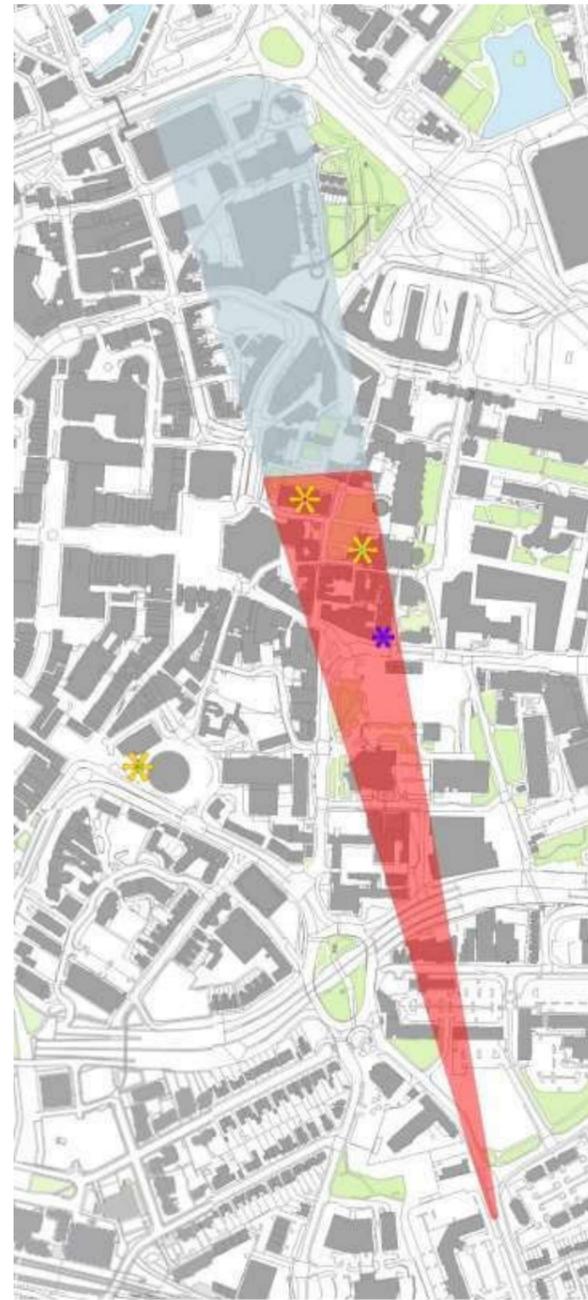


Fig 8.1

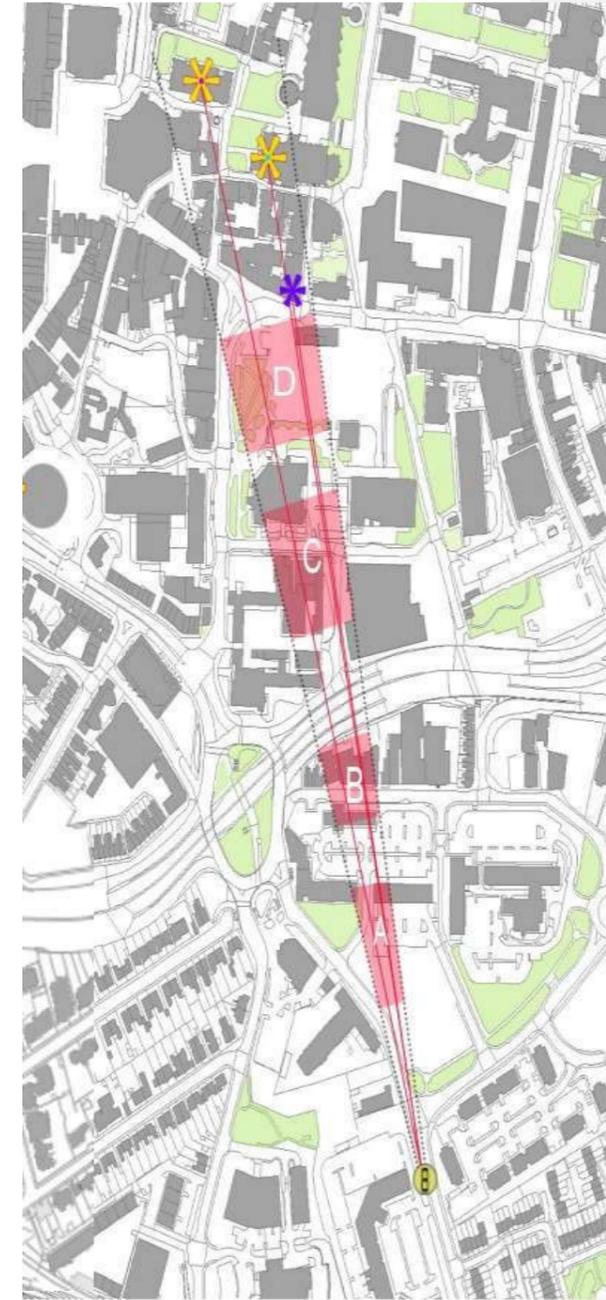


Fig 8.2

View cone 9: Mile Lane (Christ Church)

Moving northwest along Mile lane a second view cone appears with the spire of Christchurch becoming a dominant feature in the skyline as the road approaches the ring road junction 6.

Set aside the locally listed former Cheylesmore Council School and with the locally listed New Beeston works in the foreground, the view cone to Christchurch remains unimpeded by modern development and positive levels of appreciation of the asset, and also its positive contribution to townscape legibility are on offer.

This view cones also offers a demonstration of the importance of assessing background impacts, as seen in (fig 9.4), Mercia House is seen to the rear of Christchurch spire and as a result the primary nature of the spire in the skyline is compromised through the erosion of clear space surrounding. Similarly, the importance of materiality in background assessment is also demonstrated with the lighter materiality diminishing the impact and thus enabling the spire to remain distinct in the skyline

The foreground of the view cone is dominated by highway infrastructure and the large spaces seen around junction 6 of the ring road, therefore ~~indicative height assessment~~ zones in this view cone are shown as A and B in Fig 9.2, being inside the ring road. ~~Through a contribution of factors of topography and the distance from the primary view cone position, significant height could be achievable in these areas without undermining the appreciation of Christchurch spire.~~ Indicative suggestions of ~~the constraint line to retain positive appreciation of the spire is acceptable height in this regard are therefore~~ shown in the cross section below, ~~however these are only suggestions of potential, and a~~ Any proposal made within the view cones or immediately aside (inclusive of background zone) should provide evidence of impacts upon the view cone in order to fully inform of impacts.

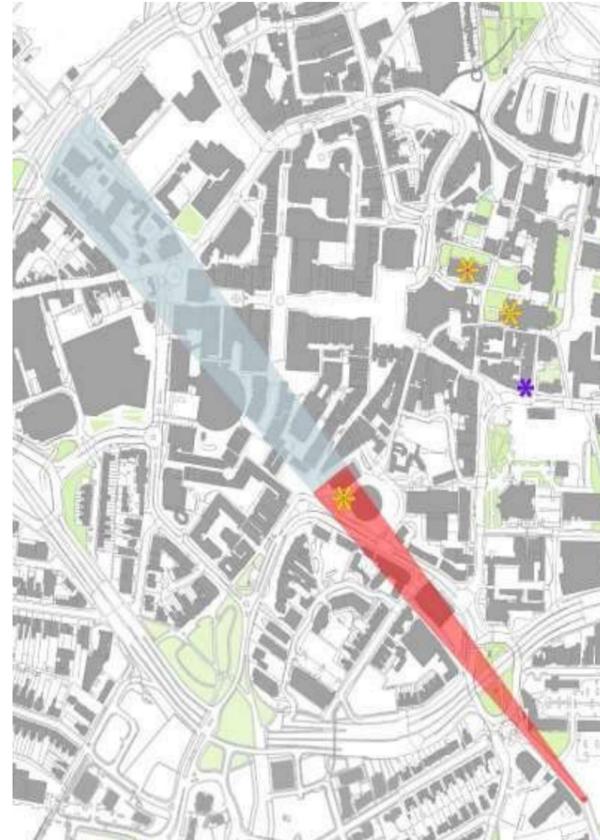


Fig 9.1

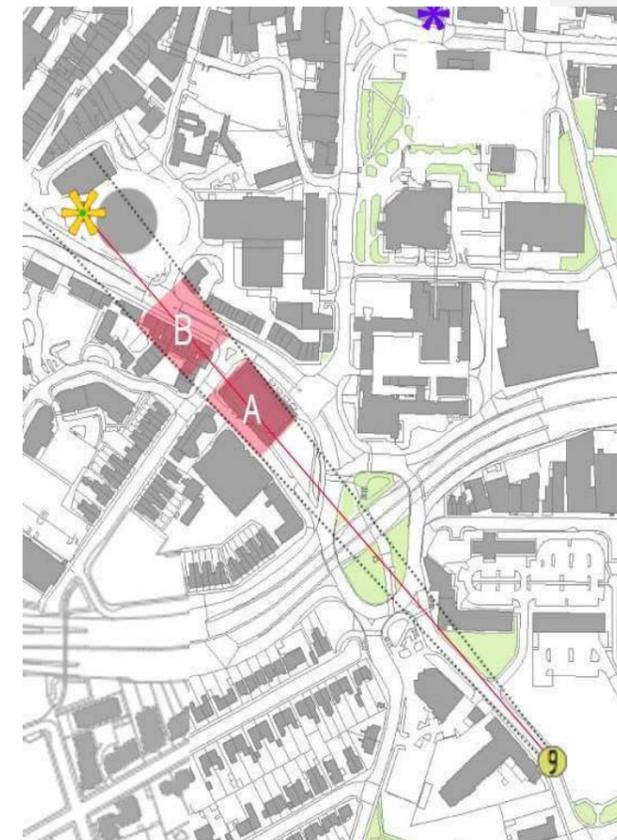


Fig 9.2



Fig 9.3



Fig 9.4



Fig 9.5



Fig 9.6



Fig 9.7

View cone 10: Quinton Road

The Quinton Road view is stronger in the winter when the trees are not in leaf. It offers a reasonable view of St. Michaels and Holy Trinity up to the ring road where a particularly strong vista opens up at the junction of Little Park and New Union Street. Due to the topography of this area with Quinton Road being only marginally higher than the land the spires, any development within the view cone would be required to be of lower level to retain this visual linkage, as is illustrated in fig 10.6 & 10.7

Similarly to view cone 9, much of the foreground is dominated by highways infrastructure and therefore indicative height assessment areas are noted only inside the ring road, and associated suggestions of the constrain line in order to development heights which may be achievable whilst protecting the view and is noted below.



Fig 10.3



Fig 10.1

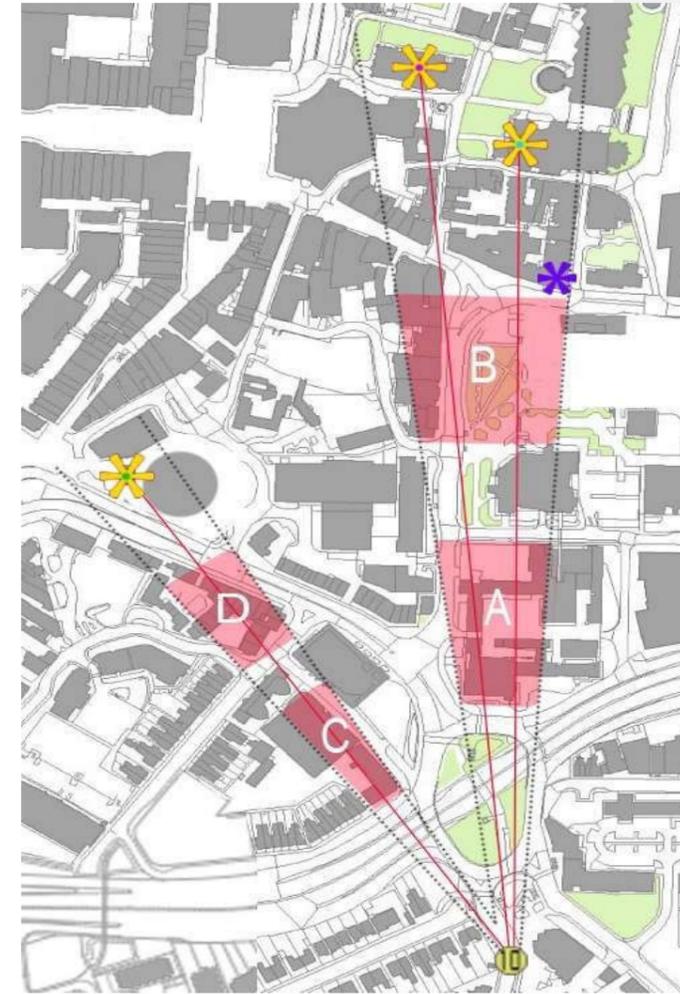


Fig 10.2



Fig 10.4



Fig 10.6



Fig 10.5

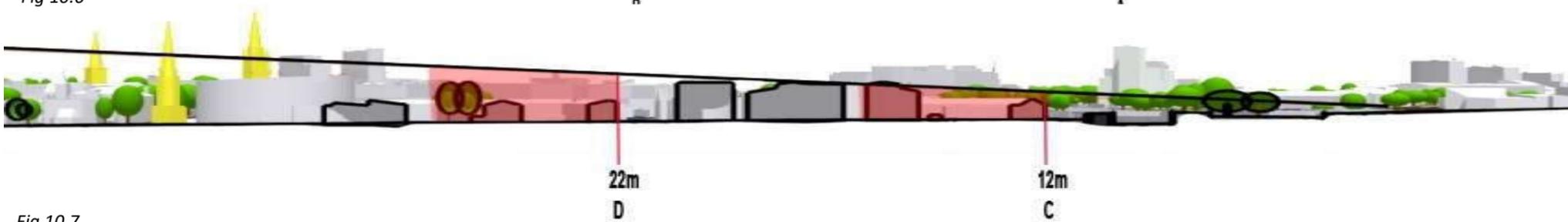


Fig 10.7

View Cone 11: Manors Road Footbridge & Friars Road

Whilst Manor Road Footbridge and Friars Road offer limited views of the tops of the Spires of Christchurch and St. Michaels, given the elevated position, the length of time the views are visible to user is reasonably good. The close proximity of the Spires means that much of their detail can be appreciated and they make for a pleasant contrast with the modern buildings in the foreground.

~~It may be possible to enhance the view of St. Michaels were the buildings to New Union Street and the BT Telephone Exchange to be redeveloped, but this should not come at the detriment of maintaining the city scale of the buildings to New Union Street.~~

Indicative height assessment areas are shown in fig 11.2 and correspondingly in sections below (fig 11.6 and fig 11.7) showing a graduation of height potential constraint whilst preserving appreciation of the spires from this viewpoint. Whilst the indicative constraint line is height which may be achievable is noted on the below sections, applicants should produce impact assessments when proposals are within, aside or in the background of identified view cones in order for impacts to be fully assessed.



Fig 11.3



Fig 11.1

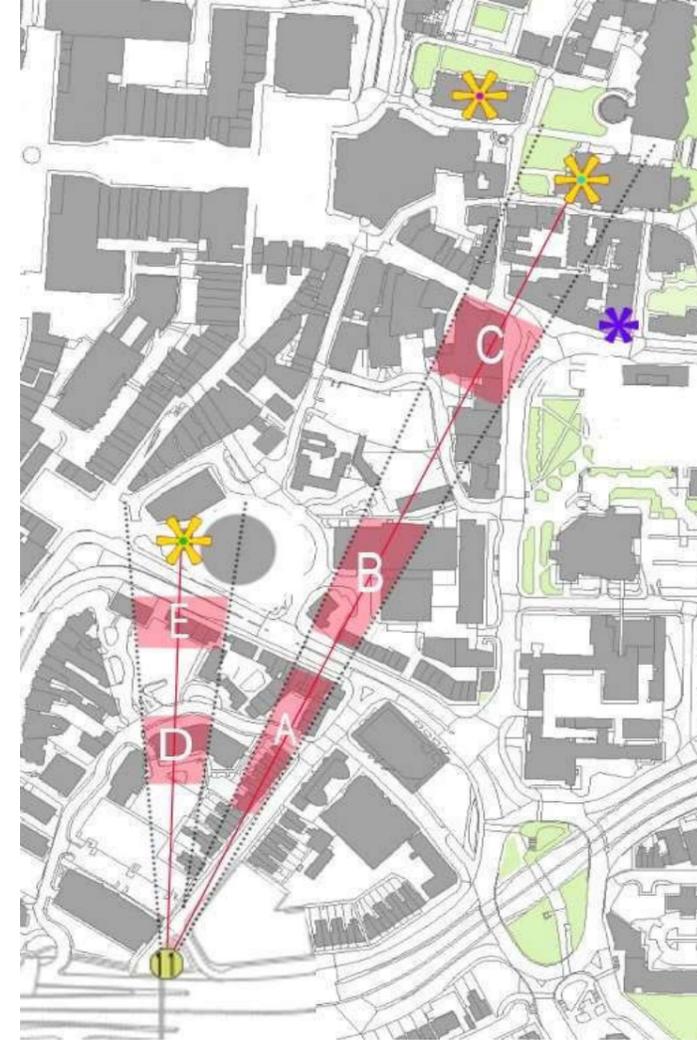


Fig 11.2



Fig 11.4



Fig 11.5



Fig 11.6

31m  
E  
18m  
D



Fig 11.7

29m  
C  
26m  
B  
24m  
A

View cone 12: Spencer Park & Footbridge

This is a Key pedestrian route into the city centre from the South and it offers one of the best views of the Three principle spires. The Spires become visible from the edge of the park and are clearly visible across the length of the Footbridge.

The view of the Spires disappears at the bottom of the Footbridge ramp as the view becomes obscured by mature vegetation. Given the height of the Footbridge it would be possible to preserve this view whilst still allowing development in the Viewcone as demonstrated with the provided cross-section.

This line of approach is notably historic, and in present day well trafficked via journeys from significant residential areas of the city to the south, the view cone from both the footbridge and appreciation from Spencer Park during times of lesser leaf cover, offers perhaps the foremost viewpoint in the city where the three spires are viewed together as an understandable group. The city skyline from this approach has developed a respectful 'bowing' in scale toward the spires, however some evidence of contradictions with this positive principle is also observed. Recent ~~large-scale~~ development on Fairfax Street also demonstrated the sensitivity of background impact consideration.

The elevated topography of Spencer Park and the footbridge may allow for ~~height~~ some change in the foreground whilst maintaining this important view of the iconic city spires, graduations of potential ~~heights~~ constraint are therefore indicated on the section below. As is the case in all identified view cones, applications sited within the view cones, both foreground and background, and also those immediately adjacent, should demonstrate levels of impact in order for robust assessment to take place and ensure preservation of this high-quality viewpoint.



Fig 12.3

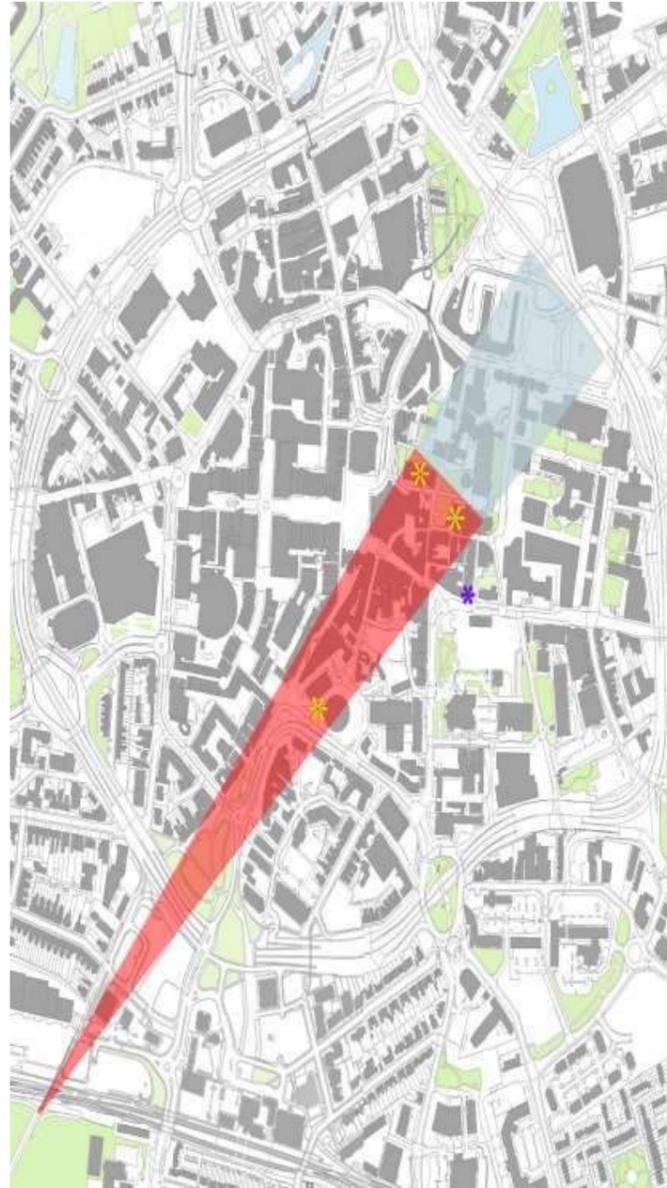


Fig 12.1



Fig 12.2



Fig 12.4

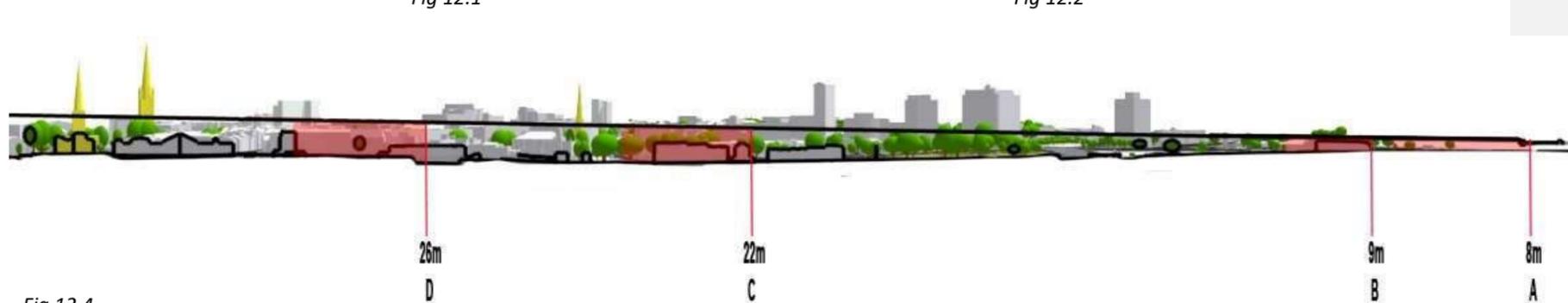


Fig 12.4

View cone 13: The Butts

The Butts is a Key route into the city centre and should offer a strong view of the Spires. This view was previously compromised by Coventry Point and currently now with its removal there is a clear view of St. Michaels and Holy Trinity that can be appreciated, with this view now appreciable, development should seek to retain the ability to appreciate the spires from this approach.

The view cone is both modern and kinetic in nature, unfolding on approach to the city as the highway sweeps toward the ring road junction and primarily visible from vehicular approach. The view cone towards the Cathedral and Holy Trinity is then also appreciable from pedestrian areas aside Croft road within the ring road. Given the kinetic nature of the view cone, a number of primary locations could be considered, however it is assessed that the location centrally in the highway of The Butts addressing vehicular approach which also covers the Croft Road approach, is the most representative location of this view as is therefore mapped as such in fig 13.1. Given the sweep of the highway however, the principle is that a-points of appreciation of all three spires should now be retained post the demolition of the formerly obscuring Coventry Point development.

Through assessment-examination of this newly appreciable view cone, a number of indicative height-assessment-areas are shown in fig 13.2, which seek to articulate potential height which may be accommodated the view cone constraint in order to whilst retaining the views toward the city spires, these suggestions are made only as guides and proposals should be assessed with detailed impact assessments in order to ensure impacts on views are able to be fully considered.



Fig 13.3



Fig 13.4



Fig 13.5



Fig 13.1

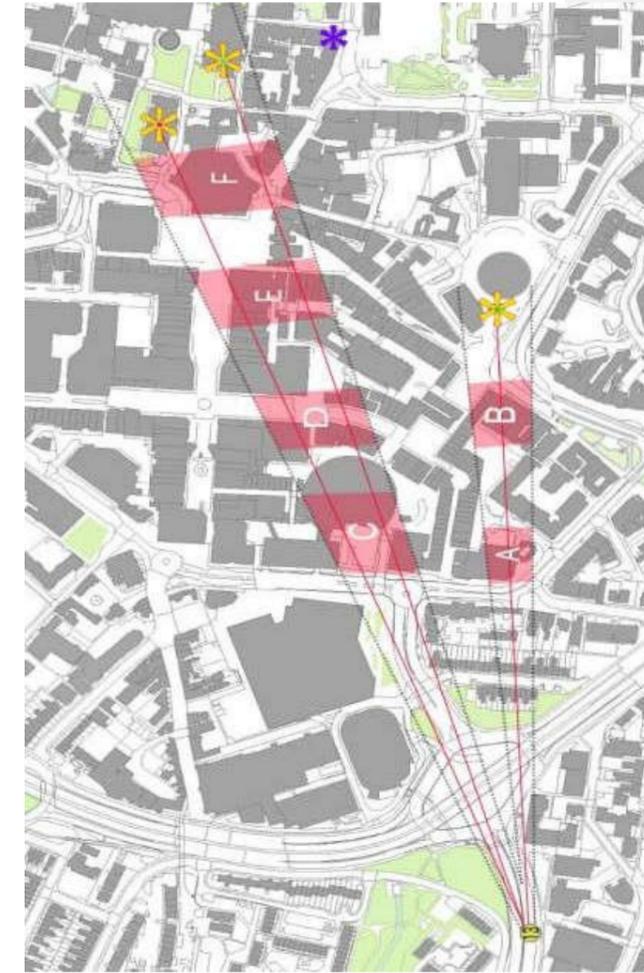


Fig 13.2



Fig 13.6

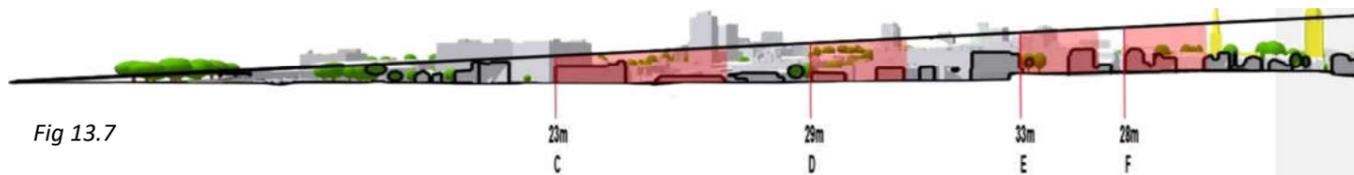


Fig 13.7

View cone 14: The Butts

Referenced within the AAP and now superseded within view management framework, viewcone 14 has now been incorporated into viewcone 13 in order to better articulate the primary points of appreciation of the Three Spires from the approach along the Butts.

View cone 15: Holyhead Road

Upper Holyhead Road offers a brief glimpse of St. Michaels, Holy Trinity and Christchurch as the view is largely obstructed by the mature vegetation on the ring road junctions roundabout, the view however in times of low leaf cover or should vegetation be removed in future, is a key availability upon arrival to the city from a primary approach.

The spires re-emerge on either side of the ring road, with Christchurch to the right hand side and St. Michaels & Holy Trinity to the left hand side of the roundabout, the views to left become appreciable between a gap in the buildings on the interior of the ring road. A good view of Christchurch can also be experienced from the top of Lower Holyhead Road (fig 15.4).

The provided cross-sections through this view cone indicates the level of height that could take place whilst constraint whilst preserving the view across multiple indicative assessment areas, showing a graduation of potential height capacity. Indications of the line of constraint acceptable heights are given only as potential guidance, with any application submitted within or aside the immediate adjacencies and also inclusive of background zones, requiring needing to demonstrate levels of impacts to the view, in order to provide a full assessment change in townscape.



Fig 15.3



Fig 15.4

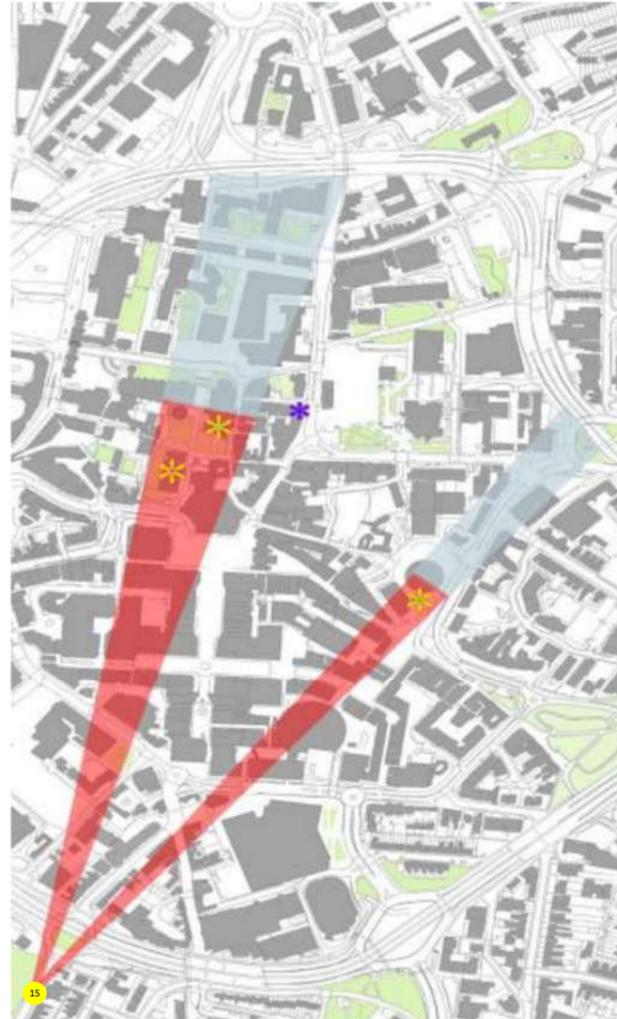


Fig 15.1



Fig 15.2

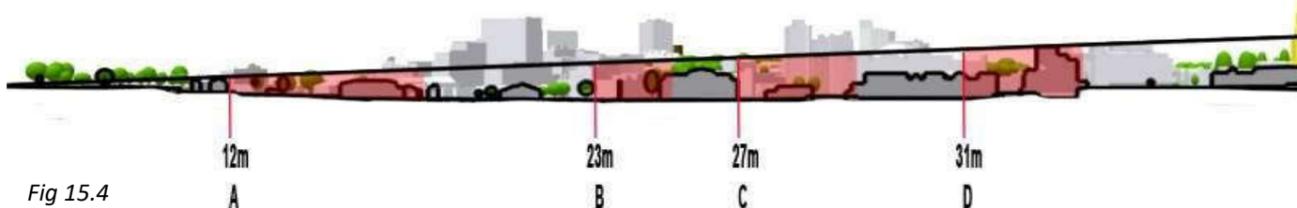


Fig 15.4

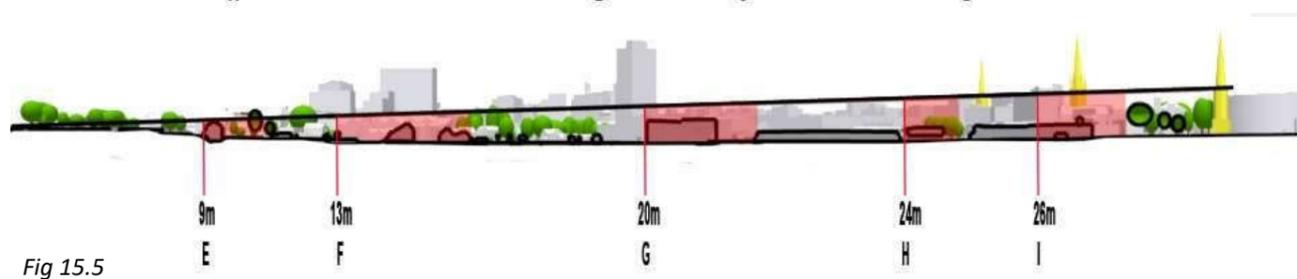


Fig 15.5

View cone 16: Upper Hill Street Footbridge

Whilst the views from Upper Hill Street are limited by developments within the ring road, excellent views become appreciable from the pedestrian footbridge crossing the ring road at the end of Upper Hill Street.

The Footbridge acts as a viewing platform offering a clear vista of the Spires on what is a busy pedestrian route into the city centre. This view is particularly sensitive due to previous developments having detracted from previously appreciable views from the junction of Upper Hill Street & Barras Lane (fig 16.6 - Historic and fig 16.7 - Current) and should be retained going forward in order to not lose the view entirely.

The provided cross-sections through this view indicatively illustrates the level of constraint in order what height could be accommodated within the view corridor without to not further infringing on the view cone.



Fig 16.5



Fig 16.6

Fig 16.7



Fig 16.1

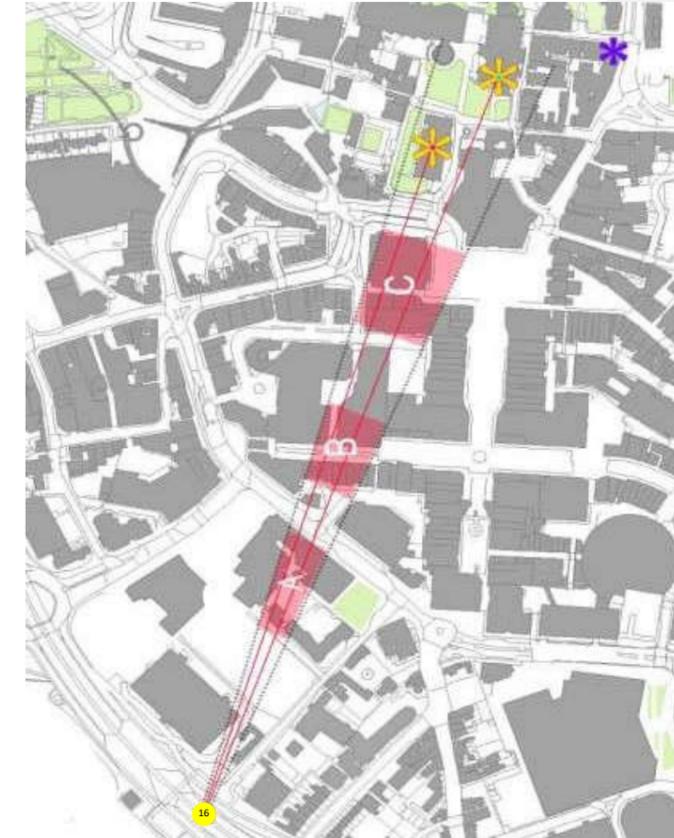


Fig 16.2



Fig 16.3

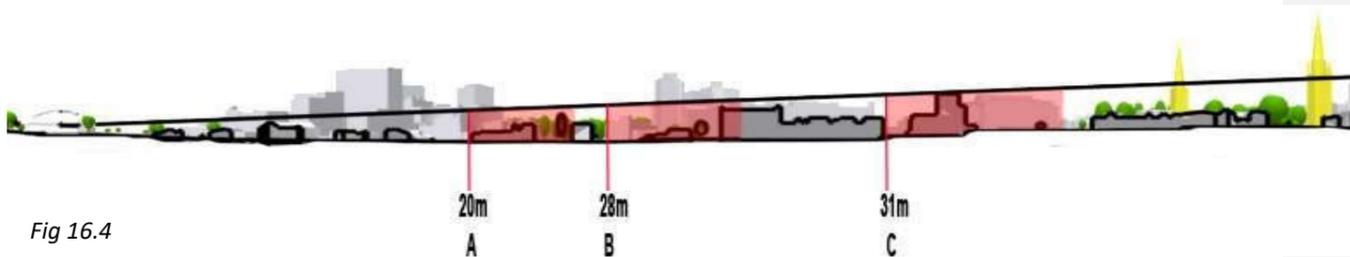


Fig 16.4

View cone 17: St Nicholas Street

St. Nicholas Street is a well used pedestrian route into the city centre and provides a visual connection from the heritage assets of the Coventry Canal Basin towards the cities three spires. St Nicholas Street offers strong views of St. Michaels and Holy Trinity, framed by modern development however remaining distinct in the skyline with positive 'space' around which benefits their primacy. From the junction with Light Lane the Spires become increasingly more prominent on the sky line with strong views looking across to Bishop Street.

The quality of the view experienced has improved with recent developments within the Civic Area which has resulted in the loss of Civic Centre 4 which previously formed the background of the Spires View. The removal of this building has resulted in this route now offering one of the best and consistent views of these Spires, which have been further framed by recent developments along Bishop Street. It is also evident on this view the importance of carefully considered street lighting infrastructure with the view somewhat compromised by a tall lighting column located aside the footbridge.

Retention of this positive viewpoint and the visual linkage between the heritage assets of the cathedral spires and the Coventry Canal Basin is crucial in delivering understanding of place, and demonstrates ~~the constraint in order to how new development may be accommodated whilst respecting this important view cones.~~ The view corridor ~~utilizes highlights two indicative development assessment area zones~~ within the city ring road to illustrate ~~the how graduations of constraint height may be deliverable~~ whilst retaining this view. Suggestions of ~~the line of constraint height capacity are is~~ made as ~~guidance only, an example of what could be achieved, however and~~ demonstrations of impact will be required to accompany any proposal which is located within, immediately aside or within the background of the view cone.



Fig 17.3



Fig 17.4



Fig 17.5

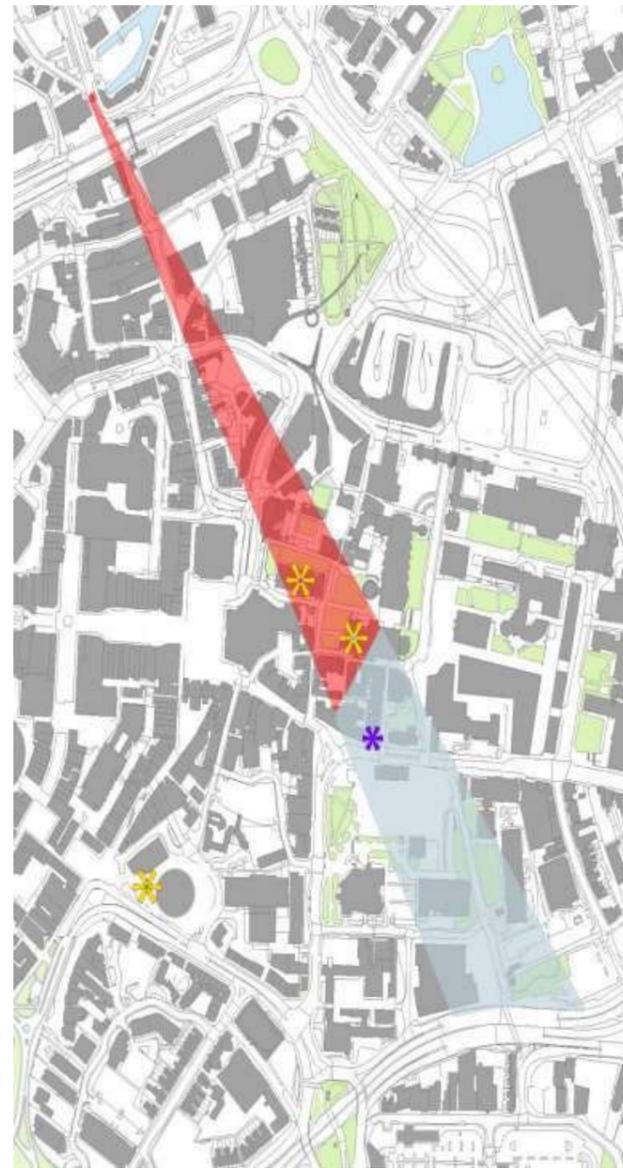


Fig 17.1

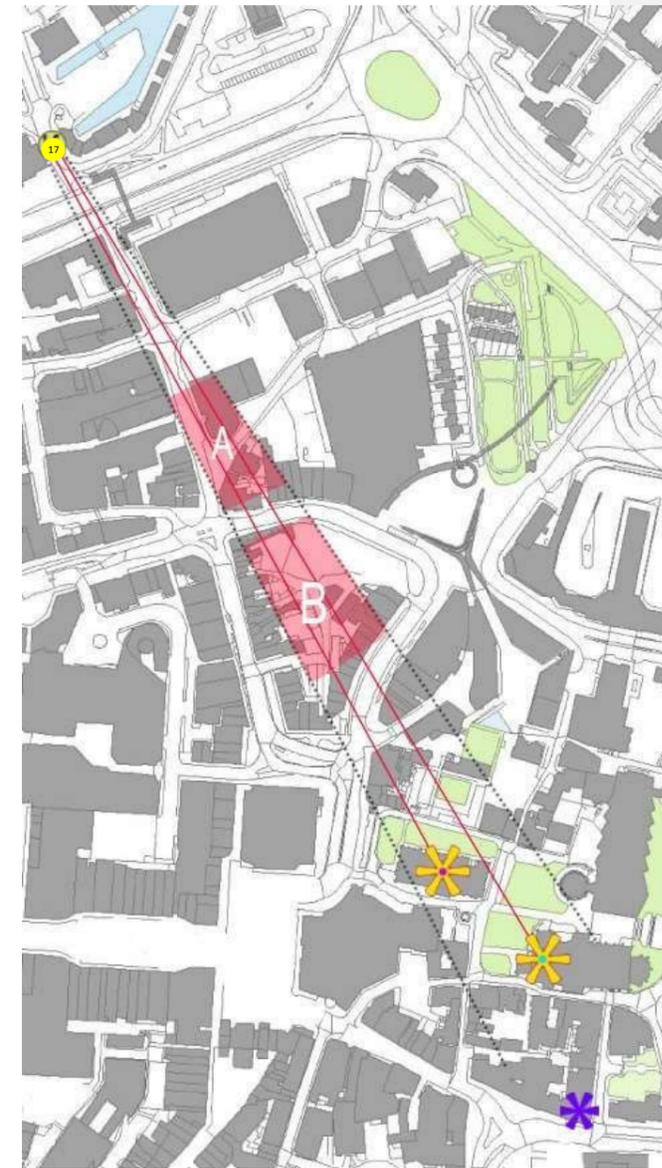


Fig 17.2

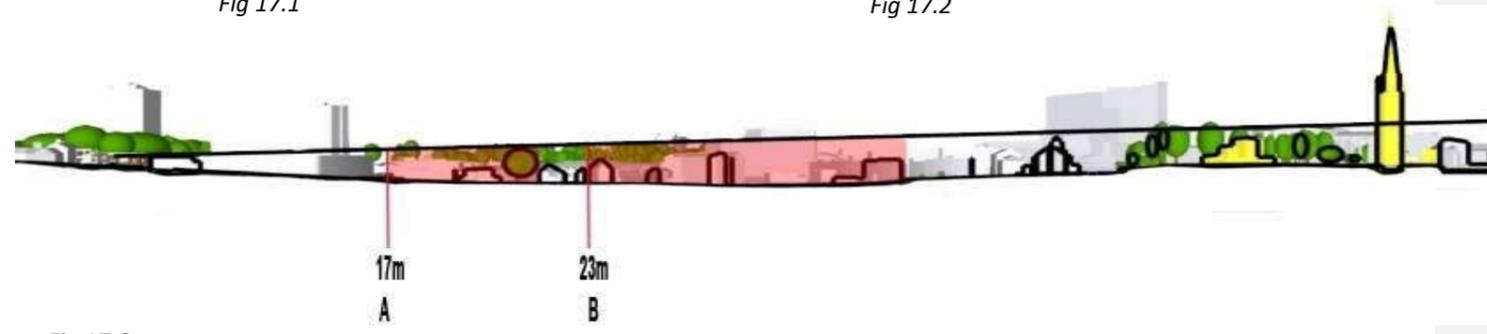


Fig 17.6



**If you need this information in another format or language please contacts us on :**

**Telephone – 02476 831109**

**Email – [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk)**

Tall Buildings Guide SPD:

Comment Reference	Respondent	Page/Para Reference	Consultation Response	Officer Summary	Proposed Change to SPD
TB1	Birmingham Airport		<p>Birmingham Airport should be consulted on proposed tall buildings or structures within close proximity of the aerodrome. This ensures the safety of aircraft operations.</p> <p>This is achieved through both the 'Obstacle Limitation Surfaces' (OLS) and the 'Instrument Flight Procedure' (IFP) protected surfaces. Safeguarding maps are available on request.</p>	<ul style="list-style-type: none"> <li>- Noted. This already happens as part of the planning application process.</li> </ul>	No action required
TB2	Historic England	General, Section 1.0, Section 3.0, Section 5.0, Section 6.0, Section 7.0, SEA Screening Assessment,	<p><b>General:</b></p> <p>Historic England recognises the clear benefits of producing an SPD for this topic area. The purpose of an SPD is to provide guidance on the application of adopted policy, and it is important to ensure that the implication of this important policy document does not adversely affect or undermine the historic, physical and social value of the historic environment. However, the document seems to stray beyond the realms of an SPD in parts and we would question whether some parts should actually be considered as policy as part of any development plan review.</p> <p>Historic England has recently published an updated Advice Note (HEAN 4), which provides advice on planning for tall buildings within the historic environment. Its purpose is to support</p>	<ul style="list-style-type: none"> <li>- Noted, and supportive comments welcomed. We do not agree that the SDP overreaches it's remit as it does not set any new policies, but articulates those already stated in the City Centre Area Action Plan adopted in 2017.</li> </ul>	No changes required.

			<p>local planning authorities (LPAs), developers, communities and other stakeholders in dealing with tall buildings proposals within the legislative and planning framework relevant to the historic environment. This can be accessed via the following link:  <a href="https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/">https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/</a></p>		
	Historic England		<p><b>Section 1.0:</b></p> <p>Firstly, we welcome that the SPD provides a clear set of criteria which the Council will expect to be addressed in any applications for tall buildings, with the principal objective of securing tall buildings of the highest possible design quality.</p>	- Noted and welcomed.	No changes necessary.
	Historic England		<p><b>Section 3.0 Pre application Advice:</b></p> <p>Historic England is also supportive of the requirements for pre-application advice on proposals for tall buildings; particularly that townscape visual impact assessments, including the identification of key views, are encouraged, and that outline applications will be discouraged</p>	- Noted and welcomed.	No changes necessary.

	Historic England		<p><b>Section 5.0 Definition of a tall building:</b></p> <p>We are also pleased to see that the local context has been considered when defining what constitutes a tall building within Coventry.</p>	- Noted and welcomed.	No changes necessary.
	Historic England		<p><b>Section 6.0 Assessment of tall building proposals:</b></p> <p>Historic England welcomes the requirement for a ‘Tall Buildings Statement’ and that the principles/criteria identified by the LPA should be addressed within these statements. We especially note and welcome the criterion that applications should illustrate the impact of tall buildings proposals on any local views and vistas</p>	- Noted and welcomed.	No changes necessary.
	Historic England		<p><b>Section 7.0 Three Spires View Management Framework:</b></p> <p>Historic England notes that this section takes forward the views of the Spires identified within Policy CC7: Tall Buildings, of the adopted City Centre Action Plan (AAP). However, we also note that for the 17 separate view cones identified toward the city’s three spires, cross sections are included which suggest potential heights of development which may be achievable at specific locations.</p> <p>In relation to this approach Historic England raises serious concerns about this part of</p>	- The draft SPD made clear that the heights identified were considered the maximum possible in the context of the impact on the established view, rather than allocating land for a tall building or providing any other such surety. However, in order to make sure this distinction is crystal-clear a number of amendments will be made to the SPD.	Adjust terminology to make sure there is no doubt that any heights referred to do not constitute an allocation or assurance that that height can be reached.

			<p>the SPD and whether it goes beyond the role of an SPD into the realms of what should be policy, especially with reference to specific locations identified within the various view cones. Furthermore, we are concerned that the suggested suitable locations for tall buildings is not informed by any robust evidence base, including Strategic Environmental Assessment/Sustainability Appraisal or by Mapping Zones of Theoretical Visibility.</p> <p>In relation to this we refer you to HEAN 4, section 4 on “Tall Buildings and the Development Plan”, which sets out that development plans should include a specific tall buildings policy accompanied by site-specific policies to support areas / sites identified as appropriate for tall buildings; or, where tall buildings proposals are the exception, as well as a more general place-shaping policy, which includes building height, density and local context.</p>		
	<p>Historic England</p>		<p><b>Tall Buildings Design Guide and Three Spires View Management Framework SPD SEA Screening Assessment:</b></p> <p>With regard to the SEA Screening Assessment that accompanies the consultation on this SPD, we consider that identifying potential locations for tall buildings within the city of Coventry may result in significant environmental effects with regard to the historic environment. As this has</p>	<ul style="list-style-type: none"> <li>- As noted above, the SPD articulates the impact heights of the protected views (as per the City Centre Area Action Plan), rather than permit tall buildings in specific locations. Changes are proposed that will make that distinction clear and,</li> </ul>	<p>Changes as per the above</p>

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>not been tested within the Development Plan, we therefore consider that a SEA should be carried out in relation to this SPD.</p> <p>As a result, we would not endorse the Authority’s conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD. We look forward to engaging with you as this SPD is progressed over the coming months and we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in later versions of the guidance) where we consider that these would have an adverse impact upon the historic environment</p>	<p>therefore, we remain of the view that an SEA is unnecessary.</p>	
TB3	The Coal Authority	General	<p>It is noted that this current consultation relates to an SPD on Tall Buildings &amp; Three Spires View Management Framework. I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.</p>	<ul style="list-style-type: none"> <li>- Coal Authority have no specific comments to make on this document.</li> </ul>	No action required

TB4	Ministry of Defence	General	In summary, the MOD have no concerns with the Tall Buildings Design Guide & Three Spires View Management Framework SPD but would emphasise that if development is proposed in excess of 50m AGL, then consultation with the MOD should take place. Policy wording that alerts developers to this potential would be welcomed.	- Policy wording for dev above 50m AGL triggering consult with MOD would be welcomed	Additional wording added at 6.15
TB5	Coventry Society	General	The Coventry Society supports the adoption of these policies. We believe that they are well considered and set out clear principles without being over-prescriptive. They tell developers what is expected of them and we believe that over time, as the city skyline changes they will be useful in bringing about improvements. They are a valuable complement to City Centre Action Plan policies.	Noted and welcomed	No action required
TB6	Fabric Advisory Committee of Coventry Cathedral	General	<b>General:</b>  The FAC welcomes the creation of a guide which respects the importance of key views of the iconic Coventry three spires and endorses the view cones identified in paragraph 6.1.6 of the Supplementary Document. It also endorses the following paragraph which states 'The omission of a viewpoint from this list should also not be taken as an indication that they are not considered significant or sensitive. The impact on views and vistas generally should always be given extremely careful and sensitive	- Comments noted and welcomed	No action required

			<p>consideration irrespective of the location and setting of any proposed tall building.'</p> <p>In addition, the Committee considers that, as you have pointed out, an additional view is worthy of explicit protection, i.e., the long view which, on the imminent demolition of the Alan Berry building, will open up along the pedestrian route through the University of Coventry campus. This view terminates in the east end of the ruined cathedral with the spire rising beyond, an iconic view in its own right captured in the celebrated John Piper water colour painting (now in the Herbert Art Gallery) created following the cathedral's 1940 destruction. While only the one spire is visible, it is a sufficiently important view to be as well protected within the policy document as that of the three spires together.</p> <p>Finally, the committee notes that, longer term, other views of the cathedral spire, and potentially the other spires, which have in the last forty or fifty years been lost or diminished may be able to be improved once current buildings are demolished. Omission of these from the view cones adopted in this document should not influence the Council's ability to introduce new view cones to the list should such opportunities arise.</p>		
--	--	--	--	--	--

<p>TB7</p>	<p>Coventry Cathedral</p>	<p>General</p>	<p>Chapter welcomes the consultation and is pleased that the Council is taking seriously the preservation of the views of our iconic 3 Spires. The 3 spires of Coventry are part of our shared history as a City and the views need to be preserved. Chapter notes that it is a shame such considerations were not made before some buildings were allowed to be built which have disrupted the views.</p> <p>In the document Chapter recognises all the views you mention and thinks they should all indeed be protected. In addition, Chapter would like to add in the view from Cox Street through the University buildings up towards the apse of the Ruined Cathedral. This is quite a narrow view, but is spectacular. With the imminent demolition of the Alan Berry building, the view may become even more significant and indeed any decisions on whether a building should be built in replacement need to consider the impact on the view and certainly to preserve it. Chapter therefore considers that this view needs to be added to your list of protected views. In conversation, I have mentioned this to the University so that they know our view of the importance of this view through their precinct.</p>	<ul style="list-style-type: none"> <li>- Comment noted and welcomed. The creation of prescribed new view points is beyond the remit of a Supplementary Planning Document. However, such matters may be considered as part of the forthcoming Plan Review.</li> </ul>	<p>No action required.</p>
<p>TB8</p>	<p>Resident</p>	<p>General</p>	<p>I had a look at the assessment criteria for tall buildings and I hope it is used properly.</p>	<ul style="list-style-type: none"> <li>- Noted</li> </ul>	<p>No action required</p>

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

TB9	Resident	General	<p>I am writing to give feedback on the Tall Buildings Design Guide &amp; Three Spires View Management Framework SPD. <b>I fully support the concept of having an SPD on the design of tall buildings and the management of the three spires view which will provide guidance for developers in the future.</b> It is much needed and, in many ways, it is a pity that it has not been in place before now. The SPD is well presented and covers the main areas; nevertheless, there are a few points which I hope will be helpful to consider.</p>	<ul style="list-style-type: none"> <li>- Comment noted and welcomed</li> </ul>	No action required
	Resident		<p><b>City-centre focus</b></p> <p>Although a focus on the city-centre and its views is important, would it be possible to extend the remit to setting standards for all tall buildings within or on Coventry’s administrative boundaries? There already have been proposals to build tall buildings outside the ring-road, in areas such as Foleshill, Earlsdon and Radford. There is a concern that if different standards are set, it could displace the siting of tall buildings as developers look to maximise their profits by locating them where they believe there are lower standards.</p>	<ul style="list-style-type: none"> <li>- The standards set out in the first part of the document are applied to all tall buildings within the boundary of the city. The view cones are those from the specific points detailed in the second part of the SPD.</li> </ul>	No action required

	Resident		<p><b>Distribution Centres</b></p> <p>With the trend in building big sheds (distribution centres) and Coventry being within the Golden Triangle, there is a need to look at their impacts especially as they are often located near to residential areas such as within mixed-use sites, on ex-greenbelt or on brownfield. Eave heights of 18m are common but there are warehouses in this country that go above 20m. In other parts of the world, 'multi-storey' warehouses have been built and there is discussion about bringing this concept over to the UK. At the moment, the SPD's definition of a tall building is 'any building above 5 storeys in height (i.e. 6 storeys or more in height from ground level)' or 'any building of 20m or above in height (inclusive of rooftop plant)'.</p> <p>Understandably, there is a focus on tall buildings in terms of their use as apartments or office-space but it is also important to consider the impacts of B8 in residential areas especially as there is little guidance on this currently.</p>	<ul style="list-style-type: none"> <li>- The SPD has set the height at what we believe to be a reasonable level. Clearly there will be buildings that fall just under this bar, and will be determined against the policies in the Local Plan, NPPF and all other relevant documents.</li> </ul>	No action required
--	----------	--	--	--	--------------------

	Resident		<p><b>Siting – roads, other building types, etc.</b></p> <p>It is good to see that there are references to siting, massing, scale and urban grain within the SPD.</p> <p>It is a concern that tall buildings are being placed so close to busy roads, including the ring road. This cannot be pleasant for whoever lives in them or for pedestrians. This practice can lead to an increase in issues with air quality by creating street canyons. Furthermore, it can be assumed that the windows facing busy roads may be sealed to avoid issues with noise pollution. Has the heat island effect and the need for ventilation been considered effectively within the design of these developments?</p> <p>Could an item be added to the climate impact section to deal with the siting of tall buildings next to roads. The management of the impacts of roads on air quality, noise pollution and the heat island effect on residents and pedestrians should be referred to including how blue green infrastructure (BGI) should be used to reduce them</p>	<ul style="list-style-type: none"> <li>- Such matters are already considerations of the planning process, and location with regards to air quality is picked up in our Air Quality SPD</li> </ul>	No action required
--	----------	--	--	---	--------------------

	Resident		<p><b>Secured by design</b></p> <p>It would be useful to have a section on crime reduction within the design guide and references to the 'Secured by Design' initiative. Their section on physical security is particularly relevant to the SPD as it refers to issues such as visitor door entry, access to landings/stairwells, CCTV, emergency door release devices, etc</p>	<ul style="list-style-type: none"> <li>- Please see responses to the representation from West Midlands Police</li> </ul>	No action required
	Resident		<p><b>Parking</b></p> <p>It is a concern to read the following within the SPD: 'Applicants should seek to ensure that car parking is located within the development or behind the building and not at the front.'</p> <p>How does this support modal shift, prevent public space from being compromised, improve air quality or reduce heat island effects? With the ever-increasing pressure for growth and densification, it is essential that the public realm is protected from becoming cluttered with cars and that inefficient parking schemes are prevented from using up land. The SPD should outline figures for parking standards and provide detail on the types of scheme which would be considered within urban environments of high housing density. Developers should be required to contribute towards public transport schemes such as the reintroduction of trams, secure park-and-ride facilities, etc.</p>	<ul style="list-style-type: none"> <li>- Parking standards are already articulated within the Local Plan. Some parking, such as disabled spaces, may still be required and it is appropriate for the SPD to set the locational expectations of these. Indeed, by ensuring that essential parking is provided to the rear of tall buildings the SPD helps maintain uncluttered public realm.</li> </ul>	No action required

			<p>The back of buildings should be prioritised for managing pick-up and drop-off, deliveries, cycle storage and waste management within a safe and secure environment</p> <p>It would also be useful if permeable paving materials and the prevention of watercourses from being contaminated through run-off from parking areas and roads into storm drains were referred to within the SPD. 'The SuDS Manual' produced by CIRIA (2015) is a useful resource for practical solutions</p>		
	Resident		<p><b>Access, services and open space</b></p> <p>Where there are limitations to providing onsite provision, it is vital that nearby locations for open space are identified and secured. Would it be possible to set standards for distances to pocket parks, children's play areas, MUGAs, etc., which are specifically tailored to the needs of a population within a high-density location? Should the developer be required to make financial contributions towards these? How will maintenance be secured in the long-term?</p>	<ul style="list-style-type: none"> <li>- Open Space matters are fully addressed in our recently adopted Open Space SPD</li> </ul>	No action required

	Resident		<p>As the trends to convert retail and office space to residential continues it is important that the provision of services keeps pace with the population increases within the city centre. Developers should be required to make contributions towards services such as GP practices, dentists, nurseries and primary schools. In addition, Coventry’s Local Plan needs to identify locations where existing provision could be expanded or new premises built. With careful neighbourhood planning, some of these services could be incorporated within the ground floors of tall buildings themselves. It is essential that the SPD highlights the importance of ‘20-Minute Neighbourhoods’,</p>	<ul style="list-style-type: none"> <li>- Developer contributions are not by this SPD. However, many of the contributions you note are already requested through the planning process. Clearly this SPD cannot dictate policy to the Local Plan, and such matters will be reviewed as part of the Local Plan Review.</li> </ul>	No action required
	Resident		<p>Approval of elderly and student accommodation needs careful consideration especially if there is any possibility of a later change of use. Smaller one bed units, limited parking and common room/shared areas without play areas/open space would not be suitable for young families. There is a real danger for student accommodation to be used as a vehicle to maximise profit by avoiding the financial contributions and standards normally attached to residential apartments. The clear demarcation of public versus private space is also an important factor and needs to be considered in terms of public access and movement through an area; public rights of way need to be clearly defined and the security features used to enclose private spaces and/or</p>	<ul style="list-style-type: none"> <li>- Conversions such as those indicated require planning permission and any required contributions and so forth would be addressed at that point.</li> </ul>	No action required

			use of signage needs to be evaluated carefully to prevent the streetscape being undermined by threatening atmospheres		
	Resident		<p><b>Use of segregation</b></p> <p>It is good to see a reference to public spaces being ‘safe, social and inclusive uses – mixed and integrated,’ that ‘the Council wants to significantly raise the standard of design in the built and green environments, as good design assists in the creation of sustainable and inclusive communities and can improve the quality of people’s lives’ and the inclusion of the statement ‘... good design can help to reduce environmental inequalities.’</p> <p>It is essential that tenants in affordable housing are treated equally and are not segregated from the rest of their community. Therefore, the SPD should cover affordable housing in more detail as segregation issues do appear to be associated with tall buildings and high-density developments.</p>	<ul style="list-style-type: none"> <li>- Affordable housing matters are addressed fully in our recently adopted Affordable Housing SPD</li> </ul>	No action required
	Resident		<p><b>Service and delivery yards, waste disposal, etc</b></p> <p>Attention should be given to pick-up and drop-off areas, cycle storage facilities, access points for delivery and locations for waste disposal. These areas can become focal points for anti-social behaviour and crime; if they are poorly designed, lack security or have an inadequate</p>	<ul style="list-style-type: none"> <li>- Noted, these areas are covered by the Design and Access Statement and other required application documentation.</li> </ul>	No action required

			<p>amount of space allocated to them, they can undermine the surrounding area and streetscape.</p>		
	<p>Resident</p>		<p><b>Appreciating our history, architecture and public art.</b></p> <p>It is good to see the phrase ‘respond to local character, history and identity’ used within the SPD but there should be a separate section on appreciating our history, architecture and public art</p> <p>It is good to see the reference to the selection of materials which ‘should be of the highest quality and should show sensitivity to their surroundings either by reference to surrounding buildings using sympathetic materials, or by positive contrast to reinforce understanding of periods of distinct development.’ Some of the tall buildings built recently do not reference their surroundings and have used garish cladding instead.</p> <p>Could a palette of colours, materials, examples of artwork and motifs be provided within the SPD to engage developers and inspire them to create buildings which will age well and portray the essence of Coventry?</p>	<ul style="list-style-type: none"> <li>- We are not able to prescribe a palette of materials or colours within the city centre. Equally we want to encourage innovative response to individual site contexts and promoting specific city-wide responses may fetter that. Such advice is best placed in Conservation Areas where a distinctive single characteristic has been identified.</li> </ul>	<p>No action required</p>

	Resident		<p><b>Providing shade</b></p> <p>Street trees will become increasingly important as we start to make adaptations for climate change. However, with densification and the competition for space within the city centre, I do have concerns about future choices of species for streets and open spaces. Will they provide enough shade? Will they have a long lifespan? We need to allow enough space and time for new trees to become our veterans and ancients of the future. Areas within the city centre need to be dedicated for planting our larger native species with the intention of them becoming our new Cofa's Trees – creating outdoor meeting places for the people of Coventry under the protection of their cooling shade and providing a symbol of hope and commitment to the future in uncertain times. However, engineered shade should not be overlooked as the use of some urban forms, such as building overhangs and breezeways, can sometimes be more effective</p>	<ul style="list-style-type: none"> <li>- Noted, tree planting and the creation of new public space are beyond the scope of this SPD.</li> </ul>	No action required
	Resident		<p><b>Building with nature</b></p> <p>Using best practice guidance, standards and benchmarks helps to streamline the planning process, ensures consistency in approach and supports Coventry City Council in keeping its policies and practice up to date. Therefore, I wondered whether it would be possible for Coventry City Council to explore the use of the 'Building with Nature Standards Framework,</p>	<ul style="list-style-type: none"> <li>- The purpose of this document is to set the requirements of Tall Buildings and also how they interact with the protected views of the Three Spires. Such matters as outlined are not sought to be addressed here, and indeed the Tall Buildings</li> </ul>	No action required.

			<p>Unfortunately, there appears to be no reference to building-dependent wildlife within the SPD To support nature recovery, it is essential that our new buildings are designed with wildlife in mind. There are excellent examples of how this can be achieved within the book and there is now a British Standard for nest boxes</p> <p>In their TAN, Oxford City Council have used a table to outline expected provision of artificial features for different types of development and a section on artificial nests or roost sites. Is that something Coventry City Council could do?</p>	<p>Technical Advice Note from Oxford City Council does not address such matters either.</p>	
	<p>Resident</p>		<p><b>Lighting schemes, etc</b></p> <p>Lighting schemes, building design/height and use of materials are factors which can have impacts upon biodiversity. Currently, the SPD appears to focus on the use of lighting to ‘enhance the appearance of tall buildings’ and there appears to be no mention of the impact on wildlife. Should all tall buildings not require a light impact assessment?</p>	<p>- This SPD is part of a suite of documents that help inform applicants and decision makers. Specific biodiversity and wildlife concerns are captured in our Biodiversity Net Gain SPD, and it is not practicable to repeat all requirements here.</p>	<p>No action required.</p>

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Chief Constable of West Midland Police		<p>The CCWMP welcomes recognition in the Draft SPD of the need for planning applications to include consideration of active frontages, natural surveillance, legible entrances and clear definition of public realm – as set out in sub8/10 section ‘Streetscape’ in section 6 ‘Assessment of tall building proposals’ (page 8).</p> <p>He also supports the recognition in paragraph 6.36 that tall buildings need to be ‘designed in a way that creates safe and visually appealing environments around them. New spaces around tall buildings should be clearly defined and be activated by public uses with transparent facades at ground floor level...’</p>	- Noted and welcomed.	No action required.
	Chief Constable of West Midland Police		<p>30. However, the Draft SPD does not currently fully meet the requirements of national planning policy, as set out in detail above, including NPPF paragraphs 92, 97, 130(f), and 187.</p> <p>31. There is a fundamental need for safety and security measures to be considered as a core design principle for tall buildings. Developments should be designed to fully address safety and security matters employing proven Secured By Design principles. This would include consideration of all relevant measures to reduce crime, anti-social behaviour and the fear of crime. In addition, there is a need for counter-terrorism measures to be intrinsic within the design of tall buildings to reduce the risk of them</p>	- Whilst we disagree that the SPD is contrary to the NPPF, we do consider that a subparagraph highlighting the NPPF requirements regarding crime and safety would be helpful	Additional wording added at 2.10 – policy context

			<p>becoming potential targets for terrorist attacks.</p> <ul style="list-style-type: none"> <li>- Section 6 'Assessment of tall building proposals'</li> <li>- <u>'Architectural and Security Lighting'</u> Paragraph '6.32 'Applications should, where appropriate give consideration to the incorporation of architectural lighting effects into any proposal for a tall building. <b>Consideration should also be given to the use of lighting to illuminate approach pathways, lobbies, communal areas and internal walkways to reduce crime, anti-social behaviour and the fear of crime.</b></li> </ul>		
	<p>Chief Constable of West Midland Police</p>		<p>32. Appropriate wording is also required in the SPD to protect the sensitive operational requirements of Police premises in the vicinity of any proposed tall buildings, as required by NPPF paragraph 97(b). This is in terms of, for example preventing overlooking and maintaining unobstructed telecommunication communications pathways. Development of tall buildings should not be an agent of change. Current and future Police operational requirements should not be compromised by the development of a nearby tall building.</p>	<ul style="list-style-type: none"> <li>- This is already covered by National Policy, which the SPD does not seek to repeat.</li> </ul>	<p>No action required</p>

	Chief Constable of West Midland Police		<p>33. To appropriately address the design requirements for tall buildings, the CCWMP requests reference is made in the SPD to the need for early engagement with West Midlands Police Design Out Crime &amp; Crime Reduction Officers, together with counter-terrorism officers, at the preapplication stage.</p> <ul style="list-style-type: none"> <li>- Section 3 'Pre application advice' paragraph 3.1 <i>'Prospective applicants and their agents should note that it will be strongly encouraged to engage in Pre-application discussions with the LPA and West Midlands Police Design Out Crime &amp; Crime Reduction Officers, and with counter-terrorism officers for developments of tall buildings in the city</i></li> </ul>	As the Local Planning Authority, it would not be appropriate for us to suggest engagement with third parties as a requirement of our planning pre application process.	No action necessary
TB10	Chief Constable of West Midland Police	General	<p>34. Therefore, the CCWMP formally requests that the following additional wording is included in the final version of the SPD. The proposed amendments are written in <b>'bold'</b> text:</p> <p><u>'Public Realm'</u> paragraph 6.35 'Applications should describe how the public space around the building has been designed to the highest quality; indicate how the proposal will where appropriate incorporate ground floor uses which encourage active use of the building throughout the day <b>and evening</b>; and, where appropriate provide a comprehensive scheme of quality external landscaping <b>with a maintenance plan</b></p>	<ul style="list-style-type: none"> <li>- Para 6.35 – agreed</li> <li>- Para 6.42 – there will be a number of exceptions, and the SPD does not propose to list them all here, especially where NPPF and Local Plan policies are clear</li> <li>- Para 6.43 – This point is covered by the outlook point</li> <li>- Para 6.47, 6.50 – The SPD cannot set requirements that are not in the Local Plan or the NPPF, such as</li> </ul>	<p>Revision to wording at 6.35 to incorporate 'evening' and maintenance plan</p> <p>Addition of Designing out Crime section at 6.40</p>

			<ul style="list-style-type: none"> <li>- <u>'Neighbourliness'</u> paragraph 6.42 'Applications should analyse and describe the impact of proposals on neighbouring buildings. <b>Particular attention should be paid to separation distances, height and overlooking where a tall building is proposed near an operational Police premises</b></li> <li>- <u>'Neighbourliness'</u> paragraph 6.43 The potential impact of a tall building on the amenities of surrounding residents is of particular importance when considering the impact of any proposed tall buildings. Issues that require careful assessment include...<b>overlooking.</b></li> <li>- <b>'Design out Crime' new paragraphs</b> <ul style="list-style-type: none"> <li>▪ <b>6.47 All tall building designs will be required to meet Secured By Design standards and consider safety and security and the need to reduce anti-social behaviour and the fear of crime.</b></li> <li>▪ <b>6.48 Designs should seek to prevent crime and be developed in consultation with the Force Design Out Crime &amp; Crime Reduction Officers at the pre-application stage.</b></li> <li>▪ <b>6.49 Any relevant counter terrorism standards applicable at the time should be taken into consideration.</b></li> <li>▪ <b>6.50 Details of Secured By Design compliance should be included in Design and Access Statements and Tall</b></li> </ul> </li> </ul>	<p>the use of Secured by Design.</p> <ul style="list-style-type: none"> <li>- Para 6.48 – It is not appropriate for us to require specific third party engagement as part of the pre application process</li> <li>- Para 6.49 – Agreed</li> <li>- Para 6.51 - Agreed</li> </ul>	
--	--	--	--	---	--

			<p><b>Building Statements at the planning application stage.</b></p> <p>▪ <b>5.51 All design proposals should consider the legacy of the development and whether a maintenance plan would be appropriate, particularly in communal areas, to reduce the risk of crime in the short, medium and longerterm.</b></p>		
	Chief Constable of West Midland Police		<p>Conclusions:</p> <p>35. The CCWMP has a statutory duty to secure the maintenance of an efficient and effective Police force for its area and the Council has a statutory requirement to consider crime, disorder, and community safety in the exercise of its planning functions.</p> <p>36. It is requested that in accordance with national planning policy, the theme of community safety, security and crime prevention is given greater prominence in the SPD to promote sustainable new communities where safety, reducing crime, fear of crime and anti-social behaviour, are prioritised. It is proposed that this be achieved by introducing additional wording into the SPD, including the introduction of a new sub-paragraph within Section 6 to address the need to design out crime.</p>	<ul style="list-style-type: none"> <li>- Noted, the CCWMP is a statutory consultee of relevant planning applications, giving appropriate opportunity to be engaged in planning applications. The insertion of some of the suggested wording into section 6 gives the greater prominence requested.</li> </ul>	No action required

			37. The CCWMP formally requests that relevant officers are invited to be involved in the design of developments. The centrally based Design Out Crime Team (DOCT) have extensive knowledge of security measures and 'Designing Out Crime		
TB11	Communities and Neighbourhoods Scrutiny Board		<p>Members of the Board made the following comments:</p> <ul style="list-style-type: none"> <li>• Concerns that the proposals could lead to lots of tall buildings in one area of the city centre where views aren't affected</li> <li>• Whether views opened up by the removal of buildings could be added to the protected views</li> <li>• How the viewpoints were identified.</li> <li>• Whether the viewing points were promoted as tourist attractions.</li> </ul>	- Question raised on how to secure views potentially opening up in the future	No revision to SPD necessary

**Strategic Environmental Assessment of the Tall Buildings  
Design Guide & Three Spires View Management Framework  
Supplementary Planning Document**

---

**Coventry City Council**

**Strategic Environmental Assessment Screening Assessment**

**July 2022**

## **1. Introduction**

- 1.1 This screening report has been produced to consider whether the Tall Buildings Design Guide & Three Spires View Management Framework Supplementary Planning Document (SPD) prepared by Coventry City Council should be subject to a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, as amended by The Environmental Assessments and Miscellaneous Planning (Amendment)(EU Exit) Regulations.
- 1.2 Paragraph: 008 of the Planning Guidance<sup>1</sup> states that supplementary planning documents may in exceptional circumstances require SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. This screening statement considers whether there are any impacts which have not already been assessed within the Coventry Local Plan and City Centre Area Action Plan (AAP) which were adopted on 6th December 2017<sup>2</sup>, and determines whether or not SEA is needed for this SPD.

## **2. The Tall Buildings Design Guide & Three Spires View Management Framework SPD: Context**

- 2.1 The Draft Tall Buildings Design Guide & Three Spires View Management Framework SPD sets out further detail on existing policies contained within the Coventry City Council Local Plan (in particular, Policy DE1: Ensuring High Quality Design), and also the policies and allocations in the adopted City Centre AAP (especially Policy CC7: Tall Buildings which commits to providing further detail). The Local Plan and AAP form the City Council's statutory planning framework which sets out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created, enhanced and protected.
- 2.2 Delivering high quality design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan, and the complementary adopted AAP provides further elaboration including specific guidance for the City Centre relating to the protection of the views of the iconic Three Spires of St. Michael, Holy Trinity and Christchurch. The aim of this SPD is to facilitate the delivery of good design in relation to tall buildings, including the need to protect important city views as set out in the adopted plans and in compliance with the most up to date national policy as set out in the National Planning Policy Framework.
- 2.3 The additional guidance provided within the SPD sets out a series of principles for good design of tall buildings overall whilst also ensuring through the View Management Framework that proposals for tall buildings are appropriately considered within the context of key views of the spires, to protect the setting of important heritage assets.

---

<sup>1</sup> Reference ID: 11-008-20140306

<sup>2</sup> <https://www.coventry.gov.uk/localplan>

### 3. The Screening Process

3.1 The screening assessment is undertaken in two parts: the first will assess whether the SPD requires screening for SEA and the second part of the assessment will consider whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

**Table 1: Is SEA screening required?**

Environmental Regulations Paragraph detail	Comments
<p>2.(1) In these Regulations- [...] "plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which— (a) are subject to preparation and adoption by an authority at national, regional or local level; (b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case, (c) are required by legislative, regulatory or administrative provisions</p>	<p>Yes, this applies.</p> <p>The SPD is subject to preparation and adoption at local level. Whilst the SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act it will, if adopted, supplement the development plan and be a material consideration in the assessment of planning applications.</p>
<p><u>Environmental assessment for plans and programmes; first formal preparatory act on or after 21st July 2004</u> 5.(2) The description is a plan or programme which— (a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and (b) sets the framework for future development consent of projects listed in Annex I or II Directive 2011/92/EU(4) of the European Parliament and</p>	<p>Yes, this applies.</p> <p>The SPD is prepared for town and country planning purposes. It supplements the planning policy framework of the Coventry City Local Plan, by providing detailed guidance as to how these policies are interpreted for future consent of projects listed in Schedule II of Directive 2011/92/EU(4).</p>

<p>of the Council on the assessment of the effects of certain public and private projects on the environment.</p>	
<p>3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</p>	<p>No this does not apply.</p> <p>The SPD is not likely to affect sites and has been determined not to require an assessment pursuant to any law that implemented Article 6 or 7 of the Habitats Directive.</p> <p>Habitat Regulations Assessment is not required. The Habitat Regulation Assessment undertaken in 2016 for the Coventry City Local Plan concluded that the plan would not cause a negative effect alone or in combination with other plans. The SPD does not provide any guidance which alters the impact of the policy on designated sites.</p>
<p>6) An environmental assessment need not be carried out—  (a)for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level, or  (b)for a minor modification to a plan or programme of the description set out in either of those paragraphs,</p>	<p>Yes this applies. The SPD elaborates on city – wide design issues in relation to tall buildings, with an additional view-management focus which relates to the spires of the city centre. However SEA / SA was already undertaken for the adopted Local Plan and AAP from which this SPD stems, the SPD does not introduce new policy.</p>
<p><u>Determinations of the responsible authority<sup>3</sup></u>  9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in—  (a)paragraph (4)(a) and (b) of regulation 5;  (b)paragraph (6)(a) of that regulation; or  (c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects.  (2) Before making a determination under paragraph (1) the responsible authority shall—</p>	<p>This screening opinion has been prepared using the criteria specified in Schedule 1 as presented in Table 2.</p> <p>The statutory bodies (Natural England, Historic England and the Environment Agency) are to be consulted as required.</p>

<sup>3</sup> “Responsible authority”, in relation to a plan or programme, means the authority by which or on whose behalf it is prepared (Regulation 2(1)(a))

(a)take into account the criteria specified in Schedule 1 to these Regulations; and (b)consult the consultation bodies.	
--	--

**Table 2: will the SPD have a significant effect on the environment<sup>4</sup>**

SEA requirement	Comments
1: The characteristics of plans and programmes, having regard, in particular, to	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The SPD forms a material consideration in decisions on planning applications, it operates within the scope of the adopted Local Plan and AAP but provides further elaboration.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD does not create new policies but will support the policies in the adopted Local Plan and AAP. Other plans and programmes may outlive the SPD and during their preparation will be steered by national legislation and policy.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The purpose of the SPD is to provide guidance to support the design policy of the adopted Local Plan and AAP. The Local Plan SA/SEA assessed this. The purpose of the SPD is to ensure these beneficial impacts of that policy are delivered and maintained which contributes to promoting sustainable development.
(d) environmental problems relevant to the plan or programme; and	There are no environmental problems relevant to this SPD: it elaborates adopted Local Plan and AAP policy.
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked	The SPD has no relevance to the implementation of retained EU law.

<sup>4</sup> As set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

to waste management or water protection).	
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—	
(a) the probability, duration, frequency and reversibility of the effects;	The SPD is not allocating sites for development. The SPD is to provide guidance for the application and implementation of the policies in the adopted Local Plan and AAP and is not expected to give rise to any significant environmental effects.
(b) the cumulative nature of the effects;	The SPD is not considered to have any significant cumulative effects. As the document provides further guidance to adopted local plan and AAP policies, but does not set policies itself, it cannot contribute to cumulative impacts in combination with the Local Plan and AAP.
(c) the transboundary nature of the effects;	There are no transboundary effects as this SPD relates to the Coventry City Council area only. Any potential significant transboundary environmental effects have already been assessed as part of the local plan's sustainability appraisal, the Habitat Regulations Assessment and the plan's examination process.
d) the risks to human health or the environment (for example, due to accidents);	The SPD poses no risk to human health.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The SPD relates to Coventry City Council's administrative area only.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	The SPD relates to the Coventry City Council area only as no development is proposed via the SPD, which elaborates on existing policy, none of these are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.
(g) the effects on areas or landscapes which have a recognised national,	The SPD relates to the Coventry City Council area only; as no development

Community or international protection status.	is proposed via the SPD, which elaborates on existing policy, none of these matters are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.
---	---

#### **4. Conclusion and Screening Recommendation**

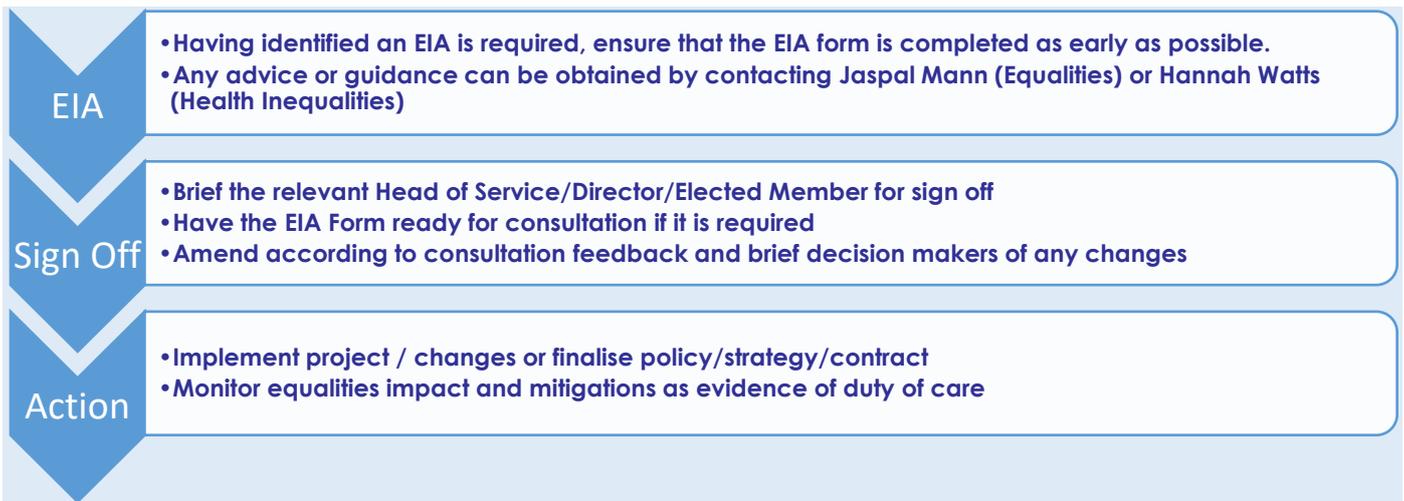
4.1 This screening assessment identifies that the SPD will provide guidance to support the design policy of the Coventry City Council adopted Local Plan and the City Centre AAP. It is concluded that the SPD is unlikely to have significant environmental effects and therefore that Strategic Environmental Assessment is not required.

This page is intentionally left blank

## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Title of EIA</b>		<b>EIA Tall Buildings Design Guide &amp; Three Spires View Management Framework SPD</b>
<b>EIA Author</b>	Name	<b>Clare Eggington</b>
	Position	<b>Planning Policy Manager</b>
	Date of completion	<b>07/07/2022</b>
<b>Head of Service</b>	Name	<b>David Butler</b>
	Position	<b>Head of Planning Policy and Environment</b>
<b>Cabinet Member</b>	Name	<b>Councillor David Welsh</b>
	Portfolio	<b>Housing and Communities</b>



**PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM**

### SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning

## EQUALITY IMPACT ASSESSMENT (EIA)



Other project (*please give details*) *Supplementary Planning Document for Householder Design*

1.2 In summary, what is the background to this EIA?

The Tall Buildings Design Guide & Three Spires View Management Framework Supplementary Planning Document (SPD) adds further detail to the Local Plan and City Centre Area Action Plan (AAP) which were adopted on 6<sup>th</sup> December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

Delivering high quality design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan and City Centre Area Action Plan. The aim of this SPD is to facilitate the delivery of high quality design in relation to tall buildings (including the protection of views of the city centre spires) as set out in the adopted plans and in compliance with the most up to date national policy as set out in the National Planning Policy Framework.

The additional guidance provided within the SPD sets out detail for developers who are designing schemes for tall buildings.

1.3 Who are the main stakeholders involved? Who will be affected?

Developers, those who will live / work in the properties, the communities where the properties will be located, those who have an interest in the way in which plans are prepared (eg the various statutory consultees)

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Service

### SECTION 2 – Consideration of Impact

*Refer to guidance note for more detailed advice on completing this section.*

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not

## EQUALITY IMPACT ASSESSMENT (EIA)



- Foster good relations between persons who share a relevant protected characteristic and those who do not

### 2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan and AAP were independently examined by a Planning Inspector to ensure that policies were robust and formulated using appropriate evidence before they could be sound and capable of adoption. Further detail on the Local Plan, AAP and the evidence base can be found here

<https://www.coventry.gov.uk/localplan>

This SPD expands upon adopted Local Plan Policy DE1, Ensuring High Quality Design, and AAP policy CC7 (Tall Buildings). It provides additional for guidance developers who are designing tall buildings to ensure they produce high quality design which also respects the historic landscape of the city.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

*\*Any impact on the Council workforce should be included under question 2.6 – **not below***

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Whilst those aged 0-18 would generally not be directly involved in the design process, some may live in new tall buildings or in the environment / community which they impact and the SPD will ensure that such developments are of a high standard. 19.5% of the population are aged 0-15 so well over a fifth of the population (when the 16-18 year olds are factored in) could potentially benefit.
Age 19-64	P	67% of the population of Coventry are of working age (16-64). Many will live and work in new tall buildings or in the environment / community which they impact and the SPD will ensure that such developments are of a high standard.

## EQUALITY IMPACT ASSESSMENT (EIA)



Age 65+	<b>P</b>	13.5% of Coventry's population aged above 65. As above, many may live in new tall buildings or in the environment / community which they impact, and the SPD will ensure that such developments are of a high standard.
Disability	<b>P</b>	17.7% of Coventry's residents have a limiting long term health problem or disability. The SPD encourages good design in new tall - build developments.
Gender reassignment	<b>P</b>	Good building design has a positive impact on everyone in the community.
Marriage and Civil Partnership	<b>P</b>	Good building design has a positive impact on everyone in the community.
Pregnancy and maternity	<b>P</b>	Good building design has a positive impact on everyone in the community.
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>P</b>	Good building design has a positive impact on everyone in the community.
Religion and belief	<b>P</b>	Good building design has a positive impact on everyone in the community.
Sex	<b>P</b>	Good building design has a positive impact on everyone in the community.
Sexual orientation	<b>P</b>	Good building design has a positive impact on everyone in the community.

### HEALTH INEQUALITIES

<b>2.3</b>	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p>
------------	--

## EQUALITY IMPACT ASSESSMENT (EIA)



<p><b>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</b></p> <p><b>If you need assistance in completing this section please contact: Hannah Watts (<a href="mailto:hannah.watts@coventry.gov.uk">hannah.watts@coventry.gov.uk</a>) in Public Health for more information. More details and worked examples can be found at <a href="https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx">https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</a></b></p>		
Question	Issues to consider	
<p>2.3a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> <li>● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>)</li> <li>● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation</li> </ul>	
<p>Response:                  The Tall Buildings Design Guide &amp; Three Spires View Management Framework Supplementary Planning Document (SPD) supplements the policies of the adopted Local Plan / Area Action Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the Local Plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See <a href="https://www.coventry.gov.uk/localplan">https://www.coventry.gov.uk/localplan</a> This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to design. See <a href="https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd">https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd</a>                  Whilst only major residential applications are subject to HIA, the explanatory text still encourages the use of the toolkit for smaller developments than those covered by the policy (which relates to developments of 150 homes or more, or a site area of 5 hectares or more). This Tall Buildings Design Guide &amp; Three Spires View Management Framework Supplementary Planning Document (SPD) will help provide further guidance on good design (in terms of the tall building itself but also in relation to the surrounding area) and this will help to ensure decent living standards especially in terms of amenity, avoiding negative impacts (for example outlook, aspect, privacy, daylight, sunlight, noise, light glare, overbearing impact and an increased sense of enclosure).</p>		
<p>2.3b How might your work affect HI (positively or negatively).  How might your work address</p>	<p><b>Consider and answer below:</b></p> <ul style="list-style-type: none"> <li>● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income</li> <li>● Consider what the unintended consequences of your work might be</li> </ul>	



the needs of different groups that share protected characteristics

Response:

a. Potential outcomes including impact based on socio-economic status or geographical deprivation

The Health Impact Assessment SPD referred to above includes the following:

**Category 1: Housing Quality and Design**

Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has an impact on community welfare, cohesion and mental wellbeing.

Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents
<ul style="list-style-type: none"> <li>• Accessible and adaptable dwellings</li> <li>• Internal space standards, orientation and layout</li> <li>• Affordable housing and dwelling mix</li> <li>• Energy efficiency</li> <li>• High Quality Design</li> </ul>	A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.	Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.	<ul style="list-style-type: none"> <li>• AC2: Road Network</li> <li>• DE1: Ensuring High Quality Design</li> <li>• DS3: Sustainable Development Policy</li> <li>• EM2: Building Standards</li> <li>• EM5: Sustainable Drainage Systems SuDS</li> <li>• H3: Provision of New Housing</li> <li>• H4: Securing a Mix of Housing</li> <li>• H5: Managing Existing Housing Stock</li> <li>• H6: Affordable Housing</li> <li>• H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation</li> <li>• Coventry Connected (Transport) SPD</li> <li>• Delivering a more Sustainable City SPD</li> </ul>
	Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.	Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.	
	The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be	
		provided in the community more easily.	<ul style="list-style-type: none"> <li>• Sustainable Urban Extension Design Guide SPD</li> </ul>

b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

Ensuring well designed developments to meet a range of needs and circumstances is a key aim of the Local Plan (and AAP) design policy and the SPD provides the further detail to ensure that policy can be delivered.

Policy DE1 of the Local Plan sets out the context, and the SPD provides the detail for ensuring that tall building developments are well designed and appropriate to meet the changing needs of the communities impacted.

## EQUALITY IMPACT ASSESSMENT (EIA)



### 2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

This was considered through the Local Plan and the AAP (the 'parent documents'), this document provides the detail to ensure the Local Plan and AAP policies can be delivered effectively. The SPD elaborates on adopted Policies DE1 and CC7 to ensure that high standards of design are implemented.

### 2.5 How will you monitor and evaluate the effect of this work?

Planning applications and their outcomes are monitored. However there is scope to improve the monitoring process and this is an action which will be undertaken by the planning policy team to consider moving forwards in terms of the effectiveness of design policy. In terms of the outcomes of further monitoring, if there are issues which are emerging, this can then be fed into a review of the wider local Plan policies.

### 2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: [lucille.buckley@coventry.gov.uk](mailto:lucille.buckley@coventry.gov.uk)

#### **Headcount:**

##### **Sex:**

Female	
Male	

##### **Age:**

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

##### **Disability:**

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

##### **Ethnicity:**

##### **Religion:**

## EQUALITY IMPACT ASSESSMENT (EIA)



White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

**Sexual Orientation:**

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

### 3.0 Completion Statement

**As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:**

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

### 4.0 Approval

<b>Signed: Head of Service: David Butler</b>	<b>Date:</b>
<b>Name of Director: Andrew Walster</b>	<b>Date sent to Director:</b>

## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Name of Lead Elected Member:</b> Councillor D Welsh	<b>Date sent to Councillor:</b>
---	---------------------------------

Email completed EIA to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk)

This page is intentionally left blank



---

Cabinet

13<sup>th</sup> December 2022

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

**Director Approving Submission of the report:**

Chief Operating Officer (Section 151 Officer)

**Ward(s) affected:**

City wide

**Title:**

Pre-Budget Report 2023/24

---

**Is this a key decision?**

Yes

Cabinet is being recommended to approve, as a basis for consultation, the spending and savings and Council Tax proposals for 2023/24 and future financial years

---

**Executive Summary:**

This report outlines as a basis for consultation a set of new revenue budget proposals for 2023/24 to 2025/26 which represent changes to the Council's existing Budget. Consultation views are also sought on the potential level of Council Tax and Adult Social Care Precept increases for 2023/24. The final Budget proposals and the Council Tax and Adult Social Care Precept increases will be subject to Council approval in February.

The need to deliver the Council's overall future strategy continues to be the focus of the Pre-Budget proposals. The strategy is contained within the draft "One Coventry Plan" which sets out key priorities including: improving the economic prosperity of the city and region; improving outcomes and tackling inequalities within communities; and tackling the causes and consequences of climate change. Implicit within the plan is the Council's commitment to delivering a range of core services to everyone in the city. Following an extensive period of engagement, the Plan will be brought for approval in 2023.

The Council's financial plans are heavily dependent on both the allocation of Government grant resources and Government decisions which dictate councils' tax-based income streams. The turmoil in national politics through 2022 has made it more difficult than usual to anticipate the key decisions that the Government will make on these matters. As a result, a number of key elements of the Council's financial plans are subject to some uncertainty with a degree of risk that the position presented in this report could be subject to change once the details of the Local Government financial settlement are published. The Provisional Local Government Settlement for 2023/24 is

expected to be published in the week beginning 19<sup>th</sup> December, and this will provide a stronger indication of the likely position.

The Chancellor of the Exchequer set out the Government's Autumn Statement on 17<sup>th</sup> November 2022. The Statement provided a two year Department Expenditure Limit position for the Department of Levelling Up Housing and Communities (DLUHC) which indicates an increase in its budget compared with the previous position. The estimated impact for Coventry, if this movement was reflected in the resources made available to local government, is included within Appendix 1. The largest single change is the flexibility to use an estimated £5m of additional grant in 2023/24 which was earmarked previously by Government for Adult Social Care charging reforms that have now been postponed. Additional flexibility has also been provided with regard to the maximum permissible increase in Council Tax. As a result, this report recommends that the Council should consult on the basis of increasing the Adult Social Care Precept by 2%, and the Council Tax for other services by just under 3%, an overall combined rise of just under 5%.

The financial measures in this report include some service savings or additional income proposals although only a very small number affect services to the public. This has been achieved due to the combination of the overall impact of the Autumn Statement plus the proposed implementation of a range of technical measures. Depending on the final outcome of the Local Government Settlement this could include using one-off resources (in the form of reserves) to meet one-off pressures, if required, although no such measures are proposed at this stage. The Council is keen to avoid the need to reduce vital services and will seek to explore all possible avenues to do this. This report includes sufficient measures to set a balanced budget in 2023/24 albeit with financial gaps in future years.

A Medium Term Financial Strategy is intended to be presented alongside the final Budget Report in February. This will include the dramatically changed economic and financial landscape facing the Council and will include approaches informed by the draft One Coventry Plan. This may include: delivering some services flexibly across roles, services and organisations; investing resources with other public sector partners; and actively seeking new opportunities and cultivating new relationships. This is expected to form an increasing focus of the Council's activity in the future to improve the manner and cost effectiveness with which the Council is able to deliver and facilitate the provision of services to its citizens.

The proposals in this report are made as a basis for public consultation and the results of the consultation will be reflected in the final Budget Report in February and considered as part of the final decisions recommended in that report. Further work will be undertaken to confirm all the financial assumptions included, between now and the final Budget Report in February.

An outline of the resources and the spending and savings proposals are provided in Section 2 and on a line by line basis in Appendix 1. The Council's Council Tax assumptions and the basis on which it is consulting is set out within Section 2.

This report includes an indicative outline of the Council's prospective Capital Programme for 2023/24 based on current knowledge. This will be updated in the February Budget Report, reflecting the most up to date programme information available. The draft programme is based overwhelmingly on pre-existing decisions and patterns of expenditure.

### **Recommendations:**

The Cabinet is requested to:

- 1) Approve as a basis of consultation: the revenue spending and savings options in Section 2 and Appendix 1 of the report; the broad Capital Programme proposals in sections 2.6 to 2.9

of the report; the approach in relation to Council Tax and the Adult Social Care Precept in Section 1.8 of the report, including a Council Tax rise of just under 3% and an Adult Social Care Precept of 2%.

**List of Appendices included:**

Appendix 1 – Pre-Budget Proposals and Financial Position

**Background papers:**

None

**Other useful documents**

None

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

No

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

No

**Will this report go to Council?**

No. The final budget proposals will be considered by Council following the consultation period.

**Report title:  
Pre-Budget Report 2023/24**

**1. Context (or background)**

- 1.1 Proposals for the Council's 2023/24 Budget are set out in this report. The Government's Spending Review announcement on 17<sup>th</sup> November indicated an increase in the likely support for local government although at the time of writing the Council is still awaiting the 2023/24 Provisional Local Government Finance Settlement which will include details on a number of key funding announcements and will dictate the funding envelope within which the Council will need to operate next year.
- 1.2 The Provisional Settlement should be received in the week beginning 19<sup>th</sup> December followed by a final settlement announcement a few weeks into 2023. The starting point of the 2023/24 Budget process following setting of the 2022/23 Budget was an initial financial gap for 2023/24 of £17m, rising to £28m by 2025/26. These figures were based on broad assumptions about the Council's financial position, including the impact of the wider local government finance system.
- 1.3 In the period since February, work has been undertaken to update the assumptions that underpin this position with the underlying objective of meeting the immediate budget gap and to address the medium term financial position. Any changes to the existing position have been included within the Appendix to this report including the increase in inflationary pressures within the economy which has had a fundamental impact on the Council's financial position over this period.
- 1.4 Due to uncertainty surrounding a number of factors which influence the Council's financial position, the Medium Term Financial Strategy (MTFS) has been delayed. The Strategy will be considered as part of the final Budget Setting report in February. Prior to setting the final Budget in February, the Council will be required by law to establish the Council Tax and Business Rates tax-bases for 2023/24 and declare projected deficits or surpluses from previous years. Initial estimates of these tax-bases have been included in the financial projections within this report although it is expected that these will be refined in the final Budget Report.
- 1.5 As part of the Council's overall financial approach is its commitment to protect the most vulnerable citizens and to deliver a range of core services to everyone in the city. This has become increasingly difficult in recent years following reductions in resource levels for local government and made worse as a result of rising prices and their impact on the cost of living over the past 12 months. The combination of resource constraints and pressure on some aspects of Council services means that the challenge of balancing the Budget is as great as ever.
- 1.6 The financial position presented in this report includes: assumptions about the forthcoming Government settlement; anticipated additional costs from inflation and from financial pressures within some services; and a range of service and technical savings to help balance the bottom line position. All the changes to the previously approved Budget position are set out in Appendix 1. Most of the service savings are not ones which are likely to have a significant impact on front-line services but are either technical in nature or reflect activity designed to make the Council activity more cost effective and commercial. This continues what the Council considers to be a balanced and prudent approach to seeking commercial opportunities that dovetail with or are aligned to its existing activities.

- 1.7 The range of resource assumptions is informed to a degree by the 2022 Autumn Statement and also by the shape of the 2022/23 Local Government Settlement. These remain planning estimates only and are subject to confirmation by Government. The descriptions set out in Appendix 1 give an indication of the implications of each proposal.
- 1.8 This report proposes that the budget consultation is carried out on the basis that the Council will increase Council Tax levels by just under 5%, the figure which it has been indicated by Government will be the maximum amount allowable without triggering a referendum. This is made up of a 2% Adult Social Care Precept and an increase of just under 3% for other expenditure. It is possible that increases in the Police and Fire precepts could result in a total Council Tax rise above 5%.

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

- 2.1 The remainder of the report details the financial position facing the Council and the specific proposals put forward for consultation. These proposals are detailed within Appendix 1.

### **Revenue**

- 2.2 After taking account of all Council approved decisions, the Council started the 2023/24 Budget process with a shortfall of £17m rising in subsequent years. Overall resources include the Government settlement, amounts in relation to Council Tax and Business Rates and several specific grants that the Government includes within its definition of Core Spending Power. Movements in this category include the following:
- The Autumn Statement has provided initial indications of additional resources for local government although the precise detail will not be known until publication of the Local Government Provisional Settlement. The changes listed in Appendix 1 make some assumptions about the level of additional funding and the types of area where this might be applied. These are planning assumptions which will be confirmed or amended when the Settlement is released. However, the overarching trajectory of additional resources to fund pressures within local government is expected to be confirmed at that point. The Council's current position includes an expectation of a broadly flat core settlement compared with 2022/23, continuation of the 2022/23 Social Care Grant (£4.3m), continuation of the 2022/23 Services Grant (£5.6m) and new grant resources of £5m for Children's and Adults' social care made available as a result of the delay to Adult Social Care charging reforms.
  - The Council's accumulated £12m Council Tax and Business Rates Collection Fund surplus has been planned to be applied on a prudent medium term basis including £6.4m in 2023/24. In addition a combination of Council Tax base growth, lower than previously planned downward amendments and lower than previously planned Council Tax Support levels within 2022/23 and in future years indicate further resources being available from the Collection Fund (£2m), dampened slightly by a lower collection rate experienced recently. A further £3.1m above previous planning assumptions will be generated if the Council approved a Council Tax rise of just under 5% discussed above.
  - The Council will receive funding equivalent to a Business Rates multiplier inflationary increase linked to September 2022 Retail Prices Index increase of 12.6%. This position indicated in the Autumn Statement should represent resources of c£11.7m above the Council's budgeted resource level.
- 2.3 A number of expenditure and income pressures have created a revised budget gap over this period. The most significant of these individual pressures are outlined below:
- After many years of relatively low levels of inflation the Council now faces the impact of inflationary pressures that have emerged in 2022/23 and those expected to continue in 2023/24. This includes a forecast reflecting the 2022/23 pay award

(averaging c6%) and provision for a pay award of 4% in 2023/24. It also includes the effect of underlying inflation on energy and a range of its externally procured costs and services.

- The Adults' Social Care financial model is updated annually for the forecast cost of in-house and external services for adults and older people requiring support including assumptions about the living wage and price rises within external social care contracts.
- There are cost pressures reflecting the need to ensure an adequate workforce level within Children's Services. These include extending the Social Worker Academy; establishment growth to meet the case-holding demand levels and clinical supervision programme; and market supplements where the Council's rates are no longer competitive with comparable Local Authorities.
- Further budget provision is required to meet the current financial pressure of delivering the Council's waste services on the existing basis including the permanent financial impact of lost contractual and other income within the commercial waste service.

2.4 There are service technical savings, the most financially significant ones of which are as follows:

- The Council currently provides revenue funding for capital expenditure programmes relating to highways repairs and Information and Communications Technology (ICT). It is legitimate to fund this spend from capital resources at least on a time-limited basis. The proposal here is to fund the expenditure from capital receipts in 2023/24, providing a temporary £3m revenue saving.
- The Council is forecasting that it will receive a further £2m of revenue generated through the Coventry and Warwickshire Business Rates Pool which is expected to continue for one further year.
- The costs of early retirement and redundancy decisions are paid for from an existing revenue budget of £1m. Additional coverage is provided from a reserve balance. It is proposed to reduce the revenue budget to zero for one year and to fund all one-off exit costs from the reserve.
- A strategic review of property is in the process of optimising income levels in the commercial portfolio and optimise/rationalise the wider operational estate as necessary.

2.5 The net result of these changes would leave the Council with a balanced budget position in 2023/24 pending confirmation of the Government Settlement and refinement of key technical areas of the Council's budget such as the Council Tax and Business Rates Collection Fund and estimates of inflationary pressures. There is a high degree of certainty that a balanced position will be achieved.

Table 1: Financial Position 2023/24 to 2025/26

	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Initial Budget Gap	16,883	21,240	27,949
Resources	(38,437)	(24,081)	(22,081)
Expenditure and Income Pressures	30,736	38,353	43,695

Directorate and Technical Savings	(9,214)	(5,198)	(7,304)
<b>Budget Gap</b>	<b>(32)</b>	<b>30,314</b>	<b>42,259</b>

### Capital

- 2.6 The Council has a draft 5 year capital programme which totals nearly £352 million based on approved decisions and expected resource allocations. Of this, nearly c£120m is currently cash-flowed for 2023/24 taking into account an updated position for 2022/23.
- 2.7 The main components of the Council's provisional programme are set out below with the figures quoted representing the projected sums earmarked currently for 2023/24. The five year programme and an updated cash-flow position will be included in February's final Budget Report. The Programme includes:
- A strategic transportation programme in excess of £25m incorporating the City Region Sustainable Transport Settlement (CRSTS) programme, which is detailed in paragraph 2.8 below;
  - Continued delivery of the £31.5m Air Quality programme, which includes works at Junction 7 of the Ring Road and Spon End;
  - Completion of the £8.9m Binley Road Cycleway up to Walsgrave Hospital;
  - Commencement of delivering the Public Realm 6 programme;
  - City Centre Regeneration investment taking forward the city's Friargate District (building 2) and City Centre South plans;
  - Continued investment in the schools capital works including provision for the expansion of secondary places under their One Strategic Plan, to include the new SEND school proposal at Woodlands;
  - Continued investment in Adult and Children's Social Care in form of Disabled Facilities and Pathways to Care, along with the programme of vehicle replacement and ICT.
- 2.8 The CRSTS programme has been established by Government to provide a five year capital funding settlement for Mayoral Combined Authorities for transport, covering the period 2022-27. The West Midlands Combined Authority (WMCA) has been awarded £1.05 billion for the five year period. For Coventry, the following specific schemes are included in the WMCA's CRSTS programme as submitted to Government:
- Very Light Rail Regional Programme – total allocation of £71.7 million, of which £54.5million is specifically for the delivery of the Very Light Rail City Centre Demonstrator route within Coventry.
  - Park and Ride Estate Development – total allocation of £4.5 million which will include funding for the Tile Hill Station Park and Ride improvement scheme.
  - Foleshill Transport Package - £4.5 million allocation towards a package of transport improvements focussed on the Foleshill Road corridor.
  - Coventry South Sustainable Transport - £17 million allocation towards a package of transport improvements focussed on the London Road corridor supporting the Gigafactory and other developments planned for the Coventry Airport area and within the London Road corridor.
- 2.9 The draft programme will be subject to change between now and February with every expectation that some of the proposed expenditure will be shifted to later years. It is also important to be aware that some of the schemes involve a complex mix of funding sources, multi-partner delivery arrangements and challenging planning, technical and approval cocktails that do not always lend themselves to smooth project delivery progress. In overall terms, given the large amount of externally funded and driven proposals within the Council's

Capital Programme, it is very likely that a fair degree of flux will continue to be experienced in its cash-flow over the next few years.

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

- 3.1 The proposals in the report are subject to statutory consultation requirements. The Council will communicate the report's key messages through usual consultation channels including social and digital media.

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

- 4.1 This report includes a set of draft budget proposals and does not authorise spending and savings decisions. Following a public consultation period, full Council will consider the final budget proposals in February to be implemented from 1<sup>st</sup> April 2023. An indicative profile is set out in Appendix 1.

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

#### **5.1 Financial implications**

Following the overarching position set out in the Autumn Statement 2022, the Council's financial circumstances for 2023/24 and beyond will be clarified by the fine detail that will be set out in the forthcoming Provisional Settlement. In order to provide a planning base, this Pre-Budget Report includes estimates drawn from the Autumn Statement although this contains some degree of uncertainty.

Developments in relation to the system of local government finance proposed previously continue to be postponed. This affects the future of Business Rates Retention, reform of the Local Government funding allocation mechanism and the future of Business Rates pools and pilots. Given the recent history of delay in these areas it is difficult to have any certainty on their delivery or timing.

A number of local authorities have reported financial difficulties through 2022/23 due to a combination of pressure from their underlying financial position, the impact of rising inflation levels and, in a few cases, challenges caused by a failure of commercial ventures. Coventry has continued to maintain a stable financial position through this period by following a range of sound financial management practices including: implementing medium term planning which is not over-reliant on reserve contributions; making budgeting decisions that recognise fundamental pressures in the financial position; maintaining reserve balances at a level that is sufficient to manage budget risks; addressing issues of governance in decision making in line with external advice; pursuing financial planning approaches which do not place an over reliance on speculative commercial activity but which do incorporate a balanced and forward thinking approach to delivery of modest commercial gains; and embarking on a programme of activity driven by the forthcoming refreshed One Coventry Council Plan which will include at its heart effective delivery of services for Coventry citizens.

It is becoming clear that despite a recent history of robust financial management, the current financial environment is causing greater financial pressure on the Council. The Council's Medium Term Financial Strategy (MTFS) has been delayed and will be reported to Cabinet alongside the final Budget Report in February. It will provide greater coverage of the Council's approach to financial planning and addressing current issues. These continue to be difficult

times for local authorities and although the Council should now be able to identify a balanced position for 2023/24, there are significant gaps remaining over the medium term. In terms of future years, the Council will continue to use prudent assumptions to provide budgeting realism and help to maintain a focus on sound budget setting decision making going forward.

The financial position in Appendix 1 shows a balanced financial position in 2023/24 but then gaps of £30m and £42m over the following two years. In the period between now and February, the Council will update its forecasts as a result of the Local Government Finance Settlement and a small number of technical areas such as the Council Tax and Business Rates Collection Fund and the Asset Management Revenue Account. It is very unlikely that these will cause the bottom line position to worsen. However, this does not mean that the Council can afford to be complacent or plan on an optimistic basis for the medium term. Any such approach would run the risk of leaving future financial gaps with insufficient time to identify ways of addressing them. Any improvement in the 2023/24 position will enable the Council to re-profile one-off (Collection Fund) resources, currently assigned to 2023/24, into future years in order to reduce the medium term financial gaps.

In addition, the Council will approve a refined One Coventry Council Plan in 2023 and embark on a programme of activity aimed at meeting the key objectives of the Plan. As part of this programme the intention will be to identify more effective ways to deliver services, adopt cross cutting approaches, work with partners and the community and focus on key delivery metrics. No savings have been assigned to the programme at this stage but it is envisaged that it will be a key part of enabling the Council to deliver its financial as well as its performance targets in future years.

The Council's recent revenue and capital budgets have maintained a strong focus on helping Coventry become a growing and more prosperous city, both to help protect and increase key tax revenue streams and reduce the reliance of some local residents on Council services. In addition, the Council has adopted more commercial approaches to identify new and increased revenue streams. This will continue to be important as part of a balanced strategy which pays due regard to the risks and limitations inherent within them. The view of the Chief Operating Officer (the Section 151 Officer) is that the risk of occasional negative financial consequences of taking such approaches is lower than the risk of not pursuing them at all and failing to attract the sustained financial benefits that they offer.

The indicative level of the Capital Programme set out above is only a guide at this stage although it continues to point towards a significant programme of spend on capital schemes across the city. Much of this spend will continue to deliver benefits to the local economy through infrastructure improvements and enhancement of the city's appeal to private sector investment. The medium term trajectory of the Capital Programme does not reflect the high levels of expenditure experienced in recent years and will depend on the success of future grant bidding processes and announcements in relation to the Government's levelling up agenda and Shared Prosperity Fund.

## **5.2 Legal Implications**

The proposals in this report are designed to meet the Council's statutory obligations in relation to setting a balanced 2023/24 budget by mid-March 2023. This includes the duty to report to the Council on the robustness of the estimates provided and the adequacy of the financial reserves in place. Section 31A of the Local Government Finance Act 1992 and Section 25 of the Local Government Act 2003 refer.

## **6. Other implications**

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

The Council, in common with all local authorities, will continue to be faced with challenging resource constraints although the precise nature and trajectory of this are not yet clear. Individual proposals set out in this report demonstrate the Council's commitment is seeking to minimise impacts on front-line services. The Pre-Budget position is presented within the context of the existing Medium Term Financial Strategy, which is aligned with the priorities set out for the City within the Council Plan. In this way Pre-Budget proposals are aligned to existing policy priorities.

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

The inability to deliver a balanced budget is one of the Council's key corporate risks. The proposals within this report are aimed directly at trying to mitigate this risk. The new savings and income targets that will be included in the Council's bottom line budget position are unlikely to represent a significant risk of non-achievement. However, the continued budget gaps for future years will need to be addressed as part of the next budget process through 2023.

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

None of the new proposals set in Appendix 1 are likely to result in post deletions or service reductions. Measures for managing the financial gap based on current forecasts are set out in section 5 and any new savings proposals are unlikely to be put forward except as a last resort if the local government financial settlement is much worse than currently anticipated. Revenue gaps that need to be managed in later years mean that the Council will have to consider changes that might radically affect the way it works and the services it provides in the future.

### **6.4 Equalities / EIA**

An initial assessment is that the savings contained in this year's Pre-Budget report are unlikely to have any significant equality impacts. This position will be reviewed ahead of the final budget proposals being put forward in the new year, and any associated equality analysis will be carried out accordingly.

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

No impact at this stage although climate change and the environmental impact of the Council's decisions are likely to feature more strongly in the future.

### **6.6 Implications for partner organisations?**

There are little or no direct implications for partner organisations in the proposals although the One Coventry Plan may affect the way that the Council and its partners work together in future.

**Report author(s):**

**Name and job title:** Paul Jennings Finance Manager Corporate Finance

**Service:** Finance

**Tel and email contact:** 02476 977228 paul.jennings@coventry.gov.uk

Enquiries should be directed to the above person.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Directorate or organisation</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Lara Knight	Governance Services Coordinator	Law and Governance	24/11/22	29/11/22
Helen Williamson	Lead Accountant Capital	Finance	22/11/22	22/11/22
Sunny Heer	Lead Accountant	Finance	22/11/22	22/11/22
Phil Baggott	Lead Accountant	Finance	24/11/22	24/11/22
<b>Names of approvers for submission:</b> (officers and members)				
Finance: Barry Hastie	Chief Operating Officer	Finance	24/11/22	02/12/22
Legal: Sarah Harriott	Corporate Governance Lawyer	Law and Governance	24/11/22	28/11/22
Members: R Brown	Cabinet Member for Strategic Finance and Resources		28/11/22	02/12/22

This report is published on the council's website:

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

This page is intentionally left blank

**APPENDIX 1: PRE-BUDGET PROPOSALS AND FINANCIAL POSITION**

		2023/24 £000	2024/25 £000	2025/26 £000	
	<b>Starting Budget Gap</b>	<b>16,883</b>	<b>21,240</b>	<b>27,949</b>	<b>This position has been carried forward from 2022/23 Budget Setting and reflects all previously approved Budget changes</b>
<b>Resources</b>					
1	Local Government Settlement	0	0	0	This assumes no change to the resources position assumed at 2022/23 Budget Setting. The actual position will be determined within the overall 2023/24 Local Government Settlement and is subject to some forecasting uncertainty.
2	National Insurance Reversal	1,000	1,000	1,000	The Government has reversed the decision to increase Employer National Insurance which was due to become the Health and Social Care Levy from April 2023. The estimated impact of this change in Government grant has been matched by an equivalent expected reduction in costs included within the Savings section below.
3	Local Government Settlement - Lower Tier Services Grant	(591)	0	0	This assumes that the Lower Tier Services Grant continues at a level consistent with 2022/23. This will be determined within the overall 2023/24 Local Government Settlement.
4	Local Government Settlement - 2022/23 Services Grant	(5,574)	0	0	This assumes that the 2022/23 Services Grant continues at a level consistent with 2022/23. This will be determined within the overall 2023/24 Local Government Settlement.
5	SR2021 - 2022/23 Social Care Grant	(4,309)	(4,309)	(4,309)	This assumes that the 2022/23 Social Care Grant continues at a level consistent with 2022/23. This will be determined within the overall 2023/24 Local Government Settlement.

6	2023/24 Adults' and Children's Social Care Grant	(5,000)	0	0	Initial estimate of resources announced in the 2022 Autumn Statement to pay for social care, released as a result of the delay in Adult Social Care charging reforms.
7	New Homes Bonus	(800)	0	0	Initial estimate of New Homes Bonus assumed as a result of the 2022 Autumn Statement, subject to confirmation in the forthcoming the Provisional Settlement.
8	Business Rates Indexation	(11,672)	(11,672)	(11,672)	Current practice is for Council Business Rates revenue to be inflated each year by the September Retail Prices Index and this expectation has been confirmed in the Autumn Statement. The Council's financial plans have previously included an estimate of 1.5% compared to the actual figure of 12.6%. The difference is reflected here as additional unbudgeted revenue.
9	Council Tax & Business Rates Surplus Carry Forward	(6,391)	(4,000)	(2,000)	This assumes use of an uncommitted surplus within the 2021/22 Collection Fund outturn position reflecting a combination of Council Tax base growth, lower than budgeted downward amendments and lower than budgeted Council Tax Support levels.
10	Council Tax/Business Rates Collection Fund Including Proposed Council Tax Rise of 5%	(5,100)	(5,100)	(5,100)	This includes £3.1m additional revenue from raising Council Tax by just under 5% (including an Adult Social Care Precept of 2%) compared with the previous assumption of a 3% rise. It also assumes that further Collection Fund resources will become available reflecting a combination of Council Tax base growth, lower than previously planned downward amendments and lower than previously planned Council Tax Support levels within 2022/23 and in future years. Anticipated collection rates are expected to be lower than historical trends reflecting current economic circumstances and this has limited the extent of resource growth.
<b>Service &amp; Technical Pressures (and policy growth)</b>					

11	Inflation	14,300	16,700	16,700	This includes a forecast reflecting higher levels of inflation for 2 years including pay awards of 4% in 2023/24 and 3% in 2024/25 and increases across a range of energy and external contract budgets. It also assumes a return to a normalised inflation position from 2025/26 which is already built into the Council's future Budget.
12	Adults' Social Care - Inflation	6,642	11,055	15,257	The updated Adult Social Care Financial Model assessment contains inflation assumptions relating to the living wage and other price rises within external social care contracts. This includes the increase in the National Living Wage to £10.42 confirmed recently in the Autumn Statement.
13	Adults' Social Care - Demographic Growth	1,126	2,264	3,404	The updated Adult Social Care Financial Model assessment contains some expectations of demographic/service number growth.
14	Children's Social Care - Workforce	2,968	2,764	2,764	Children's Services has experienced significant workforce pressures, with high staff turnover and a high level of vacancies, caused by a shortage of social workers to meet the increased demand for children's services, accentuated by difficulties in recruiting agency staff to cover those vacancies. The strategy to stabilise the workforce includes extending the Social Worker Academy, establishment growth to meet the caseholding demand levels and clinical supervision programme. The workforce strategy also includes evaluating career pathways to promote staff development and retention as well as market supplements where the Council's rates are no longer competitive with comparable Local Authorities.
15	Legal Casework Capacity - Children's Social Care activity levels	400	200	200	The volume of legal casework for looked after children increased over the pandemic period and levels still remain high without any significant reduction. This makes provision in 2023/24 for current caseloads, and assumes caseload reduces slightly in subsequent years to reflect an ongoing process review
16	Housing Benefit Subsidy and Discretionary Housing Payments	1,500	1,500	1,500	Increased activity reflecting current trends and the current high cost of living environment. This is likely to affect the Council in several ways including pressure on the need for supported accommodation, additional non-reclaimable Housing Benefit subsidy and greater demand for Discretionary Housing Payments.
17	Refuse - Domestic	1,050	1,050	1,050	Budgetary provision for the current financial pressure of delivering the domestic refuse service.

18	Refuse - Commercial	500	500	500	Permanent financial impact of lost contractual and other income within commercial waste service resulting from the HGV driver industrial dispute in 2022
19	Legal Capacity	170	240	240	Increase in the additional employment costs within the wider legal service to reflect activity and retention
20	Insurance	500	500	500	This reflects significant unavoidable increases in insurance premiums and the transfer of schools to the Government's national Risk Protection Arrangement away from the Council's insurance service. This has led to a loss of school insurance contributions not matched by an equivalent reduction in insurance cost. The proposal here removes the resulting revenue shortfall and is planned to return insurance reserves, used to protect against insurance risk, to 75% of required level after 5 years.
21	Coroners	150	150	150	Inflationary cost increases over several years, particularly relating to histology and toxicology, together with the appointment of an area coroner have resulted in a cumulative financial pressure on the service which requires budgetary provision
22	Elections	225	225	225	The cost of elections in recent years have been funded from a combination of a small revenue budget and reserves built up historically. Reserves have now been fully utilised, so this provision reflects the average spend required on average each year to fund elections based on their existing cycle
23	Continuation of Coventry & Warwickshire Growth Hub Annual Funding	130	130	130	Coventry and Warwickshire Growth Hub plays a crucial role in providing the "front door" to the support available to businesses from CCC, other local providers and regional/national sources. Funding will be matched by Warwickshire County Council, and topped up by the Warwickshire Districts. Maintaining this investment is necessary to ensure businesses have access to business diagnostic support and our position as a lead partner in local business support continues, particularly in the current climate

24	School Transport	220	220	220	Following the collapse of a school bus route supplier during the pandemic the Council picked up and contracted for new provision for several key dedicated school bus routes without existing budget, although originally funded from grant. The routes have been rationalised to a lower level but these remaining ones represent the 5 dedicated routes into Bishop Ullathorne Secondary school. Due to the location of the school, local transport infrastructure would likely be significantly impacted by the removal of these busses. We also provide a small subsidy to extend a public transport route into Blue Coat Secondary school. These transport costs are currently unfunded.
25	CitiVision	35	35	35	Previous budget decision to make a saving by reducing the number of issues and number of pages in CitiVision magazine. Subsequently part of this decision was reversed by increasing the number of issues again. To keep down costs the previously 24-page publication is now an 8-page but significant increases in costs of paper, printing and delivery mean the cost of producing the shorter document is almost the same.
26	SEN Transport	500	500	500	As is being seen nationally the number of SEND pupils within Coventry continues to grow. This results in a continuing increase in the number of commissioned special school placements, and consequently more children and young people requiring specialist transportation to school, including transport to schools outside of the city due to local special school provision being full. Additionally there have been increases in SEND transport demand due to more post-16/19 students remaining in education.
27	Culture & Sport Legacy Capacity	320	320	320	Following the City of Culture and Commonwealth games during 2021 and 2022, staffing capacity is sought to capitalise on the year in the spotlight to ensure the delivery of a lasting legacy, whereby cultural and sporting assets, opportunities and benefits created in the city are progressed for the benefit of future generations
<b>Service and Technical Savings</b>					
28	Commercialisation Programme	(500)	(1,000)	(1,500)	Primarily Regional Materials Recycling Facility benefits including commercial loan margin, reduced waste disposal haulage costs, and gate fee savings.

29	Strategic Property Review	(1,000)	(1,700)	(1,700)	A strategic review of property has been under way which is in the process of optimising income levels in the commercial portfolio, and reviewing the wider operational estate to optimise/rationalise as necessary following the pandemic.
30	Car Parking Tariffs	(150)	(150)	(150)	Car Parking Tariffs have not been reviewed since 2017. Parking numbers have recovered partially to pre covid levels to what is expected to be a new norm. It is proposed to increase fees by an average of 5% which would generate £150k per year ongoing
31	Utilisation of closed car park sites	(100)	(100)	(100)	There are a few currently unutilised car parks which were closed during the pandemic to reduce operating costs. This proposes their repurposing specifically as commercial parking to companies in the city centre
32	Childrens Pathways to Care Programme	(100)	(100)	(100)	The option exists to reduce the capital funding set aside annually to support allocations from the 'Pathways to Care' policy (fostering and adoption exceptional payments). Any high costs requests may not be able to be approved which could impact placement options/ placement stability/ permanence.
33	Childrens Internal Residential Homes Strategy	0	(350)	(875)	Following the success of the Internal Residential Homes model approved in 2017, this Residential Strategy will be to open further Internal residential homes for children looked after, allowing both improved outcomes for young people as well as the financial benefits delivered via a reduced reliance on private external market providers.
34	National Insurance Reversal	(1,000)	(1,000)	(1,000)	The Government has reversed the decision to increase Employer National Insurance which was due to become the Health and Social Care Levy from April 2023. The estimated impact of this change on the Council's costs has been matched by an equivalent expected loss of Government grant included within the Resources section above.
35	Organisational Exit Costs	(1,000)	0	0	The costs of early retirement and redundancy decisions are paid for from an existing revenue budget of £1m. Additional coverage is provided from a reserve balance. It is proposed to reduce the revenue budget to zero for one year and to fund all one-off exit costs from the reserve.
36	Asset Management Revenue Account	(500)	0	0	The Asset Management Revenue Account contains a number of elements which are subject to forecasting uncertainty. This proposal anticipates some minor budgeting flexibility around areas including loan interest, Minimum Revenue Provision, capitalisation of interest and short-term investment income.

37	Coventry and Warwickshire Business Rates Pool	(2,000)	0	0	The Pool is now expected to continue for a further year within the existing Local Government Finance regime which will enable this income stream to be achieved for a further year.
38	Dividends from Council Shareholdings	136	(798)	(1,879)	Revised profile of dividends from the Council's shareholdings in external companies including Birmingham Airport and the Coventry and Warwickshire Waste Disposal Company. This includes improved dividends compared to the profile in recent years affected by Covid.
39	Capital Programme Revenue Funding	(3,000)	0	0	Current capital programme schemes within highways and ICT are funded from revenue resources. This proposal instead funds this expenditure from time-limited capital receipts which releases a temporary revenue saving, planned here for one year.
	<b>Budget (Surplus)/Deficit</b>	<b>(32)</b>	<b>30,314</b>	<b>42,259</b>	

#### Summary

Starting Position	16,883	21,240	27,949
Resources	(38,437)	(24,081)	(22,081)
Service & Technical Pressures	30,736	38,353	43,695
Service and Technical Savings	(9,214)	(5,198)	(7,304)
	<b>(32)</b>	<b>30,314</b>	<b>42,259</b>

This page is intentionally left blank



---

Cabinet  
Audit and Procurement Committee

13<sup>th</sup> December 2022  
30<sup>th</sup> January 2023

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

**Director Approving Submission of the report:**

Chief Operating Officer (Section 151 Officer)

**Ward(s) affected:**

City wide

**Title:**

2022/23 Second Quarter Financial Monitoring Report (to September 2022)

---

**Is this a key decision?**

No

---

**Executive Summary:**

The purpose of this report is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and the Council's treasury management activity as at the end of September 2022. The headline revenue forecast for 2022/23 is for net expenditure to be **£11.3m** over budget. At the same point in 2021/22 there was a projected overspend of £3.1m.

The Council continues to face budget pressures due to increased volumes and higher costs of placements within Children's Services and costs incurred due to the previous refuse drivers' industrial dispute within Streetscene and Regulatory Services. A range of other smaller but still significant overspends are also being reported in several other services including Legal and Governance Services and Business, Investment and Culture.

As reported at Quarter 1, significant additional costs are also being faced due to inflationary pressures affecting the Council, with the approved local government pay award and costs affecting contracts for energy and social care amongst others. The in-year and ongoing impact of these inflationary pressures is a serious factor affecting the Council's ability to manage its budgetary position.

The Council's capital spending is projected to be £165.8m and includes major schemes progressing across the city. The size of the programme and the nature of the projects within it continue to be fundamental to the Council's role within the city. There is limited evidence that inflationary pressures referenced above on capital projects this year and the assumption is that stand-alone projects that are already in-progress will be delivered as planned. It is more likely that future projects that have

not yet started may need to be re-evaluated to determine their deliverability within previously defined financial budgets.

The Council's services have moved to a business as usual position with activity and impacts arising from the Covid pandemic having reduced significantly. Some pockets of service activity continue to be affected but this is not resulting in a large financial cost. The Council does not expect to receive any Government support linked to Covid within the 2022/23 financial year.

The emerging inflationary risks facing the Council and the wider local government sector have renewed the imperative to maintain financial discipline and prioritise the Council's medium-term financial position. This will be a key focus of the Council's activities over the remainder of the year and several key measures are set out in section 5 to help minimise the size of any budgetary overspend.

### **Recommendations:**

The Cabinet is requested to:

- 1) Approve the Council's revenue monitoring position.
- 2) Approve the revised forecast capital outturn position for the year of £165.8m incorporating: £0.3m net increase in spending relating to approved/technical changes, £0.6m net overspend and £0.8m of net rescheduling of expenditure into future years.
- 3) Approve the use of corporate capital receipts to fund the £0.6m Public Realm 5 overspend as referenced in section 5 and Appendix 4

The Audit and Procurement Committee is requested to:

- 1) Consider the proposals in the report and forward any recommendations to the Cabinet.

### **List of Appendices included:**

Appendix 1 - Revenue Position: Detailed Directorate breakdown of forecast outturn position  
Appendix 2 - Capital Programme: Analysis of Budget/Technical Changes  
Appendix 3 - Capital Programme: Analysis of Rescheduling  
Appendix 4 - Capital Programme Analysis of Over/Under Spend  
Appendix 5 - Prudential Indicators

### **Background papers:**

None

### **Other useful documents**

None

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

No

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

Yes - Audit and Procurement Committee, 30<sup>th</sup> January 2023

**Will this report go to Council?**

No

**Report title:**

2022/23 Second Quarter Financial Monitoring Report (to September 2022)

**1. Context (or background)**

- 1.1 Cabinet approved the City Council's revenue budget of £237.4m on the 22nd February 2022 and a Directorate Capital Programme of £145.1m. This is the second quarterly monitoring report for 2022/23. The purpose is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and to report on the Council's treasury management activity.
- 1.2 The current 2022/23 revenue forecast is for expenditure to be £11.3m over budget. There is no proposal to apply any Covid related funding at this stage. The reported forecast at the same point in 2021/22 after adjusting for Covid-related funding was an overspend of £3.1m. Capital spend is projected to be £165.8m.
- 1.3 It is not unusual for the revenue position to reflect a forecast overspend at this stage which then improves over the course of the year. However, this is a high figure by historical standards and represents a serious cause for concern for the Council. Section 5 of the report sets out the Council's proposed approach to managing the position although as a final backstop it should be noted that the Council maintains a strong balance sheet in-part to protect itself from circumstances such as this.

**2. Options considered and recommended proposal**

- 2.1 This is a budget monitoring report and as such there are no options.

**Revenue Position** - The revenue forecast position is analysed by service area below.

**Table 1 - Forecast Variations**

<b>Service Area</b>	<b>Revised Net Budget</b>	<b>Forecast Spend</b>	<b>Total Over/ (Under) Spend</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>
Adult Services & Housing	97.3	97.8	0.5
Business Investment & Culture	5.6	7.8	2.2
Children & Young People's Services	84.8	88.8	4.0
Contingency & Central Budgets	(13.7)	(23.0)	(9.3)
Education and Inclusion	18.7	19.2	0.5
Finance & Corporate Services	6.2	6.9	0.7
Human Resources	1.3	1.8	0.5
Legal & Governance Services	4.4	5.5	1.1
People Directorate Management	1.2	1.2	0.0
Project Management & Property Services	(6.7)	(5.4)	1.2
Public Health	0.4	0.0	(0.5)
Streetscene & Regulatory Services	29.9	38.6	8.6
Transportation & Highways	7.9	9.7	1.7
<b>Total</b>	<b>237.4</b>	<b>248.7</b>	<b>11.3</b>

- 2.2 An explanation of the major forecast variances is provided below. Further details are provided in Appendix 1 to the report.

### **Services**

Children and Young People's Services continues to report a significant overspend linked to circumstances exacerbated by the pandemic. Of the overall £4m overspend, £2.1m is caused by both the total number of placements and the sufficiency of the market to meet the needs of young people in care impacting the average unit cost of those placements. There are also significant concerns regarding staffing, accounting for a further £1.9m overspend caused by issues surrounding recruitment and retention as well as a shortage of agency social workers to fill roles needed to meet the growing demand in casework.

Within Streetscene & Regulatory Services, the vast majority of the overspend relates to the combined impact on Domestic and Commercial Refuse collection services of the HGV driver strike and strike mitigation costs. During the period of industrial action, significant additional costs of providing both waste drop sites and latterly the collection of kerbside waste through a third party provider (TWW) have been incurred. This together with lost contractual income within the commercial service has resulted in a net combined pressure of c£7.2m. The dispute has now been resolved such that strike mitigation pressures will not continue into 2023/24. However, the net contractual income lost within the commercial service will result in a more lasting financial impact as many clients have sought collection services from other providers.

Within Property, Transport and Highways, and Business Investment & Culture, there are significant inflation pressures reported for operational properties and street lighting energy totalling £2.2m, as costs are forecast to rise sharply from October 2022 reflecting national and global pressures. The energy market is currently very volatile and further increases may be seen which would also impact materially on 2023/24 and beyond. In addition, the running costs of the Collection Centre building being kept operational during the City of Culture year and until construction starts are resulting in a pressure of £1.3m, the vast majority of which relates to business rates.

### **Contingency and Central Budgets**

An overall underspend of £9.3m incorporates favourable variances of £4.4m in the Asset Management Revenue Account (AMRA) and £4.9m across all other contingency budgets. The AMRA variation incorporates higher than budgeted interest income from loans provided by the Council plus higher than budgeted investment income which is due to a combination of larger short-term investment balances and higher interest rates. In addition to inflationary impacts reported within individual services, central budgets include the cost of the expected 2022/23 pay award which averages c6% for the Council and represents a cost c£6m above the original budget. This is offset in part by other contingency budgets. Favourable variations including a Business Rates Pool surplus (£2m) and lower than budgeted superannuation costs (£2.1m). These can be volatile and difficult to predict budgets and the quarter 2 forecasts are towards the favourable end of the reasonable range of outcomes meaning that any further flexibility later in the year within these areas will be relatively limited.

### **2.3 Capital**

The quarter 2 2022/23 capital outturn forecast is £165.8m compared with the first quarterly outturn of £165.3m. Table 3 below updates the budget at quarter 2 to take account of a £0.3m new approved/technical changes, £0.8m of rescheduling now planned to be carried forward into future years and an overspend of £0.6m

The resources available section of Table 3 explains how the Capital Programme will be funded in 2022/23. It shows 76% of the programme is funded by external grant monies, whilst 13% is funded from borrowing. The programme also includes funding from capital receipts of £10.7m.

**Table 3 – Movement in the Capital Budget**

CAPITAL BUDGET 2022-23 MOVEMENT	Qtr 2 Reporting £m
Quarter One Estimate Outturn	165.6
Approved / Technical Changes (see Appendix 2)	0.3
“Net” Rescheduling into future years (See Appendix 3)	(0.8)
“Net” Overspend	0.6
Revised Estimated Outturn 2022-23	165.8

RESOURCES AVAILABLE:	Qtr 2 Reporting £m
Prudential Borrowing (Specific & Gap Funding)	21.5
Grants and Contributions	126.5
Capital Receipts	10.2
Revenue Contributions and Capital Reserve	7.6
Total Resources Available	165.8

The inflationary pressures affecting the Council’s revenue budget are also present within capital schemes although the pattern with which this takes affect can be different due to the way in which expenditure is incurred. It is likely that most stand-alone projects that are already in-progress will be delivered within existing agreed contractual sums. However, some future projects that have not yet started may need to be re-evaluated to determine their deliverability within previously defined financial budgets. In addition, where budgets have established to deliver programmes of expenditure, it is likely that these programmes may need to be reduced in size over time reflecting higher prices.

## 2.4 Treasury Management

### Interest Rates

The Monetary Policy Committee (MPC) continues to raise interest rates in a bid to combat growing inflation. The invasion of Ukraine continues to exacerbate global inflation trends, particularly around food and energy. The rise in energy and fuel prices has been a significant factor behind the UK Consumer Price Index (CPI) rate exceeding 10%. Base Interest Rate increased to 3.00% at the MPC 3<sup>rd</sup> December 2022 meeting. The current market forecasts the base rate will continue to rise to 4.75% next year after which it should flatten out.

### Long Term (Capital) Borrowing

The net long-term borrowing requirement for the 2022/23 Capital Programme is £7.1m, taking into account borrowing set out in Section 2.3 above (total £21.5m), less amounts to be set aside to repay debt, including non PFI related Minimum Revenue Provision (£14.4m). The Council has no immediate need to take any further new long-term borrowing although this will continue to be kept under review.

The Public Works Loan Board (PWLB) is the main source of loan finance for funding local authority capital investment. In August 2021 HM Treasury significantly revised guidance for the PWLB lending facility with more details and 12 examples of permitted and prohibited use of PWLB loans. Authorities that are purchasing or intending to purchase investment assets primarily for yield will not be able to access the PWLB except to refinance existing loans or externalise internal borrowing. Under the Treasury Management Strategy 2022/23 approved by Cabinet on 22 February 2022 it was agreed the Council will not purchase investment assets primarily for yield.

Interest rates for local authority borrowing from the Public Works Loans Board (PWLB) have risen in recent times as government gilt yields have increased. Between 1<sup>st</sup> April and 30 September 2022 PWLB rates have varied within the following ranges:

<b>PWLB Loan Duration (maturity loan)</b>	<b>Minimum 2022/23 to Q2</b>	<b>Maximum 2022/23 to Q2</b>	<b>As at the End of Q2</b>
5 year	2.38%	5.64%	5.31%
50 year	2.45%	5.71%	4.39%

The PWLB allows qualifying authorities, including the City Council, to borrow at 0.2% below the standard rates set out above. This “certainty rate” initiative provides a small reduction in the cost of future borrowing.

Regular monitoring continues to ensure identification of any opportunities to reschedule debt by early repayment of more expensive existing loans replaced with less expensive new loans. The premiums payable on early redemption usually outweigh any potential savings.

### **Short Term (Temporary) Borrowing and Investments**

The Council’s 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. There has not been any short-term borrowing over the last twelve months.

Returns provided by the Council’s short-term investments yielded an average interest rate of 1.98% over the last 12 months. This rate of return reflects low risk investments for short to medium durations with UK banks, Money Market Funds, Certificates of Deposits, other Local Authorities, Registered Providers and companies in the form of corporate bonds. Returns have slowly begun to increase as interest rates rise. Dependent on daily levels of cash available this will lead to an increase in income for the Council

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

	<b>As at 31st March 2022</b>	<b>As at 30<sup>th</sup> June 2022</b>	<b>As at 30<sup>th</sup> Sept 2022</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>
Banks and Building Societies	0.0	0.0	1.5
Local Authorities	0.0	15.0	0.0
Money Market Funds	18.3	41.85	35.6
Corporate Bonds	0.0	0.0	0.0

HM Treasury	19.0	0.0	16.8
<b>Total</b>	<b>37.3</b>	<b>56.85</b>	<b>53.9</b>

### External 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. The pooled funds are generally AAA rated; are highly liquid, as cash can be withdrawn within two to four days; and have a short average duration. These investments include Certificates of Deposit, 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 risk these investments are spread across several funds (CCLA, Schroders, Ninety-One Investec, Columbia Threadneedle and M&G Investments).

Returns provided by the Council’s pooled funds yielded an average interest rate of 4.15% over the last 12 months. As at 30<sup>th</sup> September 2022 the funds were valued at £28.7m (£30.4m at 30 June 2022), against an original investment of £30m. Of the seven pooled funds, only the CCLA Property Fund is in surplus (£1.4m), which leaves six funds currently showing a deficit in value (ranging from £0.3m to £0.7m). Financial markets are very volatile at the moment so capital values are particularly variable. These investments continue to provide a good rate of return but capital values will be monitored closely. There remains an expectation that the full value for each pooled fund will be recovered over the medium term - the period over which this type of investment should always be managed. Current accounting rules allow any ‘losses’ to be held on the Council’s balance sheet and not counted as a revenue loss although this is due to be reviewed in April 2023.

### Prudential Indicators and the Prudential Code

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

The indicators, together with the relevant figures as at 30 September 2022 are included in **Appendix 5** to the report. This highlights that the City Council’s activities are within the amounts set as Performance Indicators for 2022/23. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 30 September 2022 the value is -£78.2m (minus) compared to +£94.9m 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 30 September 2022 the value is £236.2m compared to £474.4m within the Treasury Management Strategy, reflecting that a significant proportion of the Council’s investment balance is at a fixed interest rate.

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. The total combined limit was revised by Council on 18<sup>th</sup> October 2022 in the light of the approval of the Tom White Waste Materials Recycling Facility. The limit for 2022/23 is £146m, against which there are forecast commitments of £139.3m: -

	Limit	Actual 31st March 2022	2022/23 Committed and Planned	Total	Headroom
	£m	£m	£m	£m	£m
Shares	55.0	52.0	0.0	52.0	(3.0)
Loans	91.0	41.9	45.4	87.4	(3.6)
	<b>146.0</b>	<b>93.9</b>	<b>45.4</b>	<b>139.3</b>	<b>(6.7)</b>

The committed or planned total of £45.4m includes some loan facilities to lend c£9.6m, which may not necessarily be taken up, although the Council is committed to provide the funds if requested.

### 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 Chief Operating Officer (Section 151 Officer) and the Chief Legal Officer

#### 5.1 Financial implications

##### Revenue

The Quarter 2 position reflects a serious position for the Council which has worsened from the £9.5m revenue overspend forecast at Quarter 1. External factors, in particular inflationary pressures, represent a large part of the position presented and will have an impact on the Council beyond the current financial year. There are other intractable on-going issues including those relating to children's social care which are common to many councils across the country whilst the Council is also managing local time-limited pressures in the current year. There is now a strong possibility that the Council will not be able to balance its revenue position by year-end.

The timing of the surge in inflation meant that it was not anticipated in the Council's 2022/23 Budget process. Although the Council budgets prudently for inflationary costs the acceleration in rising prices and pay award assumptions which together represent a cost of c£16m, exceed the budgetary provision available by c£8m. The pay assumptions reflect the recently agreed pay offer. The rise in energy prices can be observed in terms of the cost to the Council's property estate and costs within the city's street lighting energy bills. These problems will continue into 2023/24 and could represent a worsening threat depending on the future trajectory of inflation.

Despite further increases to Children's Services' budgets for 2022/23, the demand and overall cases in Children's Services continues to rise in the city leading to continued high agency social worker levels and high external placement costs. The refuse drivers' dispute has led to costs being incurred well into the second quarter of the year although the ending of the dispute should ensure that no further budgetary overspends are incurred on this issue. However, a wide range of other challenges continue to be reported in Appendix 1 which, together with the issues reported above, provide a difficult financial picture despite the flexibility identified with corporate and central budgets.

The position reported does not highlight specific costs or income loss attributable to Covid. Any such residual impacts such as higher levels of looked after children, subdued car park income and lower dividend levels, are now being treated as reflecting a new normal rather than extra-ordinary Covid impacts. As a result, no funding has been assumed from the relevant reserves at this stage.

Although this is the most difficult in-year position that it has faced for some years, the Council is well placed to manage the short term impact and has taken appropriate action to minimise any in-year budgetary variation: controls have been put in place to limit recruitment to vacant posts based on specific criteria (for instance, where posts are needed to meet statutory requirements, provide direct care or are social work related, meet health and safety requirements or where posts are funded from external monies or specific income or revenue streams); services have been instructed to avoid/delay expenditure decisions and to alleviate budgetary pressures or deliver positive variances through management of controllable expenditure.

If the Council's budgetary position reflects usual trends there should be some natural improvement to the overall bottom over the second half of the year. It remains possible that further limited flexibility may become available within Corporate budgets including forecasts of inflationary impact where it is difficult to know whether they will materialise as set-out. The Council has maintained some flexibility in the form of previous grant funding and reserve balances which it can consider using to manage within specific service areas. In overall terms the Council has taken steps to ensure that it has a strong balance sheet position, including robust reserve balances, which as a measure of last resort provides protection against unexpected adverse budget variations.

The action outlined above and the further provision in place gives sufficient assurance that the Council can manage the financial position outlined. However, the underlying position for 2023/24 will be very challenging and any one-off resources required to balance 2022/23 will weaken the Council's flexibility ahead of the forthcoming Budget process. On this basis it remains a strong imperative to move towards a balanced 2022/23 position to maximise the flexibility available to the Council to be able to manage its medium term financial position which is likely to come under severe pressure without further support from Government.

In December 2020, Cabinet endorsed an approach of providing appropriate support to local citizens by passing on specific ring-fenced funding to manage the social and economic impacts of Covid. In September 2022, the Council received a £3.2m extension to the nationally distributed Household Support Fund (HSF), a legacy scheme from the previous Covid Winter Grant and the Local Support Grant. The HSF is intended to provide support over October 2022 to March 2023 to Coventry households who are most in need of support with the significantly rising cost of living. This fund is being distributed in-line with the key aims of the previous HSF schemes, with priority being given to supporting vulnerable households with the costs of food, energy and other related essentials. The demand for this type of support has continued to grow through 2022 as Coventry citizens have been affected by the increase in the cost of living. Despite the extension to the scheme, it is clear that it will not be

possible to meet 100% of demand and it will be necessary to prioritise its distribution to focus on the most vulnerable citizens and the greatest needs.

### **Capital**

The Council's Capital Programme continues to include a range of strategically important schemes across the city. This continues to be a large mostly grant funded programme continuing the trend of recent years. The programme includes major scheme expenditure on secondary schools' expansion, the second Friargate building, the Air Quality programme, the Housing Infrastructure Fund works, City Centre South and support to the Friargate Hotel development.

Appendix 4 references the projected final outturn position on one of the Council's strategically important and high profile projects. The Public Realm 5 project has now been completed with final contract costs having been settled it is reporting an overspend of £0.6m against programme funding of c£44m. The project has been complex and was delivered in the face of adverse conditions, not least the pandemic period. Notwithstanding that, the costs require additional funding which is proposed will be met from corporate capital receipts

### **Legal implications**

None

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

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

The need to deliver a stable and balanced financial position in the short and medium term is a key corporate risk for the local authority and is reflected in the corporate risk register. A recent reassessment indicates that the Council now faces an increased level of risk in this area. Good financial discipline through budgetary monitoring continues to be paramount in managing this risk and this report is a key part of the process. It is vital that Council officers and members are aware of the current financial challenge and the measures planned for the second half of the year to address this. This in turn will dictate the extent to which the bottom line can move closer towards a balanced position.

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

It remains important for the Council to ensure that strict budget management continues to the year-end.

### **6.4 Equalities / EIA**

No impact.

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

No impact at this stage although climate change and the environmental impact of the Council's decisions are likely to feature more strongly in the future.

**6.6 Implications for partner organisations?**

No impact.

**Report author(s):****Name and job title:** Paul Jennings Finance Manager Corporate Finance**Service:** Finance**Tel and email contact:** 02476 977228 paul.jennings@coventry.gov.uk

Enquiries should be directed to the above person.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Directorate or organisation</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Lara Knight	Governance Services Coordinator	Law and Governance	11/11/22	18/11/22
Helen Williamson	Lead Accountant Capital	Finance	31/10/22	7/11/22
Michael Rennie	Lead Accountant (Business Partner)	Finance	31/10/22	7/11/22
Claire Maddocks	Lead Accountant (Financial Systems)	Finance	31/10/22	7/11/22
Mike Revis	Lead Accountant (Control and Treasury)	Finance	31/10/22	7/11/22
<b>Names of approvers for submission: (officers and members)</b>				
Finance: Barry Hastie	Chief Operating Officer	Finance	11/11/22	11/11/22
Legal: Sarah Harriott	Corporate Governance Lawyer	Law and Governance	11/11/22	21/11/22
Members: R Brown	Cabinet Member for Strategic Finance and Resources		21/11/22	21/11/22

This report is published on the council's website:  
[www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)

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

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

<b>Service Area</b>	<b>Revised Net Budget</b>	<b>Forecast Spend</b>	<b>Centralised Variance</b>	<b>Budget Holder Variance</b>	<b>Total Variance</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
Adult Services & Housing	97.3	97.8	-1.4	1.9	0.5
Business Investment & Culture	5.6	7.8	0.4	1.8	2.2
Children & Young People's Services	84.8	88.8	-1.0	5.0	4.0
Contingency & Central Budgets	-13.7	-23.0	0.0	-9.3	-9.3
Education and Inclusion	18.7	19.2	-0.7	1.2	0.5
Finance & Corporate Services	6.2	6.9	-0.3	1.0	0.7
Human Resources	1.3	1.8	0.3	0.2	0.5
Legal & Governance Services	4.4	5.5	-0.4	1.5	1.1
People Directorate Management	1.2	1.2	-0.1	0.2	0.0
Project Management & Property Services	-6.7	-5.4	0.3	0.9	1.2
Public Health	0.4	-0.0	-0.0	-0.5	-0.5
Streetscene & Regulatory Services	29.9	38.6	-0.1	8.7	8.6
Transportation & Highways	7.9	9.7	-0.4	2.1	1.7
<b>Total</b>	<b>237.4</b>	<b>248.7</b>	<b>-3.4</b>	<b>14.7</b>	<b>11.3</b>

## Budget Holder Forecasts

Service Area	Reporting Area	Explanation	£m
Education and Skills	SEND & Specialist Services	There is continued pressure on SEN transport due to increased demand from post 16/19 students, inflationary pressures and additional out of city taxi's resulting from in city special schools being full. There are also a number of taxis operating across the city which are being used due to in-house routes being full. There continues to be pressure on staffing due to driver and escort sickness resulting in having to find alternative means for pupils to get to school when routes are closed. E Auction is still being used but this is not producing the savings that had been predicted. Work continues to validate the forecast and review options to reduce costs.	0.4
Education and Skills	Education Entitlement	The underspend is largely a result of a reduced cost on school bus passes. The number of pupils eligible for bus passes is based on statutory criteria and policy. A new online system introduced by the bus companies now means that where passes are not used charges are not incurred.	(0.2)
Education and Skills	Education Improvement & Standards	The forecast includes a £250k pressure relating to dedicated school transport, which is a result of fall out of a DfE grant that was funding a number of dedicated school transport routes. Work has already taken place to reduce this pressure in 22/23 and will continue for the 23/24 financial year. An underspend on historic pension liability is partly offset against an overspend on school trade union facility time.	0.2
Education and Skills	Employment & Adult Education	Employment are forecasting a reduction in expenditure of £0.5m against centralised salaries. They are also forecasting a corresponding reduction in related income of £0.2m plus an increase in non-salary related expenditure of £0.2m giving a budget holder variance of £0.4m. At service level this leaves a small net underspend.	0.6
Education and Inclusion	Other Variances Less than 100K		0.2
<b>Education and Skills</b>			<b>1.2</b>
Children and Young People's Services	Children's Services Management Team	There is a budgetary pressure in the Social Worker Academy linked to staffing a second team to increase the amount of Newly Qualified Social Workers we can recruit into the service. This cost is being offset by a planned underspend on financial strategy.	(0.6)
Children and Young People's Services	Commissioning, QA and Performance	Safeguarding training income is £79k below the budgeted target, also the Professional Support Service saving target of £53k has not been met. Agency spend on Independent Reviewing Officer's and Child Protection Chairs is £203k overspent due to pressures caused by vacancies and increasing caseloads	0.4
Children and Young People's Services	Help & Protection	There is a budgetary pressure of £1.8m in the Area Teams linked to staff costs, with high levels of cases across the service and the need to use agency staff, including a specialised project team.	2.3

		There is a further budgetary pressure of £0.3m in LAC legal costs linked to high levels of demand. These are currently being offset by additional Youth Offending Service Grants, which will support new activity once the plan is signed off.	
Children and Young People's Services	LAC & Care Leavers	<p>There is a forecast overspend on looked after children's (LAC) placements of £1.9m. This is being caused by both the total number of placements and the sufficiency of the market to meet the needs of young people in care impacting the average unit cost of those placements.</p> <p>There is a further budget pressure of £0.6 million due to the staffing challenges within LAC permanency service and the need for a task force to ensure that care proceedings continue to be progressed.</p> <p>LAC transport has a forecast overspend of £0.25 million and this is as a result of placement arrangements where transport needs to be provided for children to continue in current education provision. Work is on-going to improve sufficiency of local placements which will start to address this pressure.</p> <p>There is a further budgetary pressure of £0.25m within the Children's disability service. This overspend relates to one child where a large package of support was put into their family home in the absence of a suitable residential home.</p> <p>These overspends are offset by an increase in income from central government for unaccompanied asylum seeking children, as well as current forecast underspends on Supported Accommodation.</p>	2.9
<b>Children and Young People's Services</b>			<b>5.0</b>
Adult Social Care	Strategic Commissioning (Adults)	£0.2m underspend relates to transport as a result of continued reduced demand for day opportunities. £0.6m underspend relates to New Homes for Old PFI due to additional client fee income.	<b>(0.8)</b>
Adult Social Care	Adult Social Care Director	The underspend represents an increase in the amount of iBCF and other resources that are drawn down to contribute to the overall budget position. This does mean there is less flexibility and therefore increased risk of overspends in subsequent years. This has been offset by forecast increases in bad debt provision (£0.5m).	(1.8)
Adult Social Care	Partnerships and Social Care Operational	Overspends relating to additional agency costs which have partly been offset by centralised underspends due to staff vacancies.	0.3
Adult Social Care	Localities and Social Care Operational	Overspends relating to additional agency costs have been offset by centralised underspends due to staff vacancies.	0.3
Adult Social Care	Community Purchasing Mental Health	Spend continues to increase for Mental Health and there has been increasing numbers of people placed in more expensive bed based packages. This is further impacted by a reduction in Hospital Discharge grant of £1.2m at a time when discharge capacity is still impacted by COVID.	1.8

Adult Social Care	Community Purchasing Other	see above - Community purchasing spend is managed at an overall level and the explanation above covers both Community Purchasing Mental Health and Community Purchasing Other	1.7
Adult Social Care	Mental Health Operational	There remains significant pressures in Deprivation of Liberty Assessment demand leading to additional assessment costs (£0.3m).	0.3
Adult Social Care	Other Variances Less than 100K		0.1
<b>Adult Social Care</b>			<b>1.9</b>
Legal & Governance Services	Legal Services	There is a significant pressure within legal services due to the cost of agency and external staff. The pressure relates to both recruitment and retention difficulties, and extra workload primarily in children's social care as an ongoing impact of COVID-19. There is an action plan in place to address these issues but the full benefit will not materialise immediately.	1.2
Legal & Governance Services	Coroner & Register Office	There is an underlying pressure within the coroner's service as a result of cost increases over a number of years. This has been exacerbated by COVID-19 which is continuing to increase the costs of particular external services e.g. pathology	0.2
Legal & Governance Services	Democratic Services	Additional resource required to manage subject access requests whilst a permanent solution is investigated to manage and process the significant number of complex and large cases.	0.1
<b>Legal &amp; Governance Services</b>			<b>1.5</b>
Finance & Corporate Services	Revenues and Benefits	There is a gross £0.5m pressure within the discretionary hardship payments (DHP) scheme due to a 30% reduction in grant funding combined with an increase in demand for services. There is also a net Housing Benefit subsidy pressure of £0.4m caused by an increase in the volume and price of supported accommodation, for which the Council only receives partial subsidy payments if the provider is not a registered social landlord. These are offset by a contribution from reserves of £0.2m. In addition there are increased temporary staffing costs (circa £0.3m) as the service deals with the residual work from the Test and Trace payment scheme, the resultant build-up of work in the back office and the ongoing administration of the energy rebate scheme.	1.0
<b>Finance &amp; Corporate Services</b>			<b>1.0</b>
Human Resources	HR and Workforce Development Management	The Budget Holder variance relates to delays in achievement of a savings target which had increased by a further £150K this year. Work to address the remainder of the savings target continues.	0.1
Human Resources	Other Variances Less than 100K		0.1
<b>Human Resources</b>			<b>0.2</b>
Business Investment and Culture	Sports, Culture, Destination & Bus Relationships	Business rate and running cost pressures of c£1.4m as a result of maintaining the collection centre operational on an interim basis as part of the corporate project to develop the building into a cultural	1.6

		hub. Additionally, £280k energy inflation relating to The Wave leisure centre and £100k trading deficit expected for St. Mary's NOMH contract whilst it establishes itself as a venue.	
Business Investment and Culture	Economic Development service (EDS)	Unfunded committed support to businesses by payment to partners of £130k to the growth hub for business support and £89k to the Chamber of Commerce for start-up support	0.2
<b>Business Investment and Culture</b>			<b>1.8</b>
Transportation & Highways	Highways	An under recovery of income for highways operational staff (DLO) of £0.3m due to sickness and strike action, together with the delayed achievement of some MTFS savings targets of £0.3m	0.6
Transportation & Highways	Traffic	The pressure relates primarily to an anticipated significant increase in street lighting energy costs from October 2022, resulting in unfunded contract costs of £0.8m. In addition there is a pressure relating to the increased volume and cost of highway asset repairs of £0.2m, which is largely due to unrecoverable costs of traffic accidents	1.2
Transportation & Highways	TH Management & Support	Variance is largely due to unachieved historic MTFS targets	0.1
Transportation & Highways	Transport and Innovation	This reflects the recruitment of additional Highways Development Management agency staff resources, brought in to support major planning applications and to provide cover for vacancies due to the inability to recruit.	0.2
<b>Transportation &amp; Highways</b>			<b>2.1</b>
Streetscene & Regulatory Services	Planning Services	As a result of the downturn in the economy, income is expected to be reduced by c£482k. This reflects a national trend in reduced number of major planning applications	0.5
Streetscene & Regulatory Services	Streetpride & Parks	This primarily reflects several income targets not being achieved. The Coventry Funeral Director Service has not yet commenced (£160k), WMP and Coombe Park Car Parking income underachievement (£190k), and WMP activities (£92k). In addition, there are cost pressures relating to traveller incursion prevention of £127k and service Fleet Pressures of £173k.	0.8
Streetscene & Regulatory Services	Waste & Fleet Services	<p>This pressure is predominantly the combined impact of the HGV driver industrial action, and mitigations put in place to ensure continuity of service.</p> <p>Domestic Waste is forecasting a pressure of c£5.9m. Strike mitigations during the dispute, net of salary savings represent c£3.8m of this. Additionally, net costs related to maintaining the collection service post-strike and ER/VR are estimated at £803k, and fleet pressures of £804k related to hire of vehicles and fuel, c£697k related to Temporary staff, Agency &amp; sickness.</p> <p>Commercial Waste is forecasting a shortfall in surplus of £1.2m. This is as a direct result of contracts lost during the period of industrial action. Work has now</p>	7.0

		commenced to identify how best to manage this in the medium term.	
Streetscene & Regulatory Services	Environmental Services	Pest Control is forecasting a shortfall in income of c50k, There are also overspends on overtime and other pay in ESU and Street Enforcement of c£256k whilst vacancies are being recruited to	0.3
Streetscene & Regulatory Services	Other Variances Less than 100K		0.1
<b>Streetscene &amp; Regulatory Services</b>			<b>8.7</b>
Project Management and Property Services	Facilities & Property Services	This relates primarily to a projected £1.1m energy price increase pressure from October 22, together with a c£0.3m Fairfax Street (former Leisure Centre) running costs pressure. These are offset partially by £0.30m reflecting trading performance surplus in R&M and compliance services, and a reduction in corporate building cleaning costs	1.1
Project Management and Property Services	PMPS Management & Support	Corporate Property savings target overachievement	(0.2)
<b>Project Management and Property Services</b>			<b>0.9</b>
Public Health	Public Health - Migration	This underspend relates to the holding of migration grant income centrally which is funding costs of other services across the Council.	(0.4)
Public Health	Public Health - Health Protection	Utilisation of additional grant resources to manage cost pressures	(0.1)
<b>Public Health</b>			<b>0.5</b>
Ringfenced Funding	SEND & Specialist Services	Demand for both Education, Health and Care (EHC) Plans and special school placements proved significantly higher than anticipated, during the course of the Summer and Autumn terms 2022. Costs have been further impacted by an increase in the average unit cost of an EHC Plan, reflecting a rise in the complexity of presenting needs. As a consequence, additional placements in both local and external special schools have had to be commissioned.	0.4
Ringfenced Funding	Schools	£0.2m underspend relating to the cash adjustment for the 21/22 Early years allocation where the Council's allocation has increased. £2.6m underspend relates to the High Needs holding pot.	(2.8)
Ringfenced Funding	Education Entitlement	The underspend is a result of staffing vacancies, which are being recruited to. There is also a further head of service vacancy that is subject to review as part of the wider budget setting process.	(0.1)
Ringfenced Funding	Financial Strategy	Technical adjustment to remove total of ringfenced variances from corporate position	2.5

Ringfenced Funding	Other Variances Less than 100K		(0.4)
<b>Ringfenced Funding</b>			<b>0.0</b>
Corporate & Contingency	Corporate Finance	<p>This incorporates favourable variances of £4.4m in the Asset Management Revenue Account (AMRA) and £4.9m across all other contingency budgets.</p> <p>The AMRA variation incorporates higher than budgeted interest income from loans provided by the Council plus higher than budgeted investment income which is due to a combination of larger short-term investment balances and higher interest rates.</p> <p>The cost of the 2022/23 pay award averages c6% for the Council and represents a cost c£6m above the original budget, offset in part by other non-pay contingency budgets and a contribution from reserves established to manage inflation volatility. Favourable variations including a Business Rates Pool surplus (£2m) and lower than budgeted superannuation costs (£2.1m).</p>	(9.3)
<b>Corporate &amp; Contingency</b>			<b>(9.3)</b>
<b>Total Non-Controllable Variances</b>			<b>11.3</b>

## Appendix 2

### Capital Programme Approved / Technical Changes

SCHEME	EXPLANATION	£m
Active Travel Neighbourhoods	Award of £1m grant for the delivery of active travel neighbourhoods in Earlsdon and Lower Coundon. The grant award is from Active Travel Fund 3 (ATF3) and will be claimed from the West Midlands Combined Authority. A City Region Sustainable Transport Settlement report was taken to Council on 6th September 2022 to approve this funding.	1.0
Highways Maintenance & Investment	A 2022/23 Transportation and Highways Maintenance Capital Programme Supplementary report will be taken to Cabinet on the 30th November to formally approve the agreed additional £0.3m from the Management of Capital Reserve for pot hole patching works.	0.3
Woodlands - Main Build -Basic Need	Cabinet on 12th October 2021 approved the appointment of the design team to enable the delivery of the capital refurbishment works required on the Woodlands site	0.4
Public Realm - Coventry Cross	Since the initial programme of works and budget estimation for Coventry Cross we have seen materials and prices rise at the fastest and highest rates in the last 40 years, this has impacted the costs of items such as steel, an integral part of the Coventry Cross structure. Additionally archaeological finds onsite have caused some delay cost impacts. This additional funding allows us to absorb these costs and provide a small buffer of contingency.	0.1
Green Homes Grant LAD2	Underspend on the grant funded programme, due to higher dropout rate, technical feasibility and the impact of new regulation PAS2035, and other grant conditions has meant were unable to fully spend the grant within it timescales. There is a LAD3 programme which will capture some of the scheme's slippage	(0.9)
Miscellaneous under £100k		(0.5)
<b>TOTAL APPROVED / TECHNICAL CHANGES</b>		<b>0.3</b>

### Appendix 3

#### Capital Programme Rescheduling and Accelerated Spend

<b>SCHEME</b>	<b>EXPLANATION</b>	<b>£m</b>
City Centre South	There has been higher than anticipated costs for commercial and legal advice as a result of changes required to the Development Agreement and the change control request to WMCA	0.4
Housing Venture	Problems with obtaining Planning Permission have stopped the majority of the projects being carried out this year	(0.8)
Vehicles	Vehicles that were due to be bought last year have now been purchased in 2022/23 so increasing the spend	1.0
Higher Needs	The work on Woodlands School will not be taking place in 2022/23 so has been rescheduled to 2023/24	(1.0)
Coombe Loan	Rescheduling the balance of the loan facility approved in 2019/20	(0.4)
<b>TOTAL RESCHEDULING</b>		<b>(0.8)</b>

## Appendix 4

### Capital Programme Analysis of Overspend

<b>SCHEME</b>	<b>EXPLANATION</b>	<b>£M</b>
Public Realm Phase 5 - City of Culture	The PR5 programme was a transformative £44m WMCA funded project with the objective to ready the city for UK City of Culture 2021. This wide ranging programme was delivered during the Covid 19 pandemic and during a time where the construction industry suffered extensive resource shortages, material delays and price increases. As a result, the PR5 programme overspent by £621k. The majority of these costs can be attributed to increased scope of works, Covid 19 delay costs and associated resource prolongation costs as a result.	0.6
<b>TOTAL OVERSPEND</b>		<b>0.6</b>

## Appendix 5

### Prudential Indicators

Indicator	per Treasury Management Strategy 2022/23	As at 30 September 2022
<b>Ratio of Financing Costs to Net Revenue Stream (Indicator 1)</b> , 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.	15.09%	14.74%
<b>Gross Borrowing should not, except in the short term, exceed the total of the Capital Financing Requirement (CFR) at 31<sup>st</sup> March 2022 plus the estimates of any additional CFR in the next 3 years (Indicator 2)</b> , illustrating that, over the medium term, net borrowing (borrowing less investments) will only be for capital purposes. The CFR is defined as the Council's underlying need to borrow, after taking account of other resources available to fund the capital programme and is the amount of capital expenditure that has not yet been financed by capital receipts, capital grants or contributions from revenue.	Estimate / limit of £518.0m	£321.8m Gross borrowing within the limit.
<b>Authorised Limit for External Debt (Indicator 5)</b> , 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.	£538.0m	£321.8m is less than the authorised limit.
<b>Operational Boundary for External Debt (Indicator 6)</b> , 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.	£518.0m	£321.8m is less than the operational boundary.
<b>Upper Limit on Fixed Rate Interest Rate Exposures (Indicator 9)</b> , 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.	£474.4m	£236.2m
<b>Upper Limit on Variable Rate Interest Rate Exposures (Indicator 9)</b> , as above highlighting interest rate exposure risk.	£94.9m	-£78.2m
<b>Maturity Structure Limits (Indicator 10)</b> , 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.		

<p>The maturity of borrowing is determined by reference to the earliest date on which the lender can require payment.</p> <p>&lt; 12 months  12 months – 24 months  24 months – 5 years  5 years – 10 years  10 years +</p>	<p>0% to 50%  0% to 20%  0% to 30%  0% to 30%  40% to 100%</p>	<p>6%  1%  19%  5%  69%</p>
<p><b>Investments Longer than 364 Days (Indicator 11)</b>, 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.</p>	<p>£30m</p>	<p>£0.0m</p>

This page is intentionally left blank



---

Cabinet  
Council

13 December 2022  
17 January 2023

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

**Director Approving Submission of the report:**

Chief Operating Officer (Section 151 Officer)

**Ward(s) affected:**

City wide

**Title:**

Council Tax Premiums for Empty Properties and Second Homes

---

**Is this a key decision?**

Yes. The decision may result in revenue implications exceeding £1 million.

---

**Executive Summary:**

The Levelling Up and Regeneration Bill also proposes to allow billing authorities to charge a 100 per cent long term empty premium on unfurnished empty properties after the property has been empty for 12 months rather than the current period of 24 months.

The Levelling Up and Regeneration Bill proposes to give billing authorities the power to apply a 100 per cent council tax premium for furnished empty properties (second homes, including second homes which are occupied but the occupiers main home is somewhere else).

The policy objective of these measures is to improve the supply of housing or for owners of second homes to make a greater contribution to council tax receipts.

If the Bill is enacted, reducing from 24 months to 12 months the timescale for long term empty property premiums could generate up to £0.9 million per annum in additional council tax. This figure would likely reduce over time as the policy intention begins to influence the behaviour of owners of empty properties.

This change, from 24 months to 12 months, for the long term empty premiums may be applied from 1 April 2024 and it is recommended that Council approve this measure.

The implementation of a premium for second homes could generate £3.6 million. The implementation of this type of premium is more complex in terms of the potential implications for housing policy and the impact on different stakeholders. It is not recommended that the Council proceed with this measure from April 2024 and instead review this option in the coming 12 months.

**Recommendations:**

Cabinet is requested to recommend that Council:

- 1) Approve the implementation a provision contained within the Levelling Up and Regeneration Bill to:
  - Apply a 100 per cent premium for properties that have been empty and unfurnished for 12 months or longer – this charge would be implemented from 1 April 2024 and applied to any property that had been empty for 12 months at that point and going forward.
  - Agree to review the option of implementing a 100 per cent premium on second homes following the Enactment of the legislation and receive a further report detailing any recommendations proposed to come into effect from April 2025.

Council is requested to:

- 1) Approve the implementation of provisions contained within the Levelling Up and Regeneration Bill to:
  - Apply a 100 per cent premium for properties that have been empty and unfurnished for 12 months or longer – this charge would be implemented from 1 April 2024 and applied to any property that had been empty for 12 months at that point and going forward.
  - Agree to review the option of implementing a 100 per cent premium on second homes following the Enactment of the legislation and receive a further report detailing any recommendations proposed to come into effect from April 2025.

**List of Appendices included:**

None

**Background papers:**

None

**Other useful documents**

None

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

No

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

No.

**Will this report go to Council?**

Yes

**Report title:**

Council Tax Premiums for Empty Properties and Second Homes

**1. Context (or background)**

- 1.1 The Levelling Up and Regeneration Bill includes provision for the amendment and imposition of council tax premiums for empty properties and second homes. The Bill, which, at the time of writing, is at report stage in the House of Commons, was introduced by the Department for Levelling Up, Housing and Communities (DLUHC) on 8<sup>th</sup> June 2022.

Empty and unfurnished properties

- 1.2 In 2013 legislation was introduced which allowed billing authorities to charge a 50 per cent council tax premium for unfurnished homes that had remained unoccupied for two years or longer. The Council resolved to implement this premium in full. Subsequent legislation increased the charge from 50 per cent to 100 per cent and introduced further premiums based on the length of time a property remained unoccupied. The charges currently applied in Coventry are detailed in figure 1 below.

**Figure 1 – Coventry council tax premiums for empty and unfurnished homes**

	Council tax premium	Number of properties in Coventry
Empty more than 2 years	100%	307
Empty more than 5 years	200%	67
Empty more than 10 years	300%	41

- 1.3 The Levelling Up and Regeneration Bill proposes to reduce from two years to one year the period from which a 100 per cent premium can be applied. The 200 per cent and 300 per cent premiums would remain unchanged.
- 1.4 The policy intention of these premiums is to incentivise property owners to bring back into use empty homes and so improve the overall supply of housing.
- 1.5 The 100 per cent long term empty premium currently generates approximately £0.5 million per annum in council tax revenue in Coventry. Reducing the empty period to one year would bring an estimated additional 577 properties into the premium and generate approximately £0.9 million additional revenue. It is expected that this amount will decrease over time as the policy intention takes effect and owners bring properties back into use.
- 1.6 The Bill proposes that the change in premium may be applied from 1 April 2024.

Second Homes

- 1.7 Furnished empty properties are currently exempt from long term empty premiums. The Levelling Up and Regeneration Bill includes provision to charge a new council tax premium for furnished empty properties – or second homes – at the rate of 100 per cent from the day the property becomes empty.
- 1.8 Second homes for council tax purposes include furnished rental properties and properties occupied by a person who has a sole or main residence somewhere else. Coventry has approximately 2,200 second homes at any given point. The potential additional tax revenue is approximately £3.6 million.

- 1.9 The policy intention is to encourage owners of second homes to make their homes available for permanent occupation and therefore improve the supply of housing. The policy is seen as being particularly helpful in areas with high levels of second home ownership where this restricts the supply of housing and artificially inflates prices. Coventry does not have comparably high levels of second home ownership
- 1.10 The Bill proposes to allow billing authorities to apply a 100 per cent premium from 1 April 2024. A determination to apply the charge must be made 12 months in advance of the financial year in which the charge is due to apply and therefore the Council must reach such a determination prior to 1 April 2023 if the intention is to apply the premium from 1 April 2024. The Council must also publish notice of the determination in a local newspaper within 21 days of the determination.

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

- 2.1 The Council could opt against implementing some or all of the powers contained within the Bill which relate to Council Tax premiums. Retaining the existing regime of council tax empty property premiums would have no financial implications nor further support the Council's objectives in respect of housing supply.
- 2.2 There are options to implement the measures with variations specific to Coventry. For example, the intention to charge a premium on empty furnished properties (second homes) would result in landlords paying more council tax during periods when properties are not let – including potentially short periods between tenancies. The Council could specify a minimum period for which a furnished property must be empty before the increased charge comes into effect – a period of two weeks or one month for example. This would provide a timeframe during which landlords can reasonably transition between tenants without incurring increased charges whilst ensuring the charges are applied to longer term empty furnished properties.
- 2.3 The point at which a premium applies for second homes could be set at 12 months to bring it into line with the regime for unfurnished empty properties. Such an approach would incentivise the re-occupation of properties and charge an additional premium to second homes after 12 months but would also limit potential council tax revenue. The potential council tax revenue for this approach would be approximately £1.5 million compared with £3.6 million from the premium being charged immediately.
- 2.4 However, the implementation of a premium for second homes is complex and the timescales involved to reach a decision are challenging. It is therefore recommended a decision in this respect be delayed to allow the opportunity to understand the final detail of the legislation, fully appraise the complexities of the measure and monitor the practical implementation of the measure in those Authorities implementing the measure from 1 April 2024.
- 2.5 The Bill may be subject to alterations prior to receiving Royal Assent. It is recommended that Council make the decision to implement proposals contained within the current draft bill as follows:
- the Council applies a 100 per cent premium for properties that have been empty and unfurnished for 12 months or longer – this charge would be implemented from 1 April 2024 and applied to any property that had been empty for 12 months at that point and going forward.
- 2.6 It is not recommended that Council approve the implementation of a second home premium at this time in readiness for April 2024. Instead it is proposed that the option is kept under review and subject to further evaluation prior to a decision being made in time for April 2025.

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

3.1 None

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

4.1 Subject to the Levelling Up and Regeneration Bill being enacted:

- The application of a 100 per cent premium to unfurnished properties that have been empty for 12 months may be applied from 1 April 2024.

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

#### **5.1 Financial implications**

The imposition of the additional council tax premium will benefit the collection fund, and overall corporate resources, as follows:

Reducing from 24 months to 12 months the point at which a long term empty premium is applied for empty and unfurnished properties.

Approximately 580 additional properties would be captured by the premium resulting in increased council tax revenue of approximately £0.9 million per annum.

Imposing a 100 per cent second home premium on furnished empty properties from the day they become empty

Approximately 2,000 properties would attract the premium generating additional council tax revenue of approximately £3.6 million per annum.

The Council retains approximately 90 per cent of the additional council tax revenue generated with approximately 10 per cent being distributed to precepting authorities.

The figures quoted above are based on data at the time of writing. The underlying policy intention is to increase the supply of housing rather than increase council tax revenue. If the policy intention is realised then the figures quoted are likely to be reduced over time in response to the behaviour of owners of empty properties and second homes.

#### **5.2 Legal implications**

The recommendations set out within this report are subject to the Levelling Up and Regeneration Bill receiving Royal Assent and coming into force in the UK.

### **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 proposal supports the Council's objectives in respect of improving the quality of life for Coventry people and maximising Council revenue.

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

No risks have been identified.

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

The recommendations would increase council tax revenue and encourage owners to bring back into use empty properties.

**6.4 Equalities / EIA**

No impact.

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

No impact.

**6.6 Implications for partner organisations?**

No impact.

**Report author(s):**

**Name and job title:** Barrie Strain, Head of Revenues and Benefits

**Service:** Finance

**Tel and email contact:** 02476 977198 barrie.strain@coventry.gov.uk

Enquiries should be directed to the above person.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Directorate or organisation</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Lara Knight	Governance Services Coordinator	Law and Governance	15/11/22	18/11/22
Phil Baggott	Lead Accountant	Finance	15/11/22	18/11/22
<b>Names of approvers for submission:</b> (officers and members)				
Finance: Paul Jennings	Finance Manager	Finance	15/11/22	16/11/22
Legal: Sarah Harriott	Corporate Governance Lawyer	Law and Governance	15/11/22	16/11/22
Members: R Brown	Cabinet Member for Strategic Finance and Resources			

This report is published on the council's website:  
[www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)

This page is intentionally left blank



Cabinet

13<sup>th</sup> December 2022

**Name of Cabinet Member:**

Cabinet Member for Public Health and Sport – Councillor K Caan

**Director Approving Submission of the report:**

Director of Public Health and Wellbeing

**Ward(s) affected:**

All

**Title:**

Approval of Rough Sleeping Drug and Alcohol Treatment Grant

---

**Is this a key decision?**

No

---

**Executive Summary:**

The City Council was successfully awarded a grant of up to £640,361 to support rough sleepers and those at risk of rough sleeping to engage with and access drug and alcohol treatment in January 2022 which was to fund activity up to March 2023. Following confirmation of this funding, the Council were asked to revise their bid for 2022/23 and to bid for funding for 2023/24. As a result of this, the Council has now been awarded £1,228,092 from the Office for Health Improvement and Disparities - Department of Health and Social Care (“OHID”) for the period April 2022 to March 2024. It is expected that there may be one further round of bidding for the Rough Sleeping Drug and Alcohol Treatment Grant (RSDATG) to provide funds in 2024/25.

The Council’s constitution requires formal Cabinet approval prior to agreeing to receive external grants in excess of £500,000. Where time does not allow this to happen approval can be sought by the relevant Director in consultation with the relevant Cabinet Member and Scrutiny Chair with a requirement to then report retrospectively to Cabinet. As time was not available to report in advance of signature for this grant, approval was gained by the Director of Public Health and Wellbeing, in consultation with Councillor Caan (Cabinet Member for Public Health and Sport), Councillor Duggins (Cabinet Member for Policy and Leadership) on behalf of Councillor Welsh (Cabinet Member for Housing and Homelessness) and Councillor N Akhtar (Chair, Scrutiny Co-ordination Committee); with agreement for a retrospective report to Cabinet.

**Recommendations:**

Cabinet is recommended to:

- 1) Note the approval to retrospectively accept the Rough Sleeping Drug and Alcohol Treatment Grant in the sum of £1,228,092 from OHID for the period April 2022 to March 2024.
- 2) Authorise the Council to bid and accept further grant monies from OHID for Rough Sleeping Drug and Alcohol Treatment in the maximum sum of £2,499,000 for the period 2024- 2025.
- 3) Delegate authority to the Director of Public Health and Wellbeing, following consultation with the Chief Legal Officer and the Cabinet Member for Public Health and Sport to undertake the necessary due diligence, negotiate the terms and conditions of any funding agreement with OHID and enter into the necessary agreement to bring into legal effect the recommendation set out at (2) above.

**List of Appendices included:**

None

**Background papers:**

None

**Other useful documents:**

Approval of Rough Sleeping Drug and Alcohol Treatment Grant Cabinet Report – 11<sup>th</sup> January 2022

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

Yes – this matter will be considered by Scrutiny Co-ordination Committee as part of their Work Programme for 2022/23

**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:** Rough Sleeping Drug and Alcohol Treatment Grant

**1. Context (or background)**

- 1.1 Coventry was identified by the Department for Levelling Up, Housing and Communities – (DLUHC) and the Office for Health Improvement and Disparities (OHID) as a priority area for additional funding to support drug and alcohol treatment services for rough sleeping and homeless populations in June 2021.
- 1.2 As such, the City Council was invited to submit proposals for the Rough Sleeper Drug and Alcohol Treatment Grant (RSDATG) scheme to provide additional services for people currently, or at risk of, rough sleeping. The scheme allowed bids for activity up to March 2023 and uses funds secured by MHCLG and the Department of Health and Social Care. Cabinet received a report on this proposal in January 2022.
- 1.3 The purpose of the grant is threefold:
  - to support people experiencing, or at risk of, rough sleeping to access and engage in drug and alcohol treatment
  - to ensure that the engagement that people have had with drug and alcohol treatment services whilst rough sleeping or in emergency or temporary accommodation is maintained as they move into longer term accommodation
  - to build resilience and capacity in local drug and alcohol treatment systems to continue to meet the needs of this population in future years
- 1.4 In June 2021 there were approximately 10 people known to be misusing substances and rough sleeping and a further 550 people misusing drugs or alcohol and in a form of temporary accommodation. Of this total approximately 250 were not engaged in substance misuse specialist treatment.
- 1.5 Following the initial invitation to submit proposals for the RSDATG scheme, Public Health and Housing teams identified the need to create a number of dedicated outreach roles to support this population to engage in treatment, including:
  - a specialist drug and alcohol outreach worker within the Council Rough Sleeper Outreach team to engage with people currently 'bedding down' into treatment services
  - a team of outreach workers within Change, Grow, Live (CGL Coventry - the Council's commissioned drug and alcohol treatment service) to engage with people in temporary accommodation and at risk of rough sleeping
  - a team of allied specialist roles including a physical healthcare nurse, a Non-Medical Prescriber and an occupational therapist to support people to engage in treatment. These roles will predominantly deliver services at times and places which meet the specific needs of people rough sleeping in order to maximise engagement
- 1.6 The original bid was submitted in June 2021 and totalled spend of up to £640,361 over a 21-month period to March 2023. However, confirmation of the successful bid was not received until December 2021 which created a delay in starting the project. This delay, coupled with recruitment challenges, which were seen nationwide, resulted in an underspend for 2021/22.
- 1.7 In May 2022, OHID requested revised bids be submitted for the period July 2022 to March 2023 and to extend the scheme to March 2024 to bring the different phases of the grant in line.

- 1.8 On 13 October 2022, OHID announced Coventry's second bid had been approved. A formal grant award was subsequently received on 13 October 2022. This grant award is for the period April 2022 to March 2024 and is for £1,228,092.
- 1.9 The RSDATG funding can only be used to fund activity which fall within the remit of the grant.

### **Rough Sleeper Drug and Alcohol Treatment Grant to date**

- 1.10 Recruitment for the RSDATG posts funded in the initial bid began in Autumn 2021. However, there have been challenges in filling the full complement of posts due to a shortage of suitable candidates, reflecting nationwide workforce challenges in this area. The majority of the posts funded in the first round are now in place and outreach work is underway, including regular walks with the CCC homelessness team and regular drop-in sessions at partner locations across the City have been established.
- 1.11 The service users supported by the RSDATG have complex and multiple needs. The outreach workers are building relations with individuals which will improve treatment rates over the lifetime of the grant. The inclusion of the non-medical prescriber and nurse to support the outreach workers has improved access to substitute prescribing services. There is enhanced working between CCC Housing and CGL who are supporting individuals to stabilise their accommodation and move them forward on their housing journey.
- 1.12 The new funding also provides for an Approved Mental Health Professional (AMHP) who will be based in the Social Interventions Collection (SICoI), which is premised on delivering a human response to a human situation through strengths based social work assessment and intervention to individuals experiencing acute and/or enduring mental disorder. This is an innovate approach and will be evaluated for effectiveness over the lifetime of the grant.
- 1.13 The funding also includes increasing capacity in the core CGL service which RSDATG clients will move into when appropriate, funding for Opiate Substitution Therapy including prescribing, dispensing and supervised consumption and two apprenticeship posts to build workforce capacity which would be open to those with lived experience.
- 1.14 The acceptance of the grant requires quarterly performance returns be completed. From this data we know that the RSDATG team engaged with 18 Rough Sleepers and 45 individuals at risk of rough sleeping, including those in temporary accommodation between 1<sup>st</sup> July and 30<sup>th</sup> September 2022. 56 of these individuals engaged in some form of structured treatment during this period.
- 1.15 Locally we are planning a comprehensive evaluation of this programme, looking at the outputs, outcomes and impact of the service. A logic model has been developed to support the evaluation and a dashboard to monitor delivery progress has also been developed. The evaluation and logic model will help us to understand which elements of the project have work and embed these into future service provision when the funding comes to an end.

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

- 2.1 The value of the Rough Sleeper Drug and Alcohol Treatment Grant is such that the Constitution requires formal approval prior to acceptance.
- 2.2 As time did not allow Cabinet approval in advance of signing the grant agreement, the Director of Public Health and Wellbeing, in consultation with Councillor Caan (Cabinet Member for Public Health and Sport), Councillor Duggins (Cabinet Member for Policy and

Leadership) on behalf of Councillor Welsh (Cabinet Member for Housing and Homelessness) and Councillor N Akhtar (Chair, Scrutiny Co-ordination Committee), gave approval as permitted within the constitution to sign the agreement, to be reported to Cabinet retrospectively.

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

- 3.1 Timescales for completion of the second round of bidding for the Rough Sleeper Drug and Alcohol Treatment Grant meant there was limited opportunity to consult widely. However, for the first bidding round, outreach workers from the Council's Housing and Homelessness team conducted brief consultation with rough sleepers who supported the approach taken for the bid, including a focus on individual's physical healthcare needs. The bid has been developed in partnership with the Homelessness team and CGL.
- 3.2 Prior to submission, the initial bid received sign off from the Council's Chief Executive, Director of Adult Services and homelessness commissioner, from the CCG Director of Commissioning and from CGL at Director-level. The second bid received sign off from the Director of Public Health and Wellbeing and CGL at Director level as the additions to the bid were enhancements of the initial phase.

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

- 4.1 The second Rough Sleeper Drug and Alcohol Treatment Grant Agreement was signed on 28 October 2022 and returned to OHID. Recruitment of new posts has commenced to support rapid mobilisation.

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

#### **5.1 Financial implications**

- 5.1.1 Following the change in timescales the revised grant for the period April 2022 to March 2024 is £1,228,092. For 2022/23 the grant is £524,208, with the balance of £703,884 being for the period to end of March 2024. The allocations and process for 2024/25 funding will be confirmed nationally at a later stage.
- 5.1.2 Spend against the grant will be monitored in line with corporate processes and reported as per the requirements of the quarterly reporting detailed in the grant agreement.

#### **5.2 Legal implications**

- 5.2.1 s1 Localism Act 2011 gives the Council a general power of competence and as such the Council has the power to receive grant funding and enter into a grant agreement.
- 5.2.2 The Council will need to ensure that the terms and conditions of the grant from OHID are adhered to. The Council's Public Health Service will be responsible for ensuring that the grant is managed correctly, and Legal Services will provide the necessary support to address any legal issues associated with the acceptance of the grant award.
- 5.2.3 Whilst the Council are responsible to deliver the requirements of the grant, the Council may enter into contract with a supplier to deliver upon some or all of the grant requirements. Such supplier will be procured in accordance with the Public Contract Regulations 2015 and performance of the contract will be monitored by the Council's Public Health Service.

## 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 services support the One Coventry Corporate Plan's vision to help to make communities safer, improve the health and wellbeing of local residents and protect our most vulnerable people.

### 6.2 How is risk being managed?

Public Health and Housing commissioners will work closely to understand and mitigate risks in relation to the Rough Sleeper Drug and Alcohol Treatment Grant. Key risks include:

- **Failure to appoint recruit posts.** Recruitment of posts started prior to the receipt of the formal grant award in order to offer applicants the longest possible term of employment. Broadly recruitment has progressed well but the response to some advertised posts has been limited and alternative solutions will be considered. Some posts are being recruited on a permanent basis rather than fixed term appointment, at the financial risk of the provider, in order to improve the quality of applicants.
- **Limited capacity within current treatment service to meet the new demand.** The increase in number of clients accessing structured treatment with CGL Coventry through the additional engagement activity by the outreach team will place additional pressure on an already stretched service. The bid included an additional worker to provide capacity during the period of the scheme and some further funding is available from OHID to meet additional clinical costs such as prescribing for opiate substitute therapy; it is unclear at this stage if these costs will be met for any period beyond the end of the grant scheme. Public Health commissioners meet with CGL Coventry management regularly to understand service pressures.
- **Short term funding.** Funding is available for activity to March 2024 and it is unclear what, if any, further funding may be made available. Demand for outreach should reduce over time if, as intended, the provision supports a significant number of people into sustained episodes of treatment. Commissioners will work closely to ensure links between CGL Coventry and homelessness services are closely aligned.

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

The grant provides additional capacity with the Rough Sleeper Outreach team. Activity delivered under the grant may identify additional needs requiring further social care support.

### 6.4 Equality Impact Assessment (EIA)

The provision is targeted at supporting some of the most vulnerable people in our communities. To deliver an enhanced positive impact to groups with protected characteristics and more excluded, dedicated roles will be created to support females at risk of rough sleeping including female sex workers, and foreign nationals.

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

There are no implications.

## 6.6 Implications for partner organisations?

CGL Coventry is commissioned to deliver drug and alcohol services by the City Council and operates closely with a wide range of partners including primary and secondary healthcare providers, homelessness services and social care services.

CGL also delivers drug and alcohol services in Warwickshire, commissioned by the County Council.

### Report author(s):

Victoria Castree, RSDATG Project Manager – Public Health

### Service:

Public Health and Wellbeing

### Tel and email contact:

Tel: 024 7683 1699

Email: [victoria.castree@coventry.gov.uk](mailto:victoria.castree@coventry.gov.uk)

Enquiries should be directed to the above person.

Contributor/approver name	Title	Service	Date doc sent out	Date response received or approved
<b>Contributors:</b>				
Rachel Chapman	Public Health Consultant	Public Health and Wellbeing	08/11/22	14/11/22
Paul Hargrave	Senior Commissioning Manager – Adult Public Health Services	Public Health and Wellbeing	08/11/22	09/11/22
Ewan Dewar	Finance Manager	Finance	08/11/22	11/11/22
Lara Knight	Governance Services Co-ordinator	Law and Governance	11/11/22	18/11/22
John Redfern	Corporate and Commercial Lawyer	Legal Services	08/11/22	14/11/22
<b>Names of approvers for submission:</b> (officers and members)				
Allison Duggal	Director of Public Health and Wellbeing	-	10/11/22	14/11/22
Gurbinder Sangha	Head of Legal & Procurement Services	Law and Governance	14/11/22	14/11/22
Barry Hastie	Chief Operating Officer	-	10/11/22	11/11/22
Councillor K Caan	Cabinet Member for Public Health and Sport	-	10/11/22	14/11/22
Councillor D Welsh	Cabinet Member for Housing and Homelessness	-	10/11/22	14/11/22
Councillor N Akhtar	Chair of Scrutiny Co-ordination Committee	-	10/11/22	10/11/22

This report is published on the council's website: [www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)

This page is intentionally left blank



## Public report Cabinet Report

Cabinet  
Council

13 December 2022  
17 January 2023

### **Name of Cabinet Member:**

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

### **Director Approving Submission of the report:**

Director of Transportation and Highways

### **Ward(s) affected:**

All

### **Title:**

Public Realm 'Phase 6'

---

### **Is this a key decision?**

Yes expenditure is in excess of £1m

---

### **Executive Summary:**

In March 2018, Cabinet and Council gave approval to proceed with an ambitious Coventry City Centre Public Realm Phase 5 programme. Following a successful bid and a funding award of £44m from the Coventry and Warwickshire LEP and the West Midlands Combined Authority (WMCA), the council has transformed the city centre by improving and enhancing the main shopping precincts, the Bull Yard, Pepper Lane and Hertford St as well as improving signs and lighting around the city centre.

The public realm 5 project was undertaken from October 2019 and completed in time for UK City of Culture 2021, additionally it was delivered in unprecedented times throughout the Covid 19 pandemic in which the importance of our public spaces was thrust to the forefront of everyone's minds. In order to continue to build on the legacy which the public realm 5 project has left the project team have identified areas for further enhancement which were not part of the original project scope but will further improve the city centre areas.

A review of the works delivered have identified a public realm 6 programme of works that will focus on improving security and lighting and refreshing some of the areas surrounding Broadgate, The Precinct, Priory Place and the Cathedral. The schemes will deliver high quality improvements to strategic areas of the city and also enhance the setting of the key events venues and visitor attractions.

The key projects to be completed are:

- Retail Quarter Phase 2 – this will focus on upgrading some of the structures and facades around Broadgate, The Precinct, Market Way and Barracks Way tunnel

- Public Realm Refresh – there are some areas like Priory Place which have damaged water features and areas around the cathedral which need lighting upgrades.
- City Centre security which forms the largest part of the budget. This includes applying security measures to the area around the Cathedral, the University to create a safe events space and The Wave.

The Public Realm Phase 6 programme will be delivered in a co-ordinated way with businesses, Coventry BID and council partners to ensure any disruption is kept to a minimum.

### **Recommendations**

Cabinet is requested to:

1. Agree the revised scheme list and delegate authority to the Director of Transportation and Highways following consultation with Cabinet Member for Jobs, Regeneration and Climate Change, to agree the detailed works for schemes in Coventry City Centre Public Realm Phase 6
2. Delegate authority to the Director of Transportation and Highways, following consultation with Cabinet Member for Jobs, Regeneration and Climate Change and the Chief Operating Officer to agree the detailed works and budgets for additional Public Realm Phase 6 funding.
3. Delegate authority to the Director of Transportation and Highways following consultation with Cabinet Member for Jobs, Regeneration and Climate Change, alongside Procurement Board to agree the most appropriate procurement route for the works to be delivered

Cabinet is requested to recommend that Council:

1. Approve the addition of £1.8m of corporate resources to the 5 year capital programme to deliver the Public Realm 6 programme, funded from capital receipts

Council is requested to:

1. Approve the addition of £1.8m of corporate resources to the 5 year capital programme to deliver the Public Realm 6 programme, funded from capital receipts

### **List of Appendices included:**

Appendix A – Public Realm Phase 6 scheme descriptions

### **Background Papers:**

None

### **Other Useful Documents:**

1. Coventry City Centre Public Realm Phase 1 – Council report of 28<sup>th</sup> January 2011
2. Coventry City Centre Public Realm Phase 2 – Council Report of 23<sup>rd</sup> October 2012
3. Coventry City Centre Public Realm Phase 2 Update – Council Report of 23<sup>rd</sup> July 2013
4. The Coventry Warwickshire First Wave Growth Deal – Council report of 9<sup>th</sup> September 2014
5. Coventry City Centre Public Realm Phase 3 – Council Report of 7<sup>th</sup> October 2014

6. European Regional Development Fund (ERDF) Open Call for Extension to Projects – Council report of 17<sup>th</sup> March 2015
7. Public Realm 3a – Council Report of 17<sup>th</sup> March 2015
8. Local Growth Deal - Public Realm Phase 4 & Infrastructure Projects – Council Report of 11<sup>th</sup> October 2016
9. Coventry Station Masterplan Update – Council Report of 24<sup>th</sup> January 2017
10. Connecting Coventry Strategic Transport Investment Programme – Council Report of 24<sup>th</sup> January 2017
11. Connecting Coventry – Strategic Transport Investment Programme Update – Council Report of 13<sup>th</sup> March 2018
12. 2018/19 Transportation and Highway Maintenance Capital Report – Cabinet Report 6<sup>th</sup> March 2018
13. Public Realm Phase 5 – Council Report of 13<sup>th</sup> March 2018

All of the above documents are available via the Council's website:

<https://edemocracy.coventry.gov.uk/uuCoverPage.aspx?bcr=1>

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

No

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

No

**Will this report go to Council?**

Yes – 17<sup>th</sup> January 2023

## Report title: Public Realm 6

### 1. Context (or background)

- 1.1. The Public Realm programme has been extremely successful to date, with the team so far secured over £80m of additional public sector funding which have been used to deliver public realm improvements in the city centre, enhancing the walking routes and making the city greener and more pleasant.
- 1.2. A series of additional public realm improvements are proposed in this report to be delivered as part of a new Public Realm Phase 6 programme, at a cost of £1.8m. The proposed schemes will deliver enhancements to key strategic parts of the city and also enhance the setting of the key events venues and visitor attractions, both in terms of appearance and security.
- 1.3. The proposed programme, with further detail regarding costs and deliverables, can be found in Appendix A.
- 1.4. The key projects to be completed are:
  - Retail Quarter Phase 2 – this will focus on upgrading some of the structures and facades around Broadgate, The Precinct, Market Way and Barracks Way tunnel
  - Public Realm Refresh – there are some areas like Priory Place which have damaged water features and areas around the cathedral which need lighting upgrades.
  - City Centre security which forms the largest part of the budget. This includes applying security measures to the area around the Cathedral, the University to create a safe events space and The Wave.
- 1.5. It is proposed that £1.8m of corporate capital resources to be funded from capital receipts are made available to fund these projects.
- 1.6. It is important that the programme of Public Realm Phase 6 works is delivered in a carefully planned way to minimise impact on the city. All businesses will remain open during construction, and provision will be made to cater for events.
- 1.7. There is a robust governance in place to manage the Public Realm programme. The delivery team are very experienced, having delivered over £80m city centre public realm improvements to date.

### 2. Options considered and recommended proposal

- 2.1. **Option 1 – (Preferred) The City Council approves delivering the Public Realm Phase 6**
  - 2.1.1. The Council has a proven track record of delivering transformational public realm improvements in the city centre and has acted as lead applicant or accountable body for many capital funded projects. In essence it means the council being previously responsible for monitoring spend, submitting grant claims for eligible expenditure and demonstrating that the grant has been spent in achieving the outputs of the project, alongside the successful and timely delivery of the project.
  - 2.1.2. Using the resource available, the capital funds identified, and giving the council the ability to finish off the full programme of public realm and infrastructure improvements, ensuring the council are maximising impact and building on PR5 legacy. This will continue the work

of transforming the city centre, supporting businesses in the city, creating a city in which residents are proud of and encouraging investment into the city centre. By improving further the recent changes to the retail area in the city and upgrading the areas of the city which have not benefited from recent investment we can continue to ensure the growth of the city centre. Additionally, by enhancing our security further we will continue to ensure our city centre remains safe and protected, it will also allow for events to be held in spaces where previously funds had been needed to protect those spaces.

- 2.1.3. It is recommended this option is approved in order to maximise current funds available to deliver the full programme of public realm and security improvements and finish the overall city centre changes before 31st March 2024.

## **2.2. Option 2 – Not recommended**

- 2.2.1. This option would leave areas of the city unfinished and not allow the council to complete the high-quality, high security additions that the city centre needs to complement the PR5 legacy.

## **2.3. Recommended Proposal**

- 2.3.1. It is recommended that cabinet moves forward with the recommended Option 1 and agrees the programme of works which will be delivered at the same time to minimise disruption across the city and allow works to begin at pace.
- 2.3.2. Council are recommended to agree the £1.8m of corporate capital resources to be funded from capital receipts are made available to fund these projects.

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

- 3.1. Consultation was undertaken for the Public Realm 5 works; this project is building on the results of those conversations and by listening to business and residents' feedback throughout the PR 5 project. These conversations will continue for Public Realm Phase 6.
- 3.2. Consultation with Access Groups and City Centre stakeholders has been ongoing throughout the delivery of Public Realm schemes and will continue for the development of Phase 6.

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

- 4.1. The project is expected to be completed by 31 March 2024.

## **5. Comments of the Chief Operating Officer (Section 151 Officer) and Chief Legal Officer**

### **5.1. Financial implications**

- 5.1.1. The recommendations in the report seek approval to invest £1.8m of corporate resources to deliver a public realm 'phase 6' programme, to complete a number of improvements within the city, is outlined below in table 5.1:

Table 5.1: Public Realm 6 Programme

PUBLIC REALM 6 PROGRAMME	£'m
Retail Quarter Phase 2	0.8m
Security	0.8m
Public Realm Refresh	0.2m
<b>TOTAL FUNDING</b>	<b>1.8m</b>

- 5.1.2. One of the biggest current financial challenges to capital projects is the risk of rapidly rising inflation. Whilst this is a serious concern for all construction projects with estimates of increases in costs of up to 25%, the project team's commercial team has used benchmark rates of inflation to ensure sufficient contingency budgets are built into the scheme estimated costs.
- 5.1.3. In the event that unavoidable pressures do materialise, it should be noted that the works to be delivered are scalable, with the governance of the project being overseen by the Transport Capital Programme Board to ensure works are delivered within the £1.8m funding envelope.
- 5.1.4. The project costs are of a one off nature, and are not expected to create any ongoing cost liabilities

**5.2 Legal implications**

- 5.2.1 The public realm and infrastructure schemes will be delivered under the Council's general highway improvement/traffic management powers under the Highways Act 1980 except in relation to any new or amended formal pedestrian crossings/traffic regulation orders/traffic-calming measures which will be implemented following a separate statutory notice/objection process under the Road Traffic Regulation Act 1984.
- 5.2.2 Any works undertaken on properties belonging to others will be with their full collaboration and associated legal permission will be sought

**5.3 Procurement**

- 5.3.1 A mix of construction contracts would be used to maximise resource and capacity to ensure delivery in time for April 2024. The DLO would potentially carry out some of the schemes, with existing construction frameworks and/or competitive tender processes to be utilised for others (where applicable). The procurement strategy will be agreed by the Director of Transport and Highways, following consultation with the Cabinet Members and is subject to approval at Procurement Board.

**6. Other implications**

- 6.1. **How will this contribute to the Council's Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))?**
  - 6.1.1. The Public Realm Phase 6 programme will continue to provide jobs across the city and sub-region. The PR 6 works support the Economic Development Strategy 2022-2027 which aims to create a strong & resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are

created. It also supports the aspirations of the plan to realise the City Centre schemes in full.

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

6.1.3. The projects will also support the aspirations of the draft One Coventry Plan. The projects are aligned to a number of statements in the draft Plan including continuing to improve the city and marketing Coventry as an attractive place (priority – increasing the economic prosperity of the city and region). Crime prevention is also referenced in the draft Plan (priority – improving outcomes and tackling inequalities within our communities).

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

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

6.2.2. The programme manager for the works is responsible for managing compliance with the finance requirements such as reporting and budgetary management. The highly experienced Transport & Highways division who have already successfully delivered previous phases of public realm improvements will continue to implement the public realm schemes by working closely with their finance partners.

6.2.3. As stated above, inflation risk has been accommodated within the budget, and will be continually monitored throughout the delivery of the project to ensure delivery within budget.

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

### **HR Implications**

6.3.1. Staff are already in place from the previous public realm projects and can continue to carry out this function and take on the new projects. Agency staff may also be required to support the programme delivery team as required.

## 6.4. **Equalities / EIA**

6.4.1. Discussions with the Access Groups and representative organisations are underway and will continue through project development, to ensure that the design of all schemes to be developed properly reflects access needs. There have been regular meetings with the Access Development Groups. In particular, the Council has worked closely with the Guide Dogs Association providing funding to help the re-training of guide dogs in the new city centre. The lines of communication will be used to ensure that the needs of all users are considered when developing the projects

## 6.5. **Implications for (or impact on) the environment**

6.5.1. The projects will continue to put sustainable outcomes and greening of the city at the heart of the proposals. However, these projects are mainly small changes rather than whole scale transformations so opportunity to make large environmental impacts are limited.

## 6.6. **Implications for partner organisations?**

- 6.6.1. The City Council will need to work closely with other stakeholders and businesses in the delivery of the works programme.
- 6.6.2. The public realm activities at The Precinct will need to be coordinated with works to be undertaken to the retail infrastructure by Ellandi (formally Shearer Property Group contract).
- 6.6.3. The Council will be required to work with Coventry University, West Midlands Police, West Midlands Fire Service and Coventry Cathedral when installing security measures.

**Report author:**

**Name and job title:**

Jo Shore, Strategic Lead – City Centre Placemaking

**Tel and email contact:**

07834 636094

Jo.shore@coventry.gov.uk

(All queries should be directed to the above person)

<b>Contributor/ Approver name</b>	<b>Title</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors</b>			
Sunny Singh Heer	Lead Accountant	11/11/2022	14/11/2022
Lara Knight	Governance Services Co-ordinator	18/11/2022	18/11/2022
<b>Approvers</b>			
Legal: Oluremi Aremu	Head of Legal and Procurement Services	14/11/2022	16/11/2022
Finance: Phil Helm	Finance Manager	14/11/2022	16/11/2022
Director: Colin Knight	Director of Transportation and Highways	16/11/2022	18/11/2022
Councillor Jim O'Boyle	Cabinet Member (Jobs, Regeneration and Climate Change)	18/11/2022	21/11/2022

This report is published on the council's website:

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

## APPENDIX A – Public Realm Phase 6 Overview

### PR 6 Programme

<b>Project</b>	<b>Budget</b>	<b>Timescale</b>	<b>Contractor</b>
Retail Quarter Phase 2 - Facades - Barracks Way Tunnel - Stone column repairs - Canopy repairs	£772,743.70	2023-2024	Property contractors and skilled stonemasons
Public Realm Refresh - Lighting St Michaels Ave - Priory Gardens - Priory Place fountain - Structure repairs	£196,812.00	2023-2024	DLO, lighting and fountain contractors
City Centre Security - Security bollards	£818,433.00	2023-2024	Specialist security contractors
<b>Total</b>	<b>£1,787,988.70</b>		



**Cabinet**

13 December 2022

**Name of Cabinet Member:**

Cabinet Member for Adult Services

**Director approving submission of the report:**

Director of Adult Services and Housing

**Ward(s) affected:**

All wards are affected

**Title: Adult Social Care Preventative Support Grants**

---

**Is this a key decision?**

Yes - the proposals involve financial implications in excess of £1m per annum.

---

**Executive summary:**

Preventative support and early intervention are effective ways of preventing escalation of need that can lead to poorer outcomes, loss of independence and reliance on social care and health services.

The City Council has a long history of working with the voluntary and third sector to support adults who require support from Adult Social Care. The most recent iteration of this was the introduction of a Preventative Support programme, jointly funded with the Integrated Care Board (ICB), which commenced in 2018 and awarded a series of five-year grants following a grant bidding process. Through the grant programme, support has been successfully delivered to thousands of Coventry residents with a wide variety of needs across learning disabilities; mental health; sensory impairments; carers' support; people with dementia and their families; older people; and people who hoard.

Over the five-year grant period the Covid-19 pandemic has been a significant disruptor of how support is delivered where what organisations had planned to do was quickly replaced by what they had to do to support vulnerable people within the city. In addition, organisations in receipt of a grant are now adapting to provide the support people require in respect of cost-of-living crisis where many people are turning to voluntary sector organisations for support. In addition to these factors the local authority faces uncertainty in respect of its future resources which creates challenges in making long term funding decisions.

As a result of this combination of factors it is recommended that grants are awarded for up to two years for similar purposes following a short bidding process.

**Recommendation:**

Cabinet is recommended to:

1. Approve the award of grants totalling £5,406,000 to be awarded to voluntary sector organisations for a period of up to two years to 31 March 2025.
2. Delegate authority to the Director of Adult Services and Housing, in consultation with Cabinet Member for Adult Services, to undertake the necessary grant funding processes for voluntary sector organisations to apply for grant funding and undertake the necessary due diligence, negotiate the terms and conditions of any grant funding agreement with the voluntary sector organisations and enter into the necessary agreement to bring into legal effect the recommendation set out at (1) above.

**List of Appendices included:**

The following appendices are attached to the report:

Appendix One: Equality Impact Assessment

**Background papers:**

None

**Other useful documents:**

None

**Has it or will it be considered by scrutiny?**

No

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

This will also be considered by Coventry and Warwickshire Integrated Care Board, which part-funds the programme.

**Will this report go to Council?**

No

## Report title: Adult Social Care Preventative Support Grants

### 1. Context (or background)

- 1.1. Preventative support and early intervention are effective ways of preventing escalation of need that can lead to poorer outcomes, loss of independence and reliance on more formal support from social care and health.
- 1.2. Providing preventative support is a key component of effective delivery of Adult Social Care as well as being enshrined in the Care Act 2014, which requires local authorities to take steps to contribute towards preventing or delaying the development by adults and carers of care and support needs and reduce the need for care and support of adults and carers. The NHS Long-Term Plan and Five Year Forward View emphasise the need for close working with the voluntary and third sector to deliver improved care and support and address the wider determinants of health and wellbeing.
- 1.3. The City Council has a long history of working with the voluntary and third sector to assist adults who require support from Adult Social Care. The most recent iteration of this was the introduction of a Preventative Support programme which, jointly funded with the Integrated Care Board (ICB), commenced in 2018 and awarded a series of five-year grants following a grant bidding process. Through the grant programme support has been successfully delivered to thousands of Coventry residents with a wide variety of needs across learning disabilities; mental health; sensory impairments; carers; people with dementia and their families; people who hoard; and older people. These arrangements are funded by both the City Council and the Coventry and Warwickshire Integrated Care Board via the Better Care Fund with current grants due to end on 31 March 2023.
- 1.4. Through the grant programme support has successfully been delivered to thousands of Coventry residents with grants providing the flexibility for organisations to adapt and change how they support people to achieve outcomes. Some of the different types of provision that is delivered through the grant programme includes one-to-one support to adults with learning disabilities, mental health, and sensory impairments; carers' assessment and support planning; support for people with dementia and their families; support for people who hoard; online and face-to-face courses to improve and understand mental health; and specialist advice and guidance.
- 1.5. Adult Social Care is an area of growing demand, and the grant programme provides an effective way of helping the City Council manage the demand for social care and support. Many people access voluntary sector organisations for support directly and through the grant programme these organisations are resourced to provide this support as opposed to directing people to the City Council. In addition, the City Council, through its Adult Social Care direct service, receives a number of contacts from people who do not meet the eligibility threshold for care and support. Through the grant programme we are able to refer people to voluntary sector organisations for support where required.
- 1.6. One of the benefits of grants is the flexibility for organisations to adapt their services and support provided based on the delivery of outcomes, however, a potential negative is that grants do not provide the City Council with the same ability to hold organisations to account for delivery of specific targets that would be the case through contracts. To ensure that the City Council achieves value for grant funding organisations are required to provide information on activity and evidence of how they are contributing to meeting peoples care and support needs and working to prevent the escalation of need.

- 1.7. Over the grant period organisations have demonstrated the ability to adapt to changing circumstances. The impact of the Covid-19 pandemic was the most profound where organisations quickly replaced what they planned to do with what they had to do to support vulnerable people within the city. Cost of living increases are also resulting in people looking to voluntary sector organisations for support including those funded through this grant programme.
- 1.8. It is recognised that the security of longer-term funding is important to voluntary and third sector organisations to enable them to plan services and attract other funding sources. However, due to an uncertain public sector and local government funding position and the need to understand the impact of the cost-of-living crisis plus the longer-term impact and opportunities for service change following the pandemic a two year grant period is considered appropriate.
- 1.9. In respect of the organisations currently funded through Preventative Grants a brief description of the support provided is summarised for each below:
- 1.10. **Age UK**  
Age UK deliver advice and guidance and targeted interventions, with a focus on older people but open to all. They provide face-to-face support by appointment and telephone support and respond to approximately 6,000 calls for support each year. They also have a substantial outreach offer which prioritises those who do not have family or friends who are able to support them, for example with food shopping.
- 1.11. **Alzheimer's Society**  
Alzheimer's Society provide two different grant funded services as follows:
- 1.12. Dementia Connect - Alzheimer's Society are an important part of the dementia support system and offer people with dementia and their carers support navigating through initial diagnosis through to end of life. They deliver a range of the support that is central to delivering the Coventry and Warwickshire Dementia Strategy.
- 1.13. Alzheimer's Society deliver support to people with dementia and their carers. This was initially through their Dementia Navigator service, which changed to Dementia Connect during the grant period. A number of referral sources contribute to the demands on the Alzheimer's Society including direct referrals from Coventry and Warwickshire Partnership Trust (CWPT) Memory Service at the point of diagnosis. The service supports around 400 people per year and co-delivers post-diagnosis groups with the Memory Service.
- 1.14. Carers' Information and Education – The CRISP (Carers' Information and Support Programme) project delivers several courses throughout the year to equip carers with the information and support they need when caring for someone with dementia, after which they can access a monthly support group. During the pandemic this moved to a virtual offer, which has remained popular despite the resumption of a face-to-face service, so both options are now available.
- 1.15. **Anjuman**  
Anjuman provides 17 bedded supported accommodation to people with severe and enduring mental health issues, supporting them for up to two years and helping them transition to living independently in the community. Approximately half of residents move on within a year, and vacancies that arise are quickly filled. During the grant period so far, they have supported 151 people with housing related support, adding value by opening three additional supported living

and move on facilities. This is way in excess of the original expectation that the service supported at least 43 people during the grant period.

1.16. As well as severe and enduring mental health needs, more than half of people supported by the service have been helped with drug and alcohol addictions, and others with family conflict and homelessness. The service plays a particularly important role in delivering culturally and religiously sensitive services to people from diverse communities with 43% of service users being from non-White backgrounds.

1.17. **Birmingham Institute for the Deaf**

Birmingham Institute for the Deaf deliver one-to-one support and advice to people with vision and/or hearing loss to help them remain independent. Regular one-to-one support is currently delivered to 28 people, supporting them with issues such as housing and accessing services. The service both supports and employs people with sensory impairments.

1.18. **Heart of England Carers Trust**

Heart of England Carers' Trust provide two different grant funded services as follows:

1.19. Carers' Wellbeing Service - Heart of England Carers Trust deliver the Carers' Wellbeing Service. The service is well received and valued by carers and professionals and offers support for family carers with information, advice and guidance, group activities, training for carers, emergency response support and short breaks provision. The service also undertakes the completion of Carers Assessments on behalf of the City Council. The service plays an identifiable role in prevention and reducing the need for carers to contact adult social care.

1.20. In September 2020, additional time limited funding was granted to the Carers Trust to help respond to the significant pressures in relation to carers, this included the running of a Virtual Day Opportunities, the provision of Direct Payment support, the delivery of Grief and Loss support and targeted support for social isolation. Due to the success of this project the core aspects continued into 2022/23, including Carers Direct Payments, Carers Employment Worker and the Grief and Loss emotional support.

1.21. Primary Care Support – This service seeks to embed carer-friendly practices into GP surgeries, supporting the identification of carers, promoting carer support and helping Primary Care Networks embed Carer Friendly Quality Markers that were introduced in 2018. This is a CQC requirement and part of the NHS long-term plan.

1.22. **Enabling Spaces**

Enabling Spaces deliver specialist support and intervention to people with issues around compulsive hoarding. The service works with people in complex situations which can take up to two years of intensive work to resolve. When the grant commenced it was anticipated that they would work with around 20 people per year. But to date over 70 people have received support with a waiting list of 30 people. Referrals are accepted from a number of sources including GPs and Children's Services.

1.23. **Hope Coventry**

Hope Coventry deliver the Good Neighbours project to deliver befriending and support to older people. This includes one to one befriending and a platform for small local community projects aimed at reducing isolation and nurturing local connections through publicised friendship groups. Support is provided to approximately 360 people per year.

1.24. **Grapevine**

Grapevine provide two different grant funded services as follows:

- 1.25. Healthy Communities Together (HCT). The HCT partnership is one of five nationally which is majority funded by The National Lottery Community Fund, with learning support from The King's Fund. It is made up of Coventry and Warwickshire Partnership NHS Trust, Coventry City Council's Public Health Department and Grapevine. The overall aim of the HCT is to provide insight into how the voluntary and statutory sectors can work in partnership and on a fairer basis in the future and to ensure the statutory sector supports a thriving and sustainable voluntary sector.
- 1.26. The funding supports a dedicated role to build community asset and resource as part of the wider programme. This will result in sustainable examples of action on health, led and owned by community groups and residents.
- 1.27. Help and Connect. Help and Connect service is provided to people with learning disabilities or autism who do not receive support from ASC. Support they provide includes health training, one-to-one work with people at risk of harm and abuse, supporting people into work, future planning, supporting people to make connections and friendships, and workshops on topics such as safety and relationships.
- 1.28. The service exceeds its target of 80-120 people accessing the service per year, with an average of 140 people receiving support. Since the start of the grant the service has directly supported 496 people with a learning disability and or autism. The service therefore plays an important role in diverting people from Adult Social Care.
- 1.29. **Involve**  
Involve are a small organisation that have been successful in developing a grassroots service which adapts to meet changing needs. They offer a valuable service which empowers people with a range of mental health conditions to develop solutions that suit them. The service is particularly valuable for people who struggle to access other mental health services, and one user reported that the personalised, less formal approach offered by the service had recently diverted him from suicide, while others reported a reduction in hospital admissions due to support they receive from the group.
- 1.30. The service operates a virtual offer alongside a face-to-face service. The service is particularly valuable as a smaller, more personalised offer for those who prefer this.
- 1.31. Involve have used the City Council grant to attract additional grants to meet identified needs, attracting funding for projects such as gym and swim, computer access, visits to inpatient units, walking groups and projects on minimising energy use at home and food poverty for families.
- 1.32. **Mind**  
Mind 'Wellbeing for Coventry' deliver community-based preventative support for people with a wide range of established and emerging mental health needs. The service is delivered by Coventry and Warwickshire MIND in partnership with Tamarind and Sahil with the aim of being able to reach and support diverse communities through a model that includes a recovery academy, wellbeing hubs and limited-term one-to-one interventions.
- 1.33. In 2021/22, the service supported 272 people with targeted one-to-one support, Pathfinder supported 208 people with specific difficulties they were experiencing, 251 people attended 59 Recovery Academy courses, and 9,543 visits were made to the Wellbeing Hubs.
- 1.34. The service offers both a telephone/virtual support model as a primarily face-to-face contact-based service. Overall satisfaction with all the services is high with 94% of service users reporting that the service improved their mental health, wellbeing and independence and 82%

reporting that they felt more safe and secure in the community. In a survey of 350 people using the service, 46 stated that they would have attended A&E had the support not been there.

**1.35. Moat House Community Trust**

Moat House Community Trust are match funded by Sowe Valley Primary Care Network, to deliver the Community Navigator project. This identifies vulnerable and isolated members of the community and connects them with people and organisations that can help reduce isolation and improving their wellbeing. The service aims to grow the capability of individuals and communities to reduce the need for social care and health services.

1.36. During 2022 the Community Navigator role has been proactively reaching, re-connecting and encouraging (often reluctant) residents to re-engage in activities and events. The service aims to support 200 people per year.

**1.37. Trident Reach**

Trident Reach deliver housing related support to people with a learning disability. The expectation was that the service supported 60 people per year, but numbers have been lower due to needs of service users being more complex than anticipated with 17 service users staying longer than the planned 24 months. However, the service performs well against the strategic outcomes of improving wellbeing health and independence and provides an important support service meeting a group of service users who, if not supported, would access ASC or be at increased risk of losing their tenancy.

**2. Options considered and recommended proposal**

**2.1. Option 1: Recommended option – Issue further grants for up to two years to 31 March 2025.**

It is recommended that grants totalling £5,406,000 be awarded to voluntary sector organisations for a period of up to two years to 31 March 2025, for similar purposes to existing grants detailed in this paper. This would be following a short bidding process to minimise instability for Coventry's voluntary and third sector and the impact on citizens. A two-year grant enables the City Council to better understand its ongoing resource position plus how the voluntary sector can best be supported by the City Council to support vulnerable adults and older people within the city.

Over this grant period a mechanism for ensuring continued value for City Council resources and the delivery of positive outcomes would be established which may include a combination of both grants and contracts.

**2.2. Option 2: Not Recommended - Not renewing the grants.** Whilst this would create a saving for the Council initially, the impact would be significant on many of the more vulnerable members of our community. Additionally, ceasing to provide these services would increase pressure on social care and health services, with people coming to services later and in greater need. It is therefore recommended that we continue to fund these services.

**2.3. Option 3: Not Recommended - Awarding grants for five years.** This would ensure continuity and stability of services, and a longer grant period is more resource-effective for the Council. Grants allow for changes to models throughout the period, which would enable services to meet changing needs to a degree. However, given the current financial position, renewing the grant programme for such a long period is not recommended as it may be possible to identify savings, or this level of investment may not be possible to sustain for the next five years.

- 2.4. **Option 4: Not Recommended - Tender for services.** Undertaking a tender for services would enable the market to be tested to determine what alternatives for supply were available and as an end product would result in organisations being on clear contractual arrangements where they were accountable for delivery. Although some of the services provided through the grants could be delivered through establishing a contract there would be significant instability and uncertainty in the meantime which is not advisable at present.

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

- 3.1. Grant recipients were involved in an engagement exercise on the future of the grant which took place on 8<sup>th</sup> September 2022. Providers expressed continuing need for their services and a desire to continue providing them. A five-year grant would be preferred to provide stability for services. Individual conversations have also been held with each organisation.
- 3.2. Referrers within the Council have also been consulted about how they use the services and any impacts of ceasing to provide the service. This has been reflected in the impact assessment.
- 3.3. Should the recommended option be approved then over the two-year grant period consultation will continue to take place with service users and interested members of the public via surveys and focus groups.

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

- 4.1. Should the additional two years of grant funding be approved, a short bidding process will be offered to the market, with a view to commencing new arrangements from April 2023.
- 4.2. The two-year grant period will be used to design a longer-term service model within available funding and implement this through a further series of grants and/or contracts as appropriate.

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

#### **5.1. Financial Implications**

It is proposed that Cabinet approves grants in the sum of £5.406m (£2.703m per annum) to voluntary sector providers over a period of up to two years. This is funded from a mixture of funding across the Council and Coventry and Warwickshire ICB at £1.747m and £0.805m per annum respectively, alongside £0.151m per annum of iBCF grant.

#### **5.2. Legal Implications**

The Care Act 2014 makes clear that in performing its functions under the Act "*The general duty of a local authority, in exercising a function...in the case of an individual, is to promote that individual's wellbeing*".

The Act also introduced a specific requirement for local authorities to focus on the prevention, reduction, or delay in development by adults in its areas of needs for care and support, and by carers in its needs for support. The local authority has considerable discretion in how it chooses to meet its responsibility so as to be able to flexibly respond to the specific requirements of adults and carers in its area.

Public authority decision makers are under a non-delegable ongoing duty to have regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic (disabilities, age, gender

reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation). (Public sector equality duty, s 149(1) Equality Act 2010). Decision makers must be consciously thinking about these aims as part of their decision-making process, with rigour and an open mind. The duty is to have “due regard” not to achieve a result, but to the need to achieve these goals and consideration must be given to the potential adverse impacts and the measures (if any) that are available to minimise any discriminatory effects. Members must therefore ensure that they read all relevant papers to enable them to assess the risk and extent of any adverse impacts and the ways in which any such risk can be eliminated. This requires more than just an awareness of the equality duty; it requires rigorous analysis by the public authority beyond broad options.

The grant funding will follow a bidding process to enable voluntary sector organisations to bid for the grant funding which their organisation requires and demonstrates why they require the amount being requested. As the Council is following such a process this is compliant with the Subsidy Control Act 2022.

## **6. Other implications**

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

Continuing to offer the community-based Preventative Support Grant programme will make a positive contribution to the delivery of the Council's priorities, particularly in relation to citizens living longer, healthier, independent lives; supporting improved health and wellbeing; and reducing health inequalities.

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

There is a risk that grants coming to an end will mean provision is destabilised during a critical period in the cost-of-living crisis and continued Covid-recovery for our most vulnerable residents. This risk will be mitigated by using a short bidding process for similar services, meaning if the provider changes, service users will be able to access a similar service, minimising disruption.

As requirements for a grant cannot be as prescriptive as a contract awarded through a formal tender process, providers will not be contractually obliged to deliver the service. Should any provider not deliver the grant outcomes required the council would have the option to remove or reduce the grant. A regular review process will be followed to support organisations in meeting objectives. There will also be a notice period within the grant should either party wish to withdraw.

Should the support to the voluntary and third sector cease or reduce as a result of ending the grant programme the demand into the City Council would further increase. There is a risk that some services may not be bid for, as a two-year grant may be unattractive for organisations. The risk will be mitigated through market stimulation and offering a short, simple bidding process to reduce the burden on the voluntary and third sector.

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

None.

#### 6.4. Equalities / EIA?

Grants awarded under this programme support people with a range of protected characteristics. An analysis of equality impacts has been completed to understand the impact that continuing, and removing, services would have. Our recommended option would have a positive impact on groups such as older people, those with learning disabilities, sensory impairments and mental health conditions, and carers by ensuring services remained available to offer them support. The EIA is attached at Appendix One.

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

None.

#### 6.6. Implications for partner organisations?

The Preventative Support Grant programme is specifically concerned with the voluntary and community sector in Coventry. The funding is jointly provided by the Council and Coventry and Warwickshire Integrated Commissioning Board, continuing integration between the organisations.

#### Report author(s):

Name: Sharon Atkins

Title: Joint Commissioning Manager

#### Service: Commissioning

#### Tel and email contact:

Tel: 02476 977130

Email: Sharon.atkins@coventry.gov.uk

Enquiries should be directed to the above person

<b>Contributor/appr over name</b>	<b>Title</b>	<b>Service Area</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Lara Knight	Governance Services Officer	Law and Governance	14/11/22	18/11/22
Jon Reading	Head of Commissioning and Quality	Adult Services	14/11/22	15/11/22
Sally Caren	Head of Social Work – Mental Health and Sustainability	Adult Services	14/11/22	15/11/22
Neil Byrne	Commissioning Service Manager	Adult Services	14/11/22	18/11/22
Valeri De Souza	Consultant in Public Health- Insight and Communities	Public Health	14/11/22	15/11/22

Ewan Dewar	Finance Manager	Finance and Corporate Services	14/11/22	14/11/22
Janice White	Team Leader – Legal Services	Law and Governance	14/11/22	17/11/22
Gurbinder Singh Sangha	Corporate and Commercial Lead Lawyer	Law and Governance	17/11/22	18/11/22
<b>Names of approvers for submission:</b>				
Barry Hastie	Chief Operating Officer (Section 151 Officer)	Finance	21/11/22	
Julie Newman	Director of Legal and Governance	Law and Governance	17/11/22	17/11/22
Pete Fahy	Director of Adult Services and Housing	Adult Services	14/11/22	18/11/22
Cllr Mal Mutton	Cabinet Member for Adult Services	-	17/11/22	21/11/22

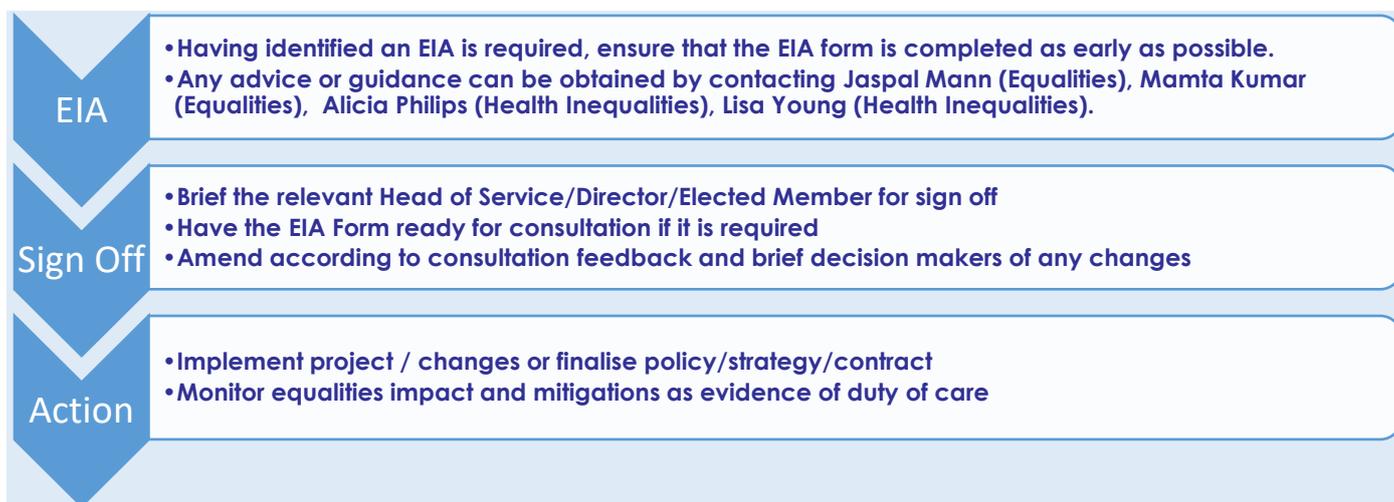
This report is published on the council's website: [www.coventry.gov.uk/meetings](http://www.coventry.gov.uk/meetings)

This page is intentionally left blank

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



<b>Title of EIA</b>	<b>Adult Social Care Preventative Support Grants</b>	
<b>EIA Author</b>	Name	<b>Sharon Atkins</b>
	Position	<b>Joint Commissioning Manager Dementia and Mental Health</b>
	Date of completion	<b>10.11.2022</b>
<b>Head of Service</b>	Name	<b>Jon Reading</b>
	Position	<b>Head of Commissioning and Quality</b>
<b>Cabinet Member</b>	Name	<b>Cllr Mal Mutton</b>
	Portfolio	<b>Adult Services</b>



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

### SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (*please give details*)



### 1.2 In summary, what is the background to this EIA?

Since 2018, a Preventative Support programme has been operating in Coventry, delivered by voluntary and community sector organisations that support people with mental health needs, learning disability, dementia, physical health needs, older people, and those with caring responsibilities. The grant programme has successfully delivered support to thousands of Coventry residents, including one-to-one support around learning disabilities, mental health, and sensory impairments; carers' assessment and support; support and information for people with dementia and their families; support for people who hoard; online and face-to-face courses to improve and understand mental health; and specialist advice and guidance. It is recommended that the grants programme is now extended for a further two years to enable continued support to people through Covid recovery and the cost of living crisis. Additionally, several IBCF grants for community projects are being brought under the programme.

### 1.3 Who are the main stakeholders involved? Who will be affected?

- People living in Coventry, especially those with mental health concerns, learning disabilities, dementia or sensory impairments, and older people and carers.
- Voluntary and third sector organisations.
- The City Council
- Coventry and Warwickshire Integrated Commissioning Board

### 1.4 Who will be responsible for implementing the findings of this EIA?

Sharon Atkins – Joint Commissioning Manager for Dementia and Mental Health

## SECTION 2 – Consideration of Impact

*Refer to guidance note for more detailed advice on completing this section.*

In order to ensure that we do not discriminate in the way our activities are designed, developed, and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation, and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



- Foster good relations between persons who share a relevant protected characteristic and those who do not

### 2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)



The grants cover a large number of people from different protected characteristic groups.

### **Age**

Coventry has a relatively young population, with a median age of 32 years compared to the UK average of 40 years. 65% of the population are of working-age (18-64), and 13% are aged 65 and over. The grants seek to provide support for emerging needs, and reflect the age profile of the city.

All grants are awarded for projects that work with people aged 18+, though this will include parents of those aged under 18 who will indirectly benefit from continuing to provide the services. All grants will be for support for people of all age groups, though there are some more geared towards or used more by certain age groups. For example, current services that particularly work with the 18-64 age group are Anjuman, Birmingham Institute for the Deaf (BID), Carers' Trust, Enabling Spaces, Grapevine, Involve, Mind and Trident Reach. Age UK, Alzheimer's Society, Hope Coventry and Moat House Community Trust tend to work more with people in the 65+ category.

### **Disability**

Again, all grants are awarded for projects that are open to those with a disability, but there are some that are particularly tasked with supporting people with a specific type of disability. For example, currently, BID work with (and also employ) people with a sensory impairment, supporting them to access mainstream services. Alzheimer's Society support people with dementia and their carers, and Grapevine and Trident Reach focus on support for people with a range of learning disabilities. Anjuman, Enabling Spaces, Involve and Mind support people with severe (as well as emerging) mental health conditions. Funded services seek to compliment statutory and health services, often aiming to help people avoid or delay needing to access these services.

PANSI (Projecting Adult Needs and Services Information projections provided by Institute of Public Care) estimates for 2020 suggest that in Coventry, of 246,700 people aged 18-64:

#### Mental health

- 46,221 have a common mental health condition
- 5,872 have a borderline personality disorder
- 8,404 have an antisocial personality disorder
- 1,726 have a psychotic disorder
- 17,728 have two or more psychiatric disorders

#### Physical conditions

- 10,379 have impaired mobility
- 7,655 have a moderate personal care disability
- 1,808 have a severe personal care disability

#### Sensory impairment

- 160 have a severe visual impairment



- 1,131 have severe hearing loss

### Learning disabilities

- 6,115 have a learning disability, with 1,392 of these being moderate to severe
- 154 people have Downs syndrome
- 111 of those with a learning disability are predicted to display behaviour that challenges
- 2,540 have an Autistic Spectrum Disorder

### Dementia

- 76 have early onset dementia

POPPI (Projecting Older People Population Information System projections provided by Institute of Public Care) estimates for 2020 suggest that in Coventry, of 50,700 people over 65:

### Mental health

- 1,389 have severe depression

### Physical conditions

- 13,895 have a limiting long-term illness that affects their day to day living a lot
- 9,405 are unable to manage at least one mobility task independently

### Sensory impairments

- 4,512 have a moderate or severe visual impairment
- 4,099 have severe hearing loss

### Learning disabilities

- 1,056 have a learning disability, with 141 of these being moderate to severe
- 471 have an Autistic Spectrum Disorder

### Dementia

- 3,647 are living with dementia

### **Race and Religion or Belief**

Over the past decade, the City has become increasingly ethnically diverse, with just under half of its school-aged population from an ethnic minority background in 2021; up from around one-third of the city's population from an ethnic minority background at the 2011 census. POPPI estimates suggest that of over 65s in the city, 90% are White, 8% Asian or Asian British and 2% Black Caribbean, African or British. For 18-64 year olds 73% are White, 18% Asian or Asian British and 6% Black Caribbean, African or British. Additionally almost 2% of this age group are of mixed ethnic group and 2% from another ethnic group.



All preventative support services are expected to reflect the makeup of our local population in who they support, though it is acknowledged that some services are currently more successful than others in reaching a diverse group, and in some cases specific efforts are required to achieve this. Mental health, learning disability and dementia, as well as being a carer still have a stigma amongst some groups, so services have worked to reduce this. Additionally, traditional services sometimes inadvertently put off people from certain communities and religious or ethnic groups, so it is important that this is continually under review and efforts are made to deliver culturally sensitive and relevant services to all.

For example, amongst currently funded services, in mental health services, the Mind offer includes two satellite hubs based in primarily Asian and Afro-Caribbean communities which are geared specifically to attracting people from these groups who require support. Likewise, Anjuman offer a particularly culturally sensitive supported accommodation service, and BID are also particularly successful in supporting people from BAME communities, at almost half of those using their services. Specific projects are currently being delivered by some organisations to increase access for people from BAME communities, for example a project with temples at Alzheimer's Society. The Carers Trust employ a dedicated Wellbeing Advisor, specialising in Equality, Diversity and Inclusion, whose role and responsibilities involve engagement with community organisations, faith centres etc. The role has developed links with the Afro-Caribbean Society, Broadstreet community centre and attended numerous events to talk about the role of caring in local communities. The role has also worked strategically with public health in the uptake of vaccinations for carers from underrepresented groups. Hope Coventry is run by a collective of Coventry churches bringing together different denominations to support people from any or no religion in the city.

Continuing to offer services in a way that is accessible and attractive to our diverse community remains a priority and will be a condition of new grants issued. Recent engagement with a group of voluntary sector services on mental health support for people from BAME communities has identified a number of lessons that will be reflected to the wider group of organisations.

### **Gender Reassignment and Sexual Orientation**

Services tend not to collect data on gender reassignment or sexual orientation but are required to have an understanding of protected characteristics and provide a service taking into account people's individual needs. Therefore members of these groups will also experience a positive impact under the recommended option. However, mental health support may be particularly relevant to some people in these groups, and our mental health offer could include specific support if an otherwise unmet need was identified. People who are transgender are four times more likely to experience depression, and have reported experiencing distress related to discrimination, violence and health inequalities. Likewise, people who are LGBTIQ+ are more likely to experience mental health conditions, often triggered by experiences such as discrimination, homophobia, social isolation, rejection or difficult experiences of coming out. Should a specific unmet need be identified for this group this could be provided through our mental health offer. Currently, the Carers Trust employ a dedicated Wellbeing Advisor who has done specific work with carers from LGBTIQ+ groups.



### **Pregnancy and Maternity**

No grants are for services geared specifically towards this group, but all would be open to people with this characteristic, and services do not tend to collect this information. Mental health can suffer during pregnancy and soon after becoming a parent, so while there is a specific perinatal mental health offer available via health services in Coventry, people may access mental health services under this offer for the first time or more frequently during this part of their lives, from which they could be supported and signposted as required. Around 15% of women experience mental health issues during pregnancy or soon after the birth of their child.

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

*\*Any impact on the Council workforce should be included under question 2.6 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	While the scope of the grants programme is people aged 18+, funded organisations have demonstrated a positive impact on families, including a project to address food poverty for families where an adult has a mental health issue. Continuing to support adults through the cost of living crisis will enable affected parents to better support their children.
Age 19-64	P	People in this age group are supported primarily through the mental health, learning disability, sensory impairment and carer grants. Continuing to fund these services will have a positive impact on this group as they will remain able to access this support. However, other services also support people in this age group – a small number of people will access dementia support with early onset dementia, and many more as carers. Age UK currently offer support and information for all those over 18, and volunteering opportunities are currently provided by other organisations which enhance the wellbeing of people in this age group.
Age 65+	P	Much of the work of currently funded organisations such as Alzheimer’s Society, Hope Coventry, Moat House Community Trust and Age UK is accessed by people aged 65+, so continuing to provide services in these areas offers a positive impact for this group. Organisations help older people access the services and local support they need, and work to reduce isolation for many older people and support them to build relationships within their communities, enhancing their health and wellbeing. As the analysis

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



		above highlights, older people are also affected by learning disabilities, mental health needs, sensory impairments and caring responsibilities, so we will continue to ensure grants are used for services to support people in this age group.
Disability	<b>P</b>	Many of the grants under this programme support people with specific disabilities or long-term conditions. Currently, Alzheimer's Society, Grapevine and BID work specifically with people with disabilities, and the mental health organisations, alongside supporting people with emerging support needs, support people with severe and enduring mental health conditions that would fall under this category. These services help people with disabilities navigate mainstream services and their communities, mitigating against the barriers posed by their disability and increasing equity for this group. Removing these services would have a significant negative impact on this group.
Gender reassignment	<b>P</b>	People who are transgender are four times more likely to experience depression, and have reported experiencing distress related to discrimination, violence and health inequalities. Should a specific unmet need be identified for this group this could be provided through our mental health offer. People within this group are able to access all of the services so would benefit from continued funding.
Marriage and Civil Partnership	<b>NI</b>	
Pregnancy and maternity	<b>P</b>	Mental health can suffer during pregnancy and soon after becoming a parent, so while there is a specific perinatal mental health offer available via health services in Coventry, people may access mental health services under this offer for the first time or more frequently during this part of their lives. Around 15% of women experience mental health issues during pregnancy or soon after the birth of their child, so continuing to fund mental health preventative support will have a positive impact on this group.
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>P</b>	All services are open to people from all races, but there are certain currently funded services that are especially successful in supporting people from minority ethnic groups, for example Anjuman, Sahil and Tamarind (part of the Mind service) and BID. People from these groups are often under-represented in support services, so removing these services would have a specifically negative impact on this group. All organisations strive to provide

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



		culturally sensitive services, but we will continue to take into account the need for specific offers for people from BAME groups where needed, and we will use the provider forum to ask particularly successful organisations to share knowledge with others, and will reflect findings from a recent engagement exercise on mental health provision for people from BAME backgrounds in how we deliver and develop services.
Religion and belief	<b>P</b>	<p>All services are open to people from all religions, but there are currently certain services that are especially successful in supporting people from minority religious groups, for example Anjuman, Sahil and Tamarind (part of the Mind service) and BID. People from these groups are often under-represented in support services, so removing these services would have a specifically negative impact on this group. All organisations strive to provide culturally sensitive services, but we will continue to take into account the need for specific offers for people from BAME groups where needed, and we will use the provider forum to ask particularly successful organisations to share knowledge with others.</p> <p>Additionally, we currently fund Good Neighbours, a church-based initiative bringing together different denominations to support the wider community. Continuing to provide funding supports collaborations such as this.</p>
Sex	<b>NI</b>	
Sexual orientation	<b>P</b>	<p>People who are LGBTIQ+ are more likely to experience mental health conditions, often triggered by experiences such as discrimination, homophobia, social isolation, rejection or difficult experiences of coming out. Should a specific unmet need be identified for this group this could be provided through our mental health offer. People within this group are able to access all of the services so would benefit from continued funding.</p>

### HEALTH INEQUALITIES

<b>2.3</b>	Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.
------------	---



<p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics, and experiences, such as age, gender, disability, and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p><b>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</b></p> <p><b>If you need assistance in completing this section, please contact: Alicia Philips or Lisa Young in Public Health for more information. More details and worked examples can be found at <a href="https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx">https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</a></b></p>	
Question	Issues to consider
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> <li>● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>)</li> <li>● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation</li> </ul>
	<p>Response:</p> <p>Services delivered under this grant programme support people from groups that often experience health inequalities including lower-life expectancy, poorer health and difficulties accessing mainstream health services (including health screenings), including people with mental health conditions, learning disabilities and sensory impairments. People with learning disabilities often have comorbidities, and medication for severe mental health conditions can have side effects that affect the health of the patient, particularly when a combination of drugs are required to stabilise mental health. Additionally, carers, older people and those with limited mobility or who are socially isolated are less likely to access screenings and address health concerns early due to access issues. This can exacerbate health issues meaning they are more serious when they are identified, and therefore prognosis poorer. People with dementia or learning disabilities are also at risk of receiving less effective or later care for other health concerns due to issues with communicating pain or health needs.</p>



	<p>There is not an equal likelihood of having good physical and mental health in England. Risks for poor physical health and poor mental health are higher for people in lower socioeconomic groups, some BAME groups and for women. People from households with the lowest income are 30% less likely to take part in physical activity.</p> <p>Women, people from BAME communities, carers, people with a history of unemployment or unstable, poorly paid employment, manual workers, and people living in areas of deprivation are at a greater risk of isolation, physical inactivity, and lack of mental stimulation because of the environments and circumstances in which they live. Poverty and low income, living alone, caring responsibilities, living in poor housing conditions or degraded neighbourhoods, lack of access to green space and learning opportunities prevent people from remaining socially connected, physically active and mentally stimulated, increasing their risk of health concerns.</p>
<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p><b>Consider and answer below:</b></p> <ul style="list-style-type: none"> <li>● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income</li> <li>● Consider what the unintended consequences of your work might be</li> </ul>
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>Currently funded organisations deliver across the City, but some projects focus specifically on areas where people have greater health inequalities. For example:</p> <ul style="list-style-type: none"> <li>- Grapevine are running a community pilot in Willenhall.</li> <li>- Sahil and Tamarind (via Mind grant) operate Wellbeing Hubs in more deprived communities, and in areas that are easily accessible by local people.</li> <li>- Age UK offer support and information with a wide range of issues people may experience, including related to socio-economic status.</li> </ul>



We will continue to require that funded organisations take these needs into account and that all face-to-face work is delivered in accessible venues to as many people in the City as possible.

- b. Potential outcomes impact on specific socially excluded or vulnerable groups e.g. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

All services funded under this grant must work towards outcomes which include improved health and wellbeing for people they support. Some examples of specific work to address health inequalities by currently funded organisations include:

- Grapevine support delivery of annual health checks for people with learning disabilities, meaning emerging health concerns can be identified.
- Sahil and Tamarind (via the Mind grant) work specifically in BAME communities where disproportionately low use of mental health services has been identified. They undertake specific activities to destigmatise mental health and encourage members of these communities to access support, including speaking on local radio programmes and running cooking and social groups that also offer mental health support.
- Carers Trust deliver Carers Assessments which identify the specific needs of the carer. Carers often experience health inequalities due to a focus on the needs of the cared for person.
- Good Neighbours seeks socially isolated older people and connects them with volunteers and their local community, improving their wellbeing.
- Mind offer support for people with mental health conditions to access services, supporting them to attend appointments and identify ways to improve their health and wellbeing. Mind's Recovery Academy runs courses to meet identified needs, which include focus on staying well with certain conditions.

We would expect funded organisations to continue taking initiatives such as these to tackle health inequalities. Organisations will be monitored to ensure they remain vigilant to any health inequalities inadvertently affecting people in the way they deliver services – for example where there are comorbidities (e.g. ensuring the mental health offer is accessible to people with a learning disability).

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?



- Ensure EIA is considered and regularly reviewed as part of development with services and monitoring.
- Possible inequalities and ways to address these will be explored as part of individual work with providers and also provider forums.
- Provider forums will be used to develop relationships between organisations and ensure comorbidities are catered for in service delivery.
- Coproduction activity will be increased, ensuring groups are as representative as possible. Potential barriers to access will be explored and mitigated.

### DIGITAL INCLUSION

<p><b>2.5</b></p>	<p>The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English (<a href="#">NHS Digital.</a>)</p> <p>Some of the barriers to digital inclusion can include lack of:</p> <ul style="list-style-type: none"> <li>• <b>Access</b> to a device and/or data</li> <li>• <b>Digital skills</b></li> <li>• <b>Motivation</b> to get online</li> <li>• <b>Trust</b> of online safety</li> </ul> <p>Digital exclusion is not a fixed entity and may look different to different people at different times.</p> <p>Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.</p> <p>Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.</p> <p>Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for</p>
-------------------	---

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



<p>alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.</p> <p>It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.</p> <p><b>Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.</b></p> <p><b>If you need assistance in completing this section please contact: Laura Waller (<i>Digital Services &amp; Inclusion Lead, CCC</i>). More details and worked examples can be found at <a href="https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx">https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</a></b></p>	
Question	Issues to consider
2.5 What digital inequalities exist in relation to your work / plan / strategy?	<ul style="list-style-type: none"> <li>• Does your work assume service users have digital access and skills?</li> <li>• Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access?</li> <li>• Consider what the unintended consequences of your work might be.</li> </ul>
	<p>Response:</p> <p>Services do not assume people have digital access and skills. While many of our existing providers moved to a more digital offer during the pandemic and in many cases an element of this has been retained, all organisations will be required to also provide a face to face offer to ensure they remain accessible to all.</p>
2.5b How will you mitigate against digital inequalities?	<ul style="list-style-type: none"> <li>• If any digital inequalities are identified, how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.</li> </ul>
	<p>Response:</p> <p>We will continue to monitor organisations' use of digital and face to face offers. Current services such as Age UK and Alzheimer's Society actively support people who are digitally excluded by offering telephone or face to face information that others may access via the internet. We will ensure that engagement does not rely solely on an online offer.</p>

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



--

### 2.6 How will you monitor and evaluate the effect of this work?

This will be monitored and evaluated through quarterly grant monitoring with each organisation, and via the provider forum where organisations will be asked to share experiences and expertise.

### 2.7 Will there be any potential impacts on Council staff from protected groups?

There may be positive impacts on council employees who use these services as individuals, but numbers are not available.

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: [Nicole.Powell@coventry.gov.uk](mailto:Nicole.Powell@coventry.gov.uk)

#### **Headcount:**

#### **Sex:**

Female	
Male	

#### **Age:**

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

#### **Disability:**

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

#### **Ethnicity:**

#### **Religion:**

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	

## Appendix 1 EQUALITY IMPACT ASSESSMENT (EIA)



White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Prefer not to state	
Unknown	

### **Sexual Orientation:**

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

### 3.0 Completion Statement

**As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:**

No impact has been identified for one or more protected groups

Positive impact has been identified for one or more protected groups

Negative impact has been identified for one or more protected groups

Both positive and negative impact has been identified for one or more protected groups

### 4.0 Approval

<b>Signed: Head of Service:</b>	<b>Date: 17/11/22</b>
<b>Name of Director: Pete Fahy</b>	<b>Date sent to Director: 17/11/22</b>
<b>Name of Lead Elected Member: Councillor Mal Mutton</b>	<b>Date sent to Councillor: 17/11/22</b>



Email completed EIA to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk)



---

**A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains details relating to any individual and financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.**

Cabinet

13 December 2022

**Name of Cabinet Member:**

Cabinet Member for Housing and Communities - Councillor D Welsh

**Director approving submission of the report:**

Director of Public Health and Wellbeing

**Ward(s) affected:**

ALL

**Title:**

Refugee Resettlement and Newly Arrived Communities

---

**Is this a key decision?**

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

---

**Executive summary:**

The purpose of the report is to:

1. Update Cabinet on the current position concerning the arrival and welcome of people from asylum seeking, refugee and migrant communities into the city.
2. Reflect on work done under a range of resettlement schemes as set out in Appendix 3 as well as the grant allocations awarded to the Council to support the delivery of these resettlement schemes which is shown in Appendix 1.
3. Seek confirmation of the Council's preferred position regarding the dispersal of asylum seekers in the city in line with the Government's new Full Dispersal policy. Both Coventry and the wider West Midlands are disproportionately impacted by the current dispersal of asylum seekers; the local authority along with other regional partners has for a number of years advocated for a

fairer dispersal system. The West Midlands Strategic Migration Partnership has developed a regional plan of allocation as set out in Appendix 2, which should see local numbers drop, over time. However, this will require early action by the Home Office to exit contingency asylum hotels to see numbers drop more quickly. The Council has no obligation to agree the regional plan of allocation; however, it is recommended that the Council support the plan in order to establish an equitable dispersal of asylum seekers.

4. Set out the current and projected challenges and opportunities, presented by refugee resettlement, as well as the potential benefits to the local economy and communities from investing in a successful approach to resettlement, inclusion and integration.
5. The Council's Migration service also bid for and receive a range of grants which fund specific projects to support the same communities. This report therefore seeks approval to accept further grant funding under the Asylum, Migration and Integration Fund (AMIF) which will be used to extend the My Coventry project by a further 12 months.
6. Seek approval for the Council's pledge to the Government's various refugee resettlement schemes.
7. Note the acceptance of all relevant grant allocations awarded to the Council from the Home Office and Department for Levelling Up, Housing and Communities under the grant schemes included in Appendix 1.

Cabinet should be made aware that this report does not cover Unaccompanied Asylum-Seeking Children as this client group are supported by Children's Services.

### **Recommendations:**

Cabinet is requested to:

1. Approve the proposed regional model put forward by the West Midlands Strategic Migration Partnership to disperse people who are asylum seekers across the West Midlands region, as set out in Appendix 2. As set out in section 1.5 providing information on 'Move to Full Dispersal' policy and described in Option 2 of the Options and Recommended proposal section.
2. Reaffirm the position of Coventry as a City of Sanctuary, City of Peace and Reconciliation and continue to be a welcoming and inclusive place for people from asylum seeking, refugee and migrant communities. This is with a particular emphasis on supporting new arrivals to be able to make a positive contribution to local communities and the local economy.
3. Confirm the Council's pledge to resettle 125-150 people per annum from the Government's Resettlement Schemes. This would reflect the capacity in the city to support these very vulnerable refugees and make a positive contribution to the Government's request for support with the challenges faced particularly by the collapse of the previous Afghan regime in August 2021.
4. Delegate authority to the Director of Public Health and Wellbeing following consultation with the Chief Operating Officer and Cabinet Member for Housing and Communities to be able to increase or decrease the Council's pledge to the Government's refugee resettlement schemes. This would be in accordance with Coventry's capacity to deliver effective integration support and would be based on the population size of the city.
5. Authorise the Cabinet Member for Housing and Communities following consultation with the Head of Service Libraries and Migration and the Chief Legal Officer to prepare and thereafter issue a letter to the Home Secretary stating the following:

- That the City Council remains supportive of the West Midlands Strategic Migration Partnership's plan which reflects the move to a new and better dispersal model;
  - That the current contingency hotels are stood down in the City of Coventry; and
  - No further contingency hotels are to be created in the future within the City of Coventry
6. Accept all government grant allocations awarded to the Council per individual under the grant schemes programmes listed in Appendix 1 for current and future years and delegate authority to the Head of Service Libraries and Migration following consultation with the Chief Operating Officer and Cabinet Member for Housing and Communities to take all necessary actions to bring into effect this recommendation.
7. Authorise the Council to accept additional grant funding award of £794,753 from the Asylum Migration Integration Fund (AMIF) subject to the appropriate match funding being secured by all necessary delivery partners which shall thereafter be utilised to extend the current MyCoventry programme for a third year (ending December 2023) as described in Paragraph 1.10 below.
8. Delegate authority to the Head of Service Libraries and Migration following consultation with Chief Operating Officer and Cabinet Member for Housing and Communities to enter into the appropriate agreements:
- To secure the additional grant funding; and
  - Back-to-back funding agreement with the necessary delivery partners.

**List of Appendices included:**

The following appendices are attached to this report:

Appendix 1: Resettlement and asylum funding

The following appendices are attached in the private element of this report:

Appendix 2: West Midlands Strategic Migration Partnership - proposed model for regional allocation of dispersed asylum seekers

Appendix 3: Profile of the current schemes and projected arrivals

**Background papers:**

None

**Other useful documents**

[UNHCR - The UN Refugee Agency](#)

[Ukraine Visa Schemes: visa data - GOV.UK \(www.gov.uk\)](#)

[How many people do we grant asylum or protection to? - GOV.UK \(www.gov.uk\)](#)

[Coventry and Warwickshire Health Inequalities Strategic Plan 2022-2027](#)

**Has it or will it be considered by scrutiny?**

No

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

No

**Will this report go to Council?**

No

## Report title: Refugee Resettlement and Newly Arrived Communities

### 1. Context (or background)

- 1.1. Coventry is a diverse city which has a long association with inward migration, often with migrant groups finding a place of safety after conflict or persecution, but also for more economic-led reasons. The city regards itself as both a City of Sanctuary and a City of Peace and Reconciliation and has taken part in refugee relief efforts when the Government has requested assistance (e.g. refugees from Vietnam, Bosnia, Syria etc). In 1999, the city became a voluntary asylum dispersal area supporting the housing, education and integration needs of several hundred asylum seekers until this work was privatised in 2012.
- 1.2. According to the United Nations High Commissioner for Refugees (UNHCR), at the end of 2021 89.3 million people worldwide were forcibly displaced from their homes as a result of war, persecution and natural disasters. Whilst the majority of people are displaced within their own countries, 35% (31.7 million) fled to another country as refugees and asylum seekers, which is nearly double the number in 2011<sup>1</sup>.
- 1.3. Reflecting what's happening internationally, the picture in the UK has changed significantly in the last ten years, still more so in the last few. In response to crises around the world the UK has created various resettlement schemes and programmes to provide safe and legal routes to the UK. Refugee resettlement plays a key role in the global response to humanitarian crises and is a key theme of the Nationality and Borders Act 2022<sup>2</sup>.
- 1.4. The Council's Migration service are in the process of developing Coventry's first Integration Strategy for newly arrived communities here in the city. The strategy forms part of the City Council's Equality Objective 2<sup>3</sup>, '*Develop better understanding of our diverse communities in order to shape and deliver the Council's Integration policy and practice for the City and its residents*'. The strategy also aligns with the One Coventry Plan priority, '*Improving outcomes and tackling inequalities within our communities...supporting our most vulnerable – including the integration of our refugee and migrant communities*'<sup>4</sup>.
- 1.5. **Asylum Dispersal**
  - 1.5.1. The government sponsored resettlement schemes listed above all allow for legal entry into the UK for participants. Many other people choose to apply for asylum in the UK having arrived on small boats or through 'clandestine' routes (as described by the Home Office), or alternatively make asylum applications having previously arrived through legal routes (students visas, work visas, visitors etc).
  - 1.5.2. Reflecting the international picture, the number of asylum applications increased from 26,000 in 2011 to 56,000 in 2021<sup>5</sup>. This has placed significant pressure on the national system of dispersed accommodation and support provided by the Home Office. A large number of hotels were set up to provide additional capacity on a temporary basis (contingency accommodation) but in November 2022 it was estimated that of more than 40,000 asylum seekers remain in accommodation like this.
  - 1.5.3. Coventry currently has a significant number of asylum seekers in the city with most people accommodated in residential accommodation procured and managed by Serco (the Home

---

<sup>1</sup> [UNHCR](#)

<sup>2</sup> [The Nationality and Borders Act 2022](#)

<sup>3</sup> [Coventry City Council Equality Objectives 2022-25](#)

<sup>4</sup> [One Coventry Plan](#)

<sup>5</sup> [UK Asylum Applications data](#)

Office contractor). Nationally and across the West Midlands however the large numbers of new arrivals has meant that there has been a rapid establishment of contingency hotel accommodation, with limited consultation and no formal approval process. This has also affected Coventry. Further details are set out in the private element of this report.

1.5.4. Historically, the maximum number of asylum seekers in a local authority area is based on the population size and the established 1:200 ratio. One issue of significance is the Home Office do not consider hotel residents as part of the equation; however, the Council does consider that all asylum seekers placed within a local authority boundary should be included in the ratio. Further details are set out in the private element of this report. If approved and implemented, the WMSMP model proposed for a regional allocation of asylum seekers (Appendix 2) should see procurement of accommodation continue in almost all other localities in the West Midlands apart from Coventry. As hotels are stood down and property procurement concentrated elsewhere the expectation would be that Coventry numbers will decrease albeit over time.

1.5.5. Projections show that there will be up to 100,000 asylum seekers in the UK by December 2023 and the Home Office is working with local authorities to create a new model for full dispersal.

## 1.6. **Move to Full Dispersal**

1.6.1. In the West Midlands Coventry along with Birmingham, Dudley, Sandwell, Stoke-on-Trent, Walsall and Wolverhampton were previously regarded as voluntary asylum dispersal areas. In response to pressure from the historic authorities and sharply increased numbers of asylum seekers in the Home Office system, earlier this year the Government directed that all local authorities would be required to participate and be considered as 'dispersal areas'. Strategic Migration Partnerships have been tasked to work with local authorities and agree local models for the dispersal of asylum seekers within new regional quotas. If local authorities are unable to do this then the government will impose allocations directly through their contractors, using their own approach and methods.

1.6.2. The Government's new policy envisages a position where all local authorities will be expected to take a share of asylum seekers and thereafter receive government funding (to be finalised after undertaking a new burdens assessment). The full dispersal model is intended to reduce and end the use of hotels by allowing the Home Office to procure additional dispersal properties within the private rental sector in all local authority areas across England, Scotland and Wales rather than the minority of local authorities that currently volunteer to participate.

1.6.3. The City Council has requested for hotels to be stood down, further details are set out in the private element of this report. Hotels do not represent an appropriate option to accommodate asylum seekers. Lengths of stay can be very long, hotels can be located inappropriately (as is the case in Coventry) and are remote from relevant local services particularly specialist health care. Local authorities are often left to fill the gaps presented by the lack of Home Office provision.

1.6.4. Appendix 2 shows the proposed allocation of asylum dispersal for the West Midlands region. Further details are set out in the private element of this report.

1.6.5. Further details are set out in the private element of this report. Whilst the Home Office has committed previously to exiting hotels, there is not currently a detailed timeline for this to

happen, in fact still more hotels have been opened in the West Midlands during November 2022. The Council's view is that any hotels in Coventry should be stood down as soon as possible. Under this WMSMP proposal numbers would decrease proportionality in line with the 1:200 cap limit.

- 1.6.6. Appendix 2 shows the proposed allocation of asylum dispersal for the West Midlands region. Further details are set out in the private element of this report. The proposal represents a regional collaboration between local authority representatives.
- 1.6.7. **The City Council along with other historic dispersal areas will be monitoring closely the adoption of the full dispersal policy to ensure that Government commitments are followed through, the lack of fairness in the previous policy is removed, and pressure on local services reduced.**

## 1.7. Safe and Legal Routes – Refugee Resettlement Schemes

- 1.7.1. **There are a number of 'safe and legal' routes which allow people to travel to the UK either temporarily or with a route to settlement. Refugee resettlement schemes are funded by the Home Office and have a clear route to settlement:**

- ***UK Resettlement Scheme (UKRS) (2021-)***. To date this scheme has resettled over 1,500 people to the UK primarily from Syria, Iraq, Somalia, Sudan and Yemen. This scheme replaced the Vulnerable Persons Resettlement Scheme (2014)<sup>6</sup> and was intended for use by any refugee group identified by UNHCR requiring resettlement and fulfilling the criteria of the scheme. Coventry has received the numbers of refugees under UKRS from April 2021 – Sept 2022 as stated in the private element of this report.
- ***Syrian Vulnerable Persons Resettlement Scheme (2015-2020)***. To date this scheme has resettled 20,000 people from Syria to the UK. It has helped those in the greatest need, including people requiring urgent medical treatment, survivors of violence and torture, and women and children at risk. Coventry was one of the first authorities to participate and has welcomed the numbers of people through this scheme as stated in the private element of this report, which has now closed.
- ***Afghan Relocation Assistance Policy (ARAP) (2021-)***. This Scheme offers relocation or other assistance to former Locally Employed Staff (LES) that worked as interpreters and embassy staff in Afghanistan to reflect the changing situation in the country. The Scheme launched in April 2021 and remains open.
- ***Afghan Citizen Resettlement Scheme (ACRS) (2022-)***. The UK formally opened this scheme on January 2022 following the rapid withdrawal of troops from Afghanistan and the subsequent evacuation of 'vulnerable' individuals. The government pledged to resettle 20,000 people via its Afghan resettlement schemes over the coming years. There are currently 9,667 Afghan refugees in the UK who require pledges of accommodation, many of whom have been in temporary "Bridging Hotels" for several months whilst resettlement properties are identified<sup>7</sup>. Coventry has received the numbers of refugees stated in the private element of this report under both Afghan schemes from June 2021 – Sept 2022.

---

<sup>6</sup> [Vulnerable Persons Resettlement Scheme](#)

<sup>7</sup> [Afghan Resettlement Programme: operational data](#)

## 1.8. Other recent safe and legal routes

- **Hong Kong British Nationals Overseas (BNO) Welcome Programme (2021-)**. So far bringing nearly 120,000 people from Hong Kong to the UK<sup>8</sup>. The numbers of arrivals under this scheme are unlimited and based on visas being issued and individual decisions of Hong Kong people coming to the UK. Coventry has approximately the numbers of people set out in the private element of this report estimated to have settled in the city so far. The programme has only limited funding attached to support individuals when they find a home in the UK but does provide a route to settlement. The programme remains open, with regular arrivals.
- **Homes for Ukraine Scheme (2022-)**. So far bringing 96,800<sup>9</sup> people to the UK with over 231 people under this scheme arriving in Coventry so far (17.10.2022). The numbers are however unlimited depending on offers made by local residents with no government cap on the numbers of Ukrainians that can be supported at this time.
- **Ukraine Family Visa Scheme (2022-)**, so far bringing 37,400 to the UK. This scheme allows applicants to join family members or extend their stay in the UK. Currently there is no local data available, but it is estimated that around 140 people may have arrived in Coventry through this route. However, a large majority of people are still coming via the Homes for Ukraine scheme.
- The two Ukraine schemes are essentially temporary visa programmes which allow participants 3 years' leave to remain and access to work, benefits etc. They do not currently provide a route to settlement.

## 1.9. Government Scheme Facilitators

1.9.1. The numbers and nature of arrivals into Coventry is currently determined by the following Criteria which increasingly shows a move by Government to mandate local authorities to participate in support for newly arrived communities:

- **Citizen or applicant led**, where local authorities have no or little input to the number of new arrivals: Hong Kong BNO Welcome Programme; Homes for Ukraine Scheme; Ukraine Family Visa Scheme.
- **Government led**, where local authorities have been directed to participate, Asylum Dispersal; Unaccompanied Asylum-Seeking Children (UASC) via the transfer scheme.
- **Local authority led**, where local authorities can determine the scale and scope of arrivals: ARAP; ACRS, UKRS.

1.9.2. In practice the Council needs to ensure that it has sufficient means and capacity to meet its minimum obligations, which are primarily wrapped up in various grant conditions for the funding it receives from government for individual schemes. The city needs to be prepared to meet the short-term basic needs for advice and support for newly arriving and host communities. It is also based on the Council being prepared to take a reactive approach to action by Government or individuals, depending on regional and national pressures, and international movements of people.

---

<sup>8</sup> [British National Overseas arrivals data](#)

<sup>9</sup> [Ukraine Scheme Visa data](#)

## 1.10. MyCoventry Project Funding Extension

- 1.10.1. On the 13th October 2020 Cabinet accepted the successful award of funds to the Council and partners under the Asylum, Migration and Integration Fund (AMIF), amounting to £1.57m for the MyCoventry project. The City Council has secured further AMIF funding to extend the project<sup>10</sup> by a further 12 months (to run to 31.12.23) subject to all delivery partners providing their match funding. The initiative looks at addressing local, social, and economic inequalities that hinder the way young people and adults from migrant communities interact and become an integral part of Coventry. The extension will enable the project to continue to provide its existing services but with a shifted focus to include Ukrainian nationals.

## 2. Options and recommended proposal

- 2.1. There are two key options available to the Council in how it responds to the changing landscape and demands presented by the international displacement of people.

- 2.2. Option 1. Continue to engage with the changing landscape and demands and successfully integrate people from refugee and migrant communities - **Recommended**

- 2.2.1. Within this context, the recommended option is to continue to engage with these changing landscapes and demands and commit to a longer-term, proactive, planned approach to be managed subject to the Council's overall financial position.

- 2.2.2. This option recognises the current landscape as a new status quo and acknowledges that significant and sufficient adjustments maybe required to be able to successfully welcome, include and integrate people from refugee and migration communities. This includes proactive engagement with government and West Midlands Strategic Migration Partnership to inform and shape local, regional and national approaches.

- 2.2.3. As highlighted in this report, there are already a number of people who have recently arrived who will require continued support to permanently resettle in the city. Asylum dispersal (which is now effectively mandatory) provides a flow of people who will achieve legal status and evidence suggests that many will choose to stay in the city. Others, particularly Ukrainians are more likely to be more fluid in their approach to migration with a return to Ukraine, their objective subject to the resolution of the conflict. A breakdown and details of current schemes and projected numbers of arrivals is included in the private element of the report at Appendix 3.

- 2.2.4. There are unique challenges for each of these groups and individuals in how they acclimatise and integrate into life in the UK in general and Coventry in particular. These include people's experience of authorities and public services, their English language skills, employability, underlying health conditions and their age. There are also positive opportunities for the city if collectively we can enable them to overcome initial challenges, particularly concerned with housing, education, health, employment and skills, community integration and inclusion.

- 2.2.5. A further consideration is that the Council, its partners and local communities have rapidly been able to adapt and respond to the changing situation, different pressures and demands of different migrant groups. Through this response Coventry has shown that it has the capability to achieve successful resettlement, integration and inclusion of newly arriving communities. A few specific examples of this include:

---

<sup>10</sup> [MyCoventry project website](#)

- **Homes for Ukraine** – this has been driven by local people opening their homes to people from Ukraine. The Council has had a role in providing advice, support for sponsors but the success of the scheme in Coventry so far has been through the community response to welcome and include arrivals in local events, networks, groups, as well as to access services. At last count more than 620 Coventry residents had ‘expressed an interest’ in hosting a Ukrainian guest.
- Further details are also set out in the private element of this report.

#### Key Benefits to the City

- **Enhancing the city’s reputation, social and economic prosperity:** Adopting and promoting a position where Coventry is recognised as a welcoming and inclusive place for people who have been internationally displaced will be needed. This can be with a particular emphasis on supporting new arrivals to be able to make a positive contribution to local communities and the local economy, promoting the benefits and opportunities that come with successful resettlement and integration.
  - **Contributing to the Council’s ‘One Coventry Plan’:** Adopting this approach will help to integrate activity and investment concerning refugee and migrant communities within existing Council functions, strategies and priorities. This includes contributing to the Council’s ‘One Coventry Plan’ in particular to achieve the objective of *“Improving outcomes and tackling inequalities within our communities”*. This objective focuses on supporting our most vulnerable – including the integration of our refugee and migrant communities.
  - **Building the capacity and capability in public and voluntary sector services:** It will also enable more long-term investment in local capacity and capability to meet the new demands. There are significant pressures on school places, the local housing market, homelessness and access to NHS primary care services. Whilst it is not within the Council’s gift to place any significant limit on the numbers of new arrivals, it can develop local skills, expertise, support networks and programmes to build the capacity and capability in public and voluntary sector services to better accommodate the additional and broader needs.
  - **Skills, business and cultural development:** Alongside the demands and challenges are opportunities and potential. Many new arrivals come with a range of skills and qualifications that can be deployed in the NHS, schools, and the local economy. Deployment of these skills is not automatic though and is dependent on converting qualifications for use in the UK, navigation through the UK job market, as well as reaching relevant English language competencies. There is also a much higher business start-up rate amongst people from refugee and migrant communities, which could be harnessed to contribute to the local economy. Similarly, there is the diversity that new communities bring to arts, culture and food that can contribute to local centres and tourism.
- 2.2.6. This approach does not mean the Council must adopt a passive stance when the Government makes proposals which we feel are unacceptable. This has been the case on a number of occasions when the Council has pushed back regarding what were considered inappropriate proposals, and this should remain the case, particularly as long as the number of dispersed asylum seekers remain high.

2.3. Option 2. The Council does not engage in this policy area and responds only to mandatory schemes

- 2.3.1. There is an option that the Council does not engage in this policy area, responding only to mandatory schemes and situations as they arise. The Council could opt to reduce its commitment to taking newly resettled refugees or cease this altogether.
- 2.3.2. This option has been discounted. Not only is the scale and scope of the numbers, pressures and demands changing, but so is the role and independence of local authorities in the resettlement and immigration system. Refugee resettlement is one of the most important safe and legal routes for refugees from some of the worst conflict zones (in particular Afghanistan and Syria) and without access to this opportunity these families face a perilous existence in second countries.
- 2.3.3. The system is moving from one where local authorities could opt in to support asylum dispersal and government resettlement schemes/routes, to one where the government and individuals are increasingly mandating local authorities to participate.
- 2.3.4. Where local authorities retain some degree of independence, such as in pledges to Afghan resettlement schemes, they are also coming under increasing government pressure to participate and to maximise their pledges.
- 2.3.5. It is reasonable to assume that current conflicts in Ukraine and Syria, as well as the persecution of people in Afghanistan will both prevent the return of people to their homes and continue to increase the numbers of new arrivals for several years. Even if the situations in these countries improve it is likely to take some time for the current pressures to ease, in terms of gradual decline of people requiring resettlement, additional help and support or people being able to return to their homes. As a minimum the City Council needs to be prepared to provide information, advice, support and services to new communities throughout this period.
- 2.3.6. The UK is currently faced with a national housing crisis. The supply issue in Coventry is particularly acute regarding the availability of appropriate housing, for example providing larger homes (3 bedrooms or larger) to accommodate the composition of larger families within certain groups, for example Afghan refugees. Because of the diversity of Coventry's population and the history of inward migration Coventry is a popular destination for many refugee families and on occasion we see secondary migration into the city from other localities. Our participation in refugee resettlement maximises the opportunities to draw down external funding to support families in challenging situations.

**3. Refugee Resettlement**

- 3.1. Within the context of this report, an annual pledge of 125-150 people per annum from the Government's Resettlement Schemes (Afghan and UKRS) has been recommended. A pledge of 125 currently represents Coventry's share of the total government pledge to resettle 20,000 people via its Afghan schemes. Due to pressures of new arrivals the government has been contacting local authorities to ask them to increase their pledges so it can reduce the number of people in "bridging hotels". There are currently 9,677 who are requiring pledges of accommodation, many of whom have been in hotels for several months. Coventry's pledge will contribute to reducing the current and forecast pressures within Afghan resettlement, reflecting the city's diversity and experience in successful refugee resettlement.

#### **4. Results of consultation undertaken**

- 4.1. The Cabinet Member for Housing and Communities has been consulted on the development and presentation of this report, and a discussion was recently held with the One Coventry Leadership Team regarding the pressures of high numbers of arrivals.
- 4.2. The recommendations and options outlined in the report is a result of the Council's Migration Team experience and expertise in this area and in conjunction with key local voluntary and statutory organisations in the city. It has also taken into account from the perspectives those from refugee and newly arrived communities based on their lived experiences as part of extensive engagement process undertaken during the development of the One Coventry Together integration strategy.

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

- 5.1. Implementation of the recommendations will be imminent, and delivery will take place over the next 3-5 years. Progress will be reported annually to the relevant Cabinet Member (Housing and Communities) and to Cabinet.

#### **6. Comments from Chief Operating Officer (Section 151 Officer) and the Chief Legal Officer**

##### **6.1. Financial Implications**

Funding to support refugee resettlement is a complex mix of grants, split between those that are based on the number of people eligible for support and others that are based on grants received to deliver projects for the same client groups with more specific outputs. At the time the grants are established it is often unknown how long they will continue, and particularly for those awards based on the numbers of people, what level of grant will be ultimately received.

- a. Appendix 1 provides a breakdown of the grants currently received that are dependent upon eligible numbers alongside the grant values per individual. These grants are generally provided for the delivery of new and additional activity (rather than towards existing pressures), however can also be used to grow local capacity and capability to identify and respond to the specific needs and issues presenting from refugee and migrant communities. They can also be used to shape and grow a welcoming environment that is conducive to long-term integration and inclusion.
- b. In all these schemes, the Council is not required to bid, but to nominally accept the expected allocation of people and submit regular claims to reflect the numbers of people it is actually supporting.
- c. The funding currently contributes to the following areas:
  - Migration Team costs
  - Specific costs of other Council services directly involved providing support (Adult Education, Children's Services, EMAS, Housing)
  - Payments to schools that the children attend
  - Payments to other delivery partners (grant or contractual)
  - A general contribution to other costs incurred by the Council resulting from these schemes

- d. Whilst the above costs can be covered, there are risks surrounding some aspects of spend nationally that are not included within the grants, with local authorities continuing to highlight these issues with Government.
- e. These areas include:
  - I. Homelessness – particularly increased pressures from Ukrainian arrivals, where sponsorships breakdown or people can't be accommodated by their relatives. Whilst Coventry has had very small numbers of Ukrainian arrivals present as homeless, the final figure will depend on size of family and length of stay, etc. particularly after the end of 12-month placements.
  - II. Schools and education – unlike Homes for Ukraine and refugee resettlement schemes, for the Hong Kong British Nationals Overseas programme, where children arrive and require a school place, no extra funding is received in year to support these pressures for schools. Instead, costs will be reflected in school numbers at a later stage for funding.
- f. The report also seeks approval to accept further grant funding under the Asylum, Migration and Integration Fund (AMIF) to extend the MyCoventry project. The total cost of the extension is £883K. Grant is provided at 90% of the cost (£795K) with the remaining 10% being based on match funding. The project will be delivered by the Council and a range of delivery partners.
- g. The Council is the lead applicant, so all grant is received and paid across to partners by the Council. The Council's element of the project is £324K, and the Council will provide £32K match funding which will be funded from the Resettlement grants. The balance of the £88k match will be required to be delivered by partners and will be built into the relevant grant agreements with them.

## 6.2. Legal Implications

- a. Following an announcements and changes to legislation by Government in April 2022 all local authorities are now legally required to accommodate a share of supported asylum seekers, with the share of supported asylum seekers to be agreed between the local authorities in each government region. The consultation on the implementation of this new duty is ongoing and is part of the implementation of the new Nationality and Borders Act 2022.
- b. In relation to the AMIF additional funding, the Council will retain its role as the accountable body for this AMIF project. The Council will be issued with a grant agreement from the administrators containing terms and conditions. Those terms and conditions will be devolved to any partners within the overall project. These will ensure that appropriate conditions and obligations which are imposed upon the Council are passed on to the grant recipients (delivery partners) who receive the funding for delivering projects. The council has the power to act and accept this grant under Section 1 of the Localism Act 2011 (General Powers of Competence).

## 7. Other implications

- 7.1. How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))?

- 7.1.1. Inward migration into the City has been a significant factor in population growth in recent years and recommendations in this report will support the wider delivery of the Council's key objectives by supporting community cohesion and ensuring that refugees and newly arrived communities contribute to the City's economic prosperity and cultural diversity. By helping local people into jobs; reducing the impact of poverty; improving educational outcomes and improving the health and wellbeing of these communities.
- 7.1.2. At its highest level, this area of work makes a strong contribution to the One Coventry Council Plan, and **particularly the Council's aims of *improving outcomes and tackling inequalities within our communities*** which focuses on supporting our most vulnerable, including the integration of our refugee and migrant communities.
- a. The whole of this area of work the Council is engaged in aligns with the One Coventry Plan and its objectives.
- ***Increasing the economic prosperity of the city and region.*** With directed advice and support, people from refugee and migrant communities can bring their skills, qualifications and strengths to contribute to the local economy. Similarly, the diversity different communities bring to the arts, culture and food sectors can enhance and grow the offer provided by our city centre and local neighbourhood centres.
  - ***Improving outcomes and tackling inequalities within our communities.*** New arrivals face a range of barriers and disadvantages as they begin to rebuild and restart their lives in the UK. Failure to address these can reduce the life chances of first, second and potentially third generation arrivals. Whilst the response for co-ordination may be a responsibility for the Council, the success of resettlement and integration is dependent on the community response and welcome.
  - ***Tackle the Causes and Consequences of Climate Change.*** Climate change is already fuelling global migration. It is crucial that we can benefit from the knowledge of climate migrants to understand and tackle the causes of climate change and confront the challenges of human displacement and forced migration.
  - ***Continued financial sustainability of the Council.*** The support provided to people from refugee and migrant communities enables them to improve their standard of living. The programmes should help to support the financial sustainability of the Council by providing 100% income. A proportion of the funding would support the Council's core services.
  - ***Councils' role and partner, enabler and leader.*** Coventry City Council for the past several years has become a leader in refugee resettlement work, we will continue to promote the good practice to aid others to do well. This continued work would cement our reputation as a City of Sanctuary and City of Peace and Reconciliation. Partnership working is integral to the delivery of all elements of this work. As such, the Council will have a vital role to play in facilitating strong partnerships with other support organisations and acting as an important partner to regional and national organisations in delivering priority actions.

## 7.2. How is risk being managed?

- a. Managing these complex resettlement and migration projects with several partners does present some risk, but the Council has a good track record for maintaining and achieving significant financial controls, including well-established procedures for handling public

funds in order to ensure the best possible value is achieved for Government's investment in local programmes and the positive integration outcomes for newly arrived communities. Risks will be managed using the following approach:

- i. **Risk registers** are currently being progressed for all of the individual resettlement and migration strands.
  - ii. **Grant Aid Agreements** will be issued to partners which will pass on the risk of any funding claw back to partners in the event of non-compliance on their part.
  - iii. There are corporate risks concerning the Homes for Ukraine scheme that are concerned with safeguarding and protecting people from harm, as well as financial risks concerned with potential excess pressures from homelessness. We have put in place **stringent safeguarding and welfare checks** in line with Government guidance, this includes our own process of regular contact and touchpoints with clients. From a homelessness prevention standpoint the Council is working hard to sustain the local accommodation offers and extend them for as long as possible, whilst also developing a set of support offers to enable Ukrainian guests to transition to independent accommodation when their sponsor provided place comes to an end.
- b. In general, the main risks to the Council and Coventry are from inaction or a failure to take action, which matches the scale of the challenges and opportunities presented by the current landscape. These include short-term risks resulting from a lack of activity that is compliant with government grant funding conditions or at sufficient scale to match to citizen-initiated demands. The long-term risks are from failures of newly arrived communities to successfully settle and integrate into the city.

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

- 7.3.1. The recommended investment and programmes includes funding for the appropriate provision of both Council staff, and capacity in voluntary sector partners to manage these commitments. It should be noted that this will require specific and, in some cases, accelerated support from some wider Council services (e.g. Human Resources, ICT, Legal Services) for example as happened with the start-up of Homes for Ukraine at very short notice. There will still be additional possibilities for demands to be placed on Council services as a consequence of local or national decision e.g. Public Health, Welfare services, Adult Education. The Council, however, can be confident given its track record, and strong relationships with statutory partners that there is currently satisfactory funding available to meet Council commitments and an ability to secure external funding also where necessary.

### 7.4. **Equalities / EIA?**

- 7.4.1. This area of work aims to make a positive impact on people who are identified as more vulnerable in terms of economic wellbeing and gaining sustainable employment. Initiatives, projects and programmes will be tailored to meet those vulnerable groups. Data is regularly collected and analysed to ensure continuous improvement and effective identification of the most vulnerable groups and areas of the city.
- 7.4.2. No potential adverse impact has been identified for any specific group. However, Coventry could significantly and positively deliver equalities outcomes for a range of protected groups including young people; vulnerable people (economically disadvantaged); disabled people; people of black, Asian and minority ethnicity; women and older people.

- Linkages to our work with the WMSMP or the Coventry and Warwickshire Integrated Care System (ICS).
- There are indirect links across these areas. WMCA is responsible for the adult education budget in the West Midlands, which includes the funding of ESOL provision delivered by City College and Adult Education. There is therefore a need for WMCA to keep pace with the changing landscape and implications for the adult education budget – both from an ESOL and an employability perspective.
- Similarly, and as referenced in the report there is higher prevalence of business start-ups in refugee and migrant communities and the LEP potentially has a key role to facilitate that potential in places like Coventry.
- The diversity of new arrivals also presents new challenges to health and social care, but particularly health services. This is apparent when considering the contrast in how people engage with health services in their country of origin compared to the UK, vaccination rates, and the differences in prevalent health conditions. These create more unique health risks in these populations, challenges in promoting engagement with health services, as well as more general public health challenges.

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

- 7.5.1. The international picture is a difficult one to predict, but it has long been anticipated that the wide-ranging impact of climate change will lead to global conflict over natural resources and further international displacement.
- 7.5.2. The impacts of climate change are numerous and may both trigger further displacement and worsen living conditions or hamper return for those who have already been displaced. The intense support provided by the Migration Team will include discussions with individuals and organisations about the implications of climate change and how efforts to reduce carbon omissions is important.
- 7.5.3. The International Organisation of Migration (IOM) is estimating that by 2050 between 25 million to 1 billion people<sup>11</sup> could be moving either within their countries or across borders for climate-related reasons. Most of these journeys will lead to cities.
- 7.5.4. The successful integration of newly arrived communities will have a positive impact on climate change, thus supporting both the new Climate Change Strategy and One Coventry Plan 2022-2030's priority of 'Tackling the Causes and Consequences of Climate Change'. The Equitable and People-Centred Pathway adopted by the Council aims to build just, liveable, happy and inclusive urban communities, whilst addressing the systemic causes of poverty and inequality. As a result of this work, Coventry will be enhancing socially and culturally vibrant communities, whilst also supporting those that have been most disproportionately impacted by climate change. Ensuring a more inclusive urban community also leads to further opportunities related to climate change. For example, there is currently a green skills gap (e.g. retrofit) in the UK, which needs to be closed to ultimately enable us to reach net zero. By helping newly arrived communities and migrants into jobs, this both reduces poverty whilst also enabling people to use transferrable skills to close this gap and support the region to decarbonise.

## 7.6. **Implications for partner organisations?**

---

<sup>11</sup> [Publication IOM Outlook on Migration, Environment and Climate Change](https://publications.iom.int/system/files/pdf/mecc_outlook.pdf)  
[https://publications.iom.int/system/files/pdf/mecc\\_outlook.pdf](https://publications.iom.int/system/files/pdf/mecc_outlook.pdf)

7.6.1. The funding will have a positive implication for the voluntary sector/partners by bringing in additional resources, capacity and infrastructure into the city. Our support also aims at promoting community cohesion and enhancing the contribution residents are making towards the economy and more importantly the social fabric of the city.

**Report author(s):**

Name: Peter Barnett

Title: Head of Service Libraries and Migration

**Service:**

Public Health Insight and Migration

**Tel and email contact:**

Tel: 02476 972680

Email: [peter.barnett@coventry.gov.uk](mailto:peter.barnett@coventry.gov.uk)

Enquiries should be directed to the above person

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service Area</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Inderjit Kaur	Policy Development Manager (Migration)	Public Health Insight and Migration	15/09/2022	21/11/2022
Kathryn Sutherland	Lead Accountant	Finance	07/11/2022	18/11/2022
Lara Knight	Governance Services Officer	Law and Governance	18/11/2022	21/11/2022
Oluremi Aremu	Head of Legal and Procurement Services	Law and Governance	16/11/2022	18/11/2022
<b>Names of approvers for submission: (officers and members)</b>				
Julie Newman	Director of Law and Governance	Law and Governance	18/11/2022	28/11/2022
Ewan Dewar	Finance Manager	Finance	18/11/2022	21/11/2022
Allison Duggal	Director of Public Health and Wellbeing	-	18/11/2022	21/11/2022
Councillor D Welsh	Cabinet Member for Housing and Communities	-	18/11/2022	28/11/2022

This report is published on the council's website: [www.coventry.gov.uk/meetings](http://www.coventry.gov.uk/meetings)

This page is intentionally left blank

## Appendix 1: Resettlement & Asylum Seeker Funding

Programme	Standard Tariff (per person)	Early Years Education (per 3-4 year old)	Education Funding (per child 5+)	ESOL Funding (per adult)	Other Notes
Afghan Citizen Resettlement	£20,520	£2,250	£4,500	£850	Standard Tariff funding spread across 3 years (£10,500 in Year 1 reducing to £4020 in Year 3) Education & ESOL in Year 1 only Additional claims possible for SEN etc
UK Resettlement	£20,520	£2,250	£4,500	£850	Standard Tariff funding spread across 5 years (£8,520 in Year 1 reducing to £1,000 in Year 5) Education & ESOL in Year 1 only Additional claims possible for SEN etc.
Hong Kong British National Overseas (BNO)	-	-	-	£800	£2,720 per household available for destitution support
Homes for Ukraine	£10,500	£3,000	£6,580 / £8,755	-	Tariffs currently Year 1 only. Standard Tariff includes £200 one-off 'Welcome payment'. Early Years 2-4 (£3,000); Lower Education payment from 5-10 (£6,580); Higher 11-18 (£8,755). In addition, there is funding for the £350 per month 'Sponsor payment'.
Asylum Dispersal (Grant 1)	£250	-	-	-	£250 per asylum seeker in Home Office supported asylum seeker accommodation on 27 March 2022. One-Off grant payment
Asylum Dispersal (Grant 2)	-	-	-	-	£3,500 per new bed space occupied.



By virtue of paragraph(s) 1, 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank