

**Time and Date**

2.00 pm on Tuesday, 21st March, 2023

**Place**

Council Chamber - Council House

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**1. Apologies****2. Minutes of the meeting held on 21 February 2023 (Pages 7 - 22)****3. Exclusion of the Press and Public**

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

**4. Coventry Good Citizen Award**

To be presented by the Lord Mayor

**5. Correspondence and Announcements of the Lord Mayor****6. Petitions****7. Declarations of Interest****Matters Left for Determination by the City Council/Recommendations for the City Council****8. Electric Vehicle Charging Infrastructure Procurement (Pages 23 - 34)**

From the Cabinet held on 14 February 2023

**9. Coventry UK Shared Prosperity Fund 2023-2025 (Pages 35 - 48)**

From the Cabinet held on 14 February 2023

**It is anticipated that the following matters will be referred as Recommendations from the meetings indicated. Where appropriate, the reports are attached. The relevant Recommendations will be circulated separately.**

**10. Appointment of Chief Executive**

From the Appointments Panel held on 13 March, 2023

11. **Household Support Fund Grant Acceptance** (Pages 49 - 54)  
From the Cabinet held on 14 March 2023
12. **Homes in Multiple Occupation Development Plan Document Proposed Submission (Regulation 19) Consultation** (Pages 55 - 312)  
From the Cabinet held on 14 March 2023
13. **One Coventry Plan 2022-2030** (Pages 313 - 386)  
From the Cabinet held on 14 March 2023
14. **City Centre Cultural Gateway Project** (Pages 387 - 404)  
From the Cabinet held on 14 March 2023
15. **Proposed Changes to the Constitution** (Pages 405 - 416)  
From the Cabinet Member for Policing and Equalities held on 16 March 2023

#### **Items for Consideration**

16. **Electoral Review: Council Size and Forecasting Submissions - Local Government Boundary Review** (Pages 417 - 450)  
Report of the Chief Legal Officer
17. **Annual Pay Policy Statement 2023/24** (Pages 451 - 464)  
Report of the Chief People Officer

#### **Other items**

18. **Question Time** (Pages 465 - 468)
  - (a) Written Question – Booklet 1
  - (b) Oral Questions to Chairs of Scrutiny Boards/Chair of Scrutiny Co-ordination Committee
  - (c) Oral Questions to Chairs of other meetings
  - (d) Oral Questions to Representatives on Outside Bodies
  - (e) Oral Questions to Cabinet Members and Deputy Cabinet Members on any matter
19. **Statements (if any)**
20. **Debates**
  - 20.1 To be moved by Councillor B Gittins and seconded by Councillor R Auluck

“This Council supports Unite the Union’s Get Me Home Safely campaign, which calls on employers to take all reasonable steps to ensure workers are able to get home safely from work at night, which is greatly needed. The Council will ensure, wherever possible, it puts into actions the following ambitions of the campaign and will call on key partners to do the same:-

- While employers may feel their duty of care to staff ends when an employee finishes a shift, they also need to take into consideration journeys home, especially during unsocial hours;
- The weakness of enforcement of the law against sexual assault, including up-skirting, on public transport is appalling and only 2% of victims go on to report sexual harassment on public transport;
- Greater numbers of trained staff and stronger enforcement of the law against sexual assault and harassment on public transport are urgently needed;
- Our bus workers provide an essential service for many people in our community but many are not being provided with decent toilets during work, which is humiliating for these workers and impacts their health. Lack of toilet facilities is largely due to cuts to funding for public toilets and this must be reversed.
- It is important to use powers - as other councils have done – and adopt a policy that our Licensing and Regulatory Committee will ensure the process for approving late night licenses is linked to the provision of free transport home for night shift employees. This will significantly benefit the safety and wellbeing of hospitality workers, particularly women, who often cannot afford, or access, safe transport options late at night and benefit our community.
- Publicly call for improvement to late night and off-peak transport service provision, and use the Government’s **Safety of Women at Night** Fund to provide extra night services, as well as work with employers to use the fund for supplementary taxi travel.
- Publicly call for the lowering of fares and opposition to any cuts to public transport funding and for this Council and the WM Mayor and representatives in UK Parliament to use their powers and political platforms to achieve this.

- Publicly call for the municipal ownership of buses in order to lower prices and improve service provision, especially for night-time and off-peak services;
- Make representation to appropriate regional and national levels of governance to bring forward national minimum standards for taxis and private hire as per the recommendations of the [Task and Finishing group](#) and in support of this motion and its demands on behalf of our local community’.

20.2 To be moved by Councillor T Sawdon and seconded by Councillor R Bailey

“This Council calls on the Government to commission a public inquiry into the collapse of the City of Coventry Culture Trust.”

### **Private Business**

**It is anticipated that the following matter will be referred as Recommendations from the Cabinet held on 14 March. The report is attached. The relevant Recommendations will be circulated separately.**

21. **City Centre Cultural Gateway Project** (Pages 469 - 488)

(Listing Officer: C Booth, email: [charlotte.booth@coventry.gov.uk](mailto:charlotte.booth@coventry.gov.uk))

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Julie Newman, Chief Legal Officer, Council House, Coventry

Monday, 13 March 2023

Note: The person to contact about the agenda and documents for this meeting is Usha Patel/Suzanne Bennett 024 7697 2301 / 2299

Membership: Councillors F Abbott, S Agboola, N Akhtar, P Akhtar, M Ali, R Auluck, R Bailey, L Bigham, J Birdi (Deputy Chair), J Blundell, R Brown, K Caan, J Clifford, G Duggins, J Gardiner, B Gittins, S Gray, L Harvard, G Hayre, M Heaven, P Hetherington, A Hopkins, J Innes, T Jandu, A Jobbar, S Keough, T Khan, AS Khan, R Lakha, R Lancaster, M Lapsa, J Lepoidevin, G Lloyd, P Male, A Masih, K Maton (Chair), J McNicholas, C Miks, B Mosterman, M Mutton, S Nazir, J O'Boyle, G Ridley, E Ruane, K Sandhu, T Sawdon, P Seaman, R Simpson, B Singh, R Singh, R Thay, CE Thomas, A Tucker and D Welsh

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However, by entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes. If you have any queries regarding this, please contact the Governance Services Officer at the meeting.

**Usha Patel/Suzanne Bennett**  
**024 7697 2301 / 2299**

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## Coventry City Council

### Minutes of the Meeting of Council held at 2.00 pm on Tuesday, 21 February 2023

Present:

Members: Councillor K Maton (Chair)

Councillor S Agboola	Councillor R Lakha
Councillor N Akhtar	Councillor R Lancaster
Councillor P Akhtar	Councillor M Lapsa
Councillor R Auluck	Councillor J Lepoidevin
Councillor R Bailey	Councillor G Lloyd
Councillor L Bigham	Councillor P Male
Councillor J Birdi	Councillor A Masih
Councillor J Blundell	Councillor J McNicholas
Councillor R Brown	Councillor M Mutton
Councillor K Caan	Councillor S Nazir
Councillor J Clifford	Councillor J O'Boyle
Councillor G Duggins	Councillor G Ridley
Councillor J Gardiner	Councillor T Sawdon
Councillor B Gittins	Councillor P Seaman
Councillor S Gray	Councillor R Simpson
Councillor L Harvard	Councillor B Singh
Councillor G Hayre	Councillor R Singh
Councillor P Hetherton	Councillor R Thay
Councillor A Hopkins	Councillor CE Thomas
Councillor J Innes	Councillor A Tucker
Councillor T Jandu	Councillor D Welsh
Councillor A Jobbar	
Councillor S Keough	
Councillor T Khan	

Honorary Alderman: T Skipper

Apologies: Councillors F Abbott, M Ali, M Heaven, AS Khan, B Mosterman, E Ruane and K Sandhu  
Honorary Aldermen H Fitzpatrick, M Hammon, D Skinner

### **Public Business**

#### **105. Minutes of the Meeting held on 17 January 2023**

The minutes of the Meeting held on 17 January 2022 were signed as a true record.

#### **106. Correspondence and Announcements of the Lord Mayor**

a) Death of Council Employee

The Lord Mayor referred to the recent sad death of a Senior Crew Member in Waste Services. A joint letter of condolence has been sent by the Lord Mayor, the Leader of the Council, and the Cabinet Member for City Services to the family to express sincere condolences on behalf of the City Council.

b) Death of Dick Ryder

The Lord Mayor referred to the recent sad death of Dick Ryder who was Assistant Director Procurement at the City. Dick's wife Judy also worked for Coventry City Council. The Lord Mayor had written a letter of condolence to Judy on behalf of the City Council.

c) Death of Eileen Sheriden

The Lord Mayor referred to the recent sad death of Eileen Sheriden, known as the "Mighty Atom. Arguably Coventry's most famous cyclist and a true Coventrian, Eileen was born in Cheylesmore and blazed a trail for other female cyclists to follow. She embarked on a series of endurance races and broke a number of records but is perhaps best remembered for cycling from Land's End to John O'Groats in less than 3 days in 1954. She then got back on the saddle to complete another 300 miles to ensure she set a new 1,000-mile record too. She was once named as "Britain's Greatest Cyclist" by Cycling Weekly, transforming perceptions of women cyclists at a time when there were no cycling races for women in the Olympics.

d) Earthquake in Turkey and Syria

The Lord Mayor referred to the devastating loss of life in Turkey and Syria following the catastrophic earthquake earlier this month. Thoughts were with all of those who had lost loved ones and who continued to face trauma and hardship following this tragic event.

The Lord Mayor invited all present to join him in a Minute's silence as a mark of respect for all those mentioned above.

e) Recent Trip to Dresden

Following an invitation from the Mayor of Dresden, Dirk Hilbert, the Lord Mayor reported that he and the Lady Mayoress visited the City for the commemoration of the 78th anniversary of the destruction of Dresden.

107. **Petitions**

**RESOLVED that the following petitions be referred to the appropriate City Council body:**

- **Request to create a litter strategy to reduce the amount of litter and fly tipping across Coventry – 495 signatures, presented by Councillor S Gray**



- **Request to install additional street lighting at three locations across Woodlands Ward: the park area on the Bannerbrook Park estate, the Brookstray are around the subway in Mount Nod and the top of Park Hill Lane in Park Hill – 92 signatures, presented by Councillor P Male**
- **Request to cut back tress on the approach to the junction and crossing and make safe the junction at Hen Lan and Briscoe Road – 200 signatures, presented by Councillor R Lancaster**

108. **Declarations of Interest**

There were no declarations of interest.

109. **Motion without Notice**

In accordance with the Constitution, a Motion without Notice was moved by Councillor M Mutton, seconded by Councillor G Lloyd and adopted that agenda items 6 (Council Tax Setting Report 2023/24), 7 (Budget Report 2023/24) and 8 (Medium Term Financial Strategy 2023-26) be considered together.

It was noted that a recorded vote would be taken in respect of all decisions relating to matters the subject of Minutes 110 (Council Tax Setting Report 2023/24) and 111 (Budget Report 2023/24) below, including any amendments.

110. **Council Tax Setting Report 2023/24**

Further to Minute 96 of the Cabinet, the City Council considered a report of the Interim Chief Executive (Section 151 Officer) which calculated the Council Tax level for 2023/23 and made appropriate recommendations to Council, consistent with the Budget Report 2023/24.

The report calculated the Council Tax level for 2023/24 and made appropriate recommendations to Council, consistent with the Budget Report 2023/24 on the same agenda. The report recommended a 4.9% increase in the City's Council Tax. Some figures and information detailed within the report were necessarily provisional due to precepts from the Police and Crime Commissioner and the Fire and Rescue Authority having not been confirmed at the time of publication. These figures were shaded in grey within the report and were confirmed as final figures at the meeting.

The report incorporated the impact of the Council's gross expenditure and the level of income it would receive through Business Rates, grants, and fees and charges. This resulted in a Council Tax requirement, as the amount that its expenditure exceeded all other sources of income.

The report included a calculation of the Band D Council Tax that would be needed to generate this Council Tax requirement, based on the City's approved Council Tax base. The 2023/24 Band D Council Tax that was calculated through this process had increased by £89.99 from the 2022/23 level.

Each year the Government determined the maximum Council Tax increases that local authorities could set without triggering a referendum. For 2023/24 the Secretary of State had published a report which proposed that the rise in Coventry

City Council's Council Tax must be below 5% in 2023/24 to avoid triggering a referendum, comprising a 2% precept for expenditure on adult social care and a maximum of 3% for other expenditure. At the time of writing the Secretary of State's report was subject to parliamentary approval. The recommendations within the Budget Report 2023/24 were based on a proposed increase in Council Tax of 4.9%, incorporating a core Council Tax rise of 2.9% and a 2% Adult Social Care Precept.

Recommendations followed the structure of resolutions drawn up by the Chartered Institute of Public Finance and Accountancy, to ensure that legal requirements were fully adhered to in setting the tax. As a consequence, the wording of the proposed resolutions was necessarily complex.

As it was his final meeting before leaving the authority, the Leader and the Cabinet Member for Finance and Resources thanked Paul Jennings, Finance Manager, for the work he had undertaken in relation to budget setting proposals over a number of years.

**RESOLVED that the City Council:**

1. **Notes the following Council Tax base amounts for the year 2023/24, as approved by Cabinet on 10 January 2023, in accordance with Regulations made under Section 31B of the Local Government Finance Act 1992 ("the Act"):**

- a) **86,075.2 being the amount calculated by the Council as its Council Tax base for the year for the whole Council area:**
- b) **Allesley 387.5  
Finham 1,549.4  
Keresley 369.8**

**being the amounts calculated by the Council as its Council Tax base for the year for dwellings in those parts of its area to which one or more special items relate.**

2. **That the following amounts be now calculated by the Council for the year 2023/24 in accordance with Sections 31A, 31B and 34 to 36 of the Act:**

- (a) **£812,016,800 being the aggregate of the amounts that the Council estimates for the items set out in Section 31A(2) of the Act taking into account all precepts issued to it by Parish Councils (*Gross Expenditure and reserves required to be raised for estimated future expenditure*);**
- (b) **£647,576,998 being the aggregate of the amounts that the Council estimates for the items set out in Section 31A(3) of the Act. (*Gross Income including reserves to be used to meet the Gross Expenditure but excluding Council Tax income*);**
- (c) **£164,439,802 being the amount by which the aggregate at (2)(a)**

above exceeds the aggregate at (2)(b) above, calculated by the Council in accordance with Section 31A(4) of the Act, as its Council Tax requirement for the year;

(d) £1,910.42

$$\frac{(2)(c)}{(1)(a)} = \frac{\underline{\underline{£164,439,802}}}{86,075.2}$$

being the amount at (2)(c) above divided by the amount at (1)(a) above, calculated by the Council in accordance with Section 31B of the Act, as the basic amount of its Council Tax for the year. *(Average Council Tax at Band D for the City including Parish Precepts).*

(e) £47,360

being the aggregate amount of all special items referred to in Section 34(1) of the Act. *(Parish Precepts);*

$$(f) \quad \pounds 1,909.87 \quad = (2)(d) - \frac{(2)(e)}{(1)(a)} = \pounds 1,909.87 - \frac{\pounds 47,360}{86,075.2}$$

being the amount at (2)(d) above, less the result given by dividing the amount at (2)(e) above by the amounts at (1)(a) above, calculated by the Council, in accordance with Section 34(2) of the Act, as the basic amount of its Council Tax for the year for dwellings in those parts of the area to which no special item relates. (*Council Tax at Band D for the City excluding Parish Precepts*);

(g)

<b>Coventry (Unparished area)</b>	<b>£1,909.87</b>
<b>Allesley</b>	<b>£1,949.65</b>
<b>Finham</b>	<b>£1,923.63</b>
<b>Keresley</b>	<b>£1,938.59</b>

being the amounts given by adding to the amount at (2)(f) above, the amounts of the special item or items relating to dwellings in those parts of the Council's area mentioned above divided in each case by the amount at (1)(b) above, calculated by the Council, in accordance with Section 34(3) of the Act, as the basic amounts of its Council Tax for the year for dwellings in those parts of its area to which one or more special items relate. (*Council Taxes at Band D for the City and Parish*).

h)

<b>Valuation Band</b>	<b>Parts to which no special item relates</b>	<b>Parish of Allesley</b>	<b>Parish of Finham</b>	<b>Parish of Keresley</b>
	<b>£</b>	<b>£</b>	<b>£</b>	<b>£</b>
<b>A</b>	<b>1,273.25</b>	<b>1,299.77</b>	<b>1,282.42</b>	<b>1,292.40</b>
<b>B</b>	<b>1,485.45</b>	<b>1,516.39</b>	<b>1,496.15</b>	<b>1,507.79</b>
<b>C</b>	<b>1,697.66</b>	<b>1,733.02</b>	<b>1,709.89</b>	<b>1,723.19</b>
<b>D</b>	<b>1,909.87</b>	<b>1,949.65</b>	<b>1,923.63</b>	<b>1,938.59</b>
<b>E</b>	<b>2,334.29</b>	<b>2,382.91</b>	<b>2,351.11</b>	<b>2,369.39</b>
<b>F</b>	<b>2,758.70</b>	<b>2,816.16</b>	<b>2,778.58</b>	<b>2,800.18</b>
<b>G</b>	<b>3,183.12</b>	<b>3,249.42</b>	<b>3,206.05</b>	<b>3,230.99</b>
<b>H</b>	<b>3,819.74</b>	<b>3,899.30</b>	<b>3,847.26</b>	<b>3,877.18</b>

being the amounts given by multiplying the amounts at (2)(g) above by the number which, in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that

proportion is applicable to dwellings listed in valuation Band D, calculated by the Council, in accordance with Section 36(1) of the Act, as the amounts to be taken into account for the year in respect of categories of dwelling listed in different valuation bands.

3. Notes that for the year 2023/24 the Police and Crime Commissioner for the West Midlands and West Midlands Fire Authority have stated the following amounts in precepts issued to the Council, in accordance with Section 40 of the Act, for each of the categories of dwelling shown below:

Valuation Band	Police and Crime Commissioner for the West Midlands	West Midlands Fire Authority
	£	£
A	135.03	48.68
B	157.54	56.79
C	180.04	64.90
D	202.55	73.02
E	247.56	89.24
F	292.57	105.47
G	337.58	121.69
H	405.10	146.03

4. That having calculated the aggregate in each case of the amounts at (2)(h) and (3) above, the Council, in accordance with Sections 30 and 36 of the Act, hereby sets the following amounts as the amounts of Council Tax for the year 2023/24 for each part of its area and for each of the categories of dwellings shown below:

Valuation Band	Parts to which no special item relates	Parish of Allesley	Parish of Finham	Parish of Keresley
	£	£	£	£
A	1,456.96	1,483.48	1,466.13	1,476.11
B	1,699.78	1,730.72	1,710.48	1,722.12
C	1,942.60	1,977.96	1,954.83	1,968.13
D	2,185.44	2,225.22	2,199.20	2,214.16
E	2,671.09	2,719.71	2,687.91	2,706.19
F	3,156.74	3,214.20	3,176.62	3,198.22
G	3,642.39	3,708.69	3,665.32	3,690.26
H	4,370.87	4,450.43	4,398.39	4,428.31

5. That the Council determines that its relevant basic amount of Council Tax for 2023/24 is not excessive in accordance with the principles set out in the Secretary of State's report, under Sections 52ZC and 52ZD of the Act.

The Councillors voting For and Against the Recommendations were as follows:

<u>For</u>		<u>Against</u>	<u>Abstain</u>
Councillors:	Councillors:	Councillors:	
S Agboola	T Khan	R Bailey	
N Akhtar	R Lakha	J Birdi	
P Akhtar	R Lancaster	J Blundell	
R Auluck	G Lloyd	J Gardiner	
L Bigham	J McNicholas	T Jandu	
R Brown	M Mutton	S Keough	
K Caan	S Nazir	M Lapsa	
J Clifford	J O'Boyle	J Lepoidevin	
G Duggins	P Seaman	P Male	
B Gittins	B Singh	A Masih	
S Gray	R Singh	G Ridley	
L Harvard	R Thay	T Sawdon	
G Hayre	CE Thomas	R Simpson	
P Hetherton	A Tucker		
A Hopkins	D Welsh		
J Innes	Lord Mayor		
A Jobbar			
	<b>Total: 33</b>	<b>Total: 13</b>	<b>Total: 0</b>

Result: Carried

For: 33

Against: 13

Abstain: 0

#### 111. **Budget Report 2023/24**

Further to Minute 97 of the Cabinet, the City Council considered a report of the Interim Chief Executive (Section 151 Officer) which set out the proposals for the Council's final revenue and capital budget for 2023/24.

The report followed on from the Pre-Budget Report approved by Cabinet on 13th December 2022 (minute 64/22 referred), which had since been subject to a period of public consultation. The proposals within the report now formed the basis of the Council's final revenue and capital budget for 2023/24 incorporating the following details:

- Gross budgeted spend of £812m (£63m or 8% higher than 2022/23).
- Net budgeted spend of £261m (£23m or 10% higher than 2022/23) funded from Council Tax and Business Rates less a tariff payment of £20.5m due to Government.
- A Council Tax Requirement of £164.4m (£11.0m or 7% higher than 2022/23), reflecting a City Council Tax increase of 4.9% detailed in the separate Council Tax Setting report on today's agenda.
- A number of new expenditure pressures, policy priority proposals and technical savings proposals.
- A Capital Strategy including a Capital Programme of £159.2m including expenditure funded by Prudential Borrowing of £19.6m.
- An updated Treasury Management Strategy, Capital Strategy and a Commercial Investments Strategy.

The financial position in this Budget Report was based on the Final 2023/24 Local Government Finance Settlement. The Settlement included some variations to the core position and specific grant allocations received in 2022/23 which provided some additional resources to help the Council manage the pressures it faced, in particular in relation to social care and the wider costs of inflation. The position after 2023/24 remained uncertain despite the Government's medium-term spending plans being set out in the Autumn Statement published in November 2022. Reviews in relation to the local government financial allocation model and Business Rates retention were not now expected within the current parliament and would therefore not be in place for 2024/25 Budget Setting. The overall local government settlement for 2024/25 was expected to broadly mirror the 2024/25 position but had not been set out at an individual authority level. As a result, it was impossible to provide a robust medium term financial forecast at this stage and the Council had instead made some planning estimates for future years. Initial assumptions indicated the likelihood that there would be a substantial gap for the period following 2023/24. The view of the Interim Chief Executive (Section 151 Officer) was that the Council should be planning for such a position.

The Pre-Budget Report was based on an increase in Council Tax of 4.9% and this position had been maintained for the final proposals in this report. This incorporated an increase of 2.9%, which was within the Government's limit of 3% above which a referendum would need to be held plus a further 2% Adult Social Care (ASC) Precept line with Government expectations. The Precept was trailed in the Autumn Statement 2022 and included in the Local Government Settlement as the means for councils to maintain their "core spending power". The precept was essential to enable councils including Coventry to manage increases in the costs of care. In total, the rise in Council Tax bills would be the equivalent of around £1.60 a week for a typical Coventry household including the expected rises in the precepts for Police and Fire.

The Local Government Finance Settlement had helped the Council to close the significant financial gap which it had at the start of the Budget process. Further measures include the identification of additional Council Tax resources and a range of technical adjustments and newly identified cost savings or income streams. All these proposals were set out in detail in Appendix 1 to the report. Where these were different to the proposals that were included in the Pre-Budget Report, this had been indicated within the Appendix and shown in tables 2 and 3 of the report. There were no new service savings required as a result of this budget.

The proposals did not provide the Council with a balanced budget beyond 2023/24. The Council's current medium-term bottom line incorporated a combination of future inflationary and service pressures and the fall-out of uncertain specific grant resources. Some of the future funding assumptions were speculative at this stage and would be revised towards the end of 2023 as any changes to local government finance resulting from the 2024/25 Settlement were made known. The initial approach would however be dictated by an intention to review and update technical information as it became available to the Council and to identify further efficiencies from, or generate further income within, Council services. The Council was seeking currently to update its policy priorities and these would be included as part of the 'One Coventry Plan' which would be approved later this year. Through 2023 it would also refine and implement a

programme of activity designed to review how best to deliver its services, improve integration between some of them and optimise the effectiveness of others.

Whatever the future held for national changes to local government finance the Council remained committed to strengthening its own financial self-sustainability and the need to support the vibrancy and growth of the city. Over the coming year the Council would continue to invest in and pursue activities that strengthened its existing financial interests and those of the city although this would be done within the restrictions imposed by Government in relation to access to borrowing from the Public Works Loans Board. The Council's view was that a positive and ambitious strategy was preferable to a more passive approach which would leave the Council more vulnerable to central government and the wider pressures on local government services. The Council's existing financial resilience and its belief in the city's long-term economic strength mean that this continued to be an ideal time to commit to Coventry's reset and recovery.

The recommended Capital Programme proposals were a key part of the Council's approach and amounted to £159.2m in 2023/24. The proposals reflected the Council's ambitions for the city and included: extensive highways infrastructure works including specific schemes relating to air quality, commencement of the City Region Sustainable Transport Settlement (CRSTS) programme that included initial packages of the Foleshill and London Road corridor; moving towards the next phase of the Very Light Rail project; the Council's share of capital loan financing to finalise the construction phase of the city's new Materials Recycling Facility; progressing the City Centre South redevelopment; and the completion of the second office building within the Friargate district of the city. Over the next 5 years the Capital Programme was estimated would total £544m as part of on-going investment delivered by and through the City Council.

The annual Treasury Management Strategy, incorporating the Minimum Revenue Provision policy, and also the Commercial Investment Strategy were set out. These cover the management of the Council's treasury and wider commercial investments, cash balances and borrowing requirements. These strategies and other relevant sections of this report reflected the requirements of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Treasury Management Code and Prudential Code for Capital Finance, as well as statutory guidance on Minimum Revenue Provision (MRP) and Investments.

An amendment, as detailed in Appendix 1 to these Minutes, was moved by Councillor Sawdon, seconded by Councillor Ridley and lost.

**RESOLVED that the City Council:**

- 1. Approve the Budget proposals in Appendix 1 to the report.**
- 2. Approve the total 2023/24 revenue budget of £812m in Table 1 and Appendix 3 of the report, established in line with a 4.9% City Council Tax increase and the Council Tax Requirement recommended in the Council Tax Setting Report considered on today's agenda.**



3. Note the Interim Chief Executive's (Section 151 Officer) comments confirming the adequacy of reserves and robustness of the budget in Section 5.1.2 and 5.1.3 of the report.
4. Approve the Capital Strategy incorporating the Capital Programme of £159.2m for 2023/24 and the forward commitments arising from this programme totalling £544m between 2023/24 to 2027/28 detailed in Section 2.3 and Appendix 4 of the report.
5. Approve the Council's Treasury Management Strategy and Minimum Revenue Provision Statement for 2023/24 in Section 2.4 of the report and the Prudential Indicators and limits described and detailed in Appendix 6a to the report, the Commercial Investment Strategy for 2023/24 in Section 2.5 and Appendix 5 of the report and the Commercial Investment Indicators detailed in Appendix 6b to the report.

The Councillors voting for and against **the amendment** as detailed in Appendix 1 to these Minutes were as follows:

<b><u>For</u></b>	<b><u>Against</u></b>	<b><u>Abstain</u></b>
Councillors:	Councillors:	Councillors:
R Bailey	S Agboola	T Khan
J Birdi	N Akhtar	R Lakha
J Blundell	P Akhtar	R Lancaster
J Gardiner	R Auluck	G Lloyd
T Jandu	L Bigham	J McNicholas
S Keough	R Brown	M Mutton
M Lapsa	K Caan	S Nazir
J Lepoidevin	J Clifford	J O'Boyle
P Male	G Duggins	P Seaman
A Masih	B Gittins	B Singh
G Ridley	S Gray	R Singh
T Sawdon	L Harvard	R Thay
R Simpson	G Hayre	CE Thomas
	P Hetherton	A Tucker
	A Hopkins	D Welsh
	J Innes	Lord Mayor
	A Jobbar	
<b>Total: 13</b>		<b>Total: 33</b>
		<b>Total: 0</b>

Result: Lost

For: 13

Against: 33

Abstain: 0

The Councillors voting for and against the **Recommendations** were as follows:

<b><u>For</u></b>	<b><u>Against</u></b>	<b><u>Abstain</u></b>
Councillors:	Councillors:	Councillors:

S Agboola	T Khan	R Bailey
N Akhtar	R Lakha	J Birdi
P Akhtar	R Lancaster	J Blundell
R Auluck	G Lloyd	J Gardiner
L Bigham	J McNicholas	T Jandu
R Brown	M Mutton	S Keough
K Caan	S Nazir	M Lapsa
J Clifford	J O'Boyle	J Lepoidevin
G Duggins	P Seaman	P Male
B Gittins	B Singh	A Masih
S Gray	R Singh	G Ridley
L Harvard	R Thay	T Sawdon
G Hayre	CE Thomas	R Simpson
P Hetherton	A Tucker	
A Hopkins	D Welsh	
J Innes	Lord Mayor	
A Jobbar		
	<b>Total: 33</b>	<b>Total: 13</b>
		<b>Total: 0</b>

Result: Carried

For: 33

Against: 13

Abstain: 0

## 112. **Medium Term Financial Strategy 2023-26**

Further to Minute 89 of the Cabinet, the City Council considered a report of the Interim Chief Executive (Section 151 Officer) that presented a Medium-Term Financial Strategy (MTFS) for adoption by the City Council. The previous strategy was approved in January 2022 (min 52/21 referred). The Strategy, which was included in full as a separate Appendix to the report, set out the financial and policy context for the Council's medium-term financial plans.

The report had been considered by the Scrutiny Co-ordination Committee at their meeting on 8<sup>th</sup> February 2023 (their minute 38/22 referred) and a Briefing Note setting out a recommendation from the Committee that indicated that the Committee supported the Medium-Term Financial Strategy 2023-2026 and recommended that the Cabinet recommended to Council the approval of the Strategy as the basis of its medium-term financial planning process, was circulated. The report would also be considered at the meeting of Council on 21<sup>st</sup> February 2023.

Cabinet considered separately the detailed proposals for 2023/24 within the Pre-Budget Report in December 2022 (minute 64/22 referred) which included the best estimate of the Council's three-year settlement financial position available at that time. The final Budget Setting Report would be brought to Cabinet and Council in February 2023.

The national funding background had been set out in the Autumn Statement published by the Government in November 2022 with further detail included in the 2023/24 Provisional Local Government Finance Settlement on 19th December 2022. This confirmed the position that there would be no structural changes to the funding arrangements in the coming financial year.

The Council's existing financial position had been characterised by several fundamental financial challenges including a long period which saw the real value of Government financial settlements reduce, an increase in the demand for services such as social care and the emergence of inflationary pressure on a wide range of costs. In response the Council had been able to balance its budget through the receipt of significant time-limited Government grant allocations and approval of maximum permitted Council Tax rises. The Council still faced significant budget gaps in the medium-term and one of the purposes of the MTFs was to set out the Council's approach to managing this position. Notwithstanding, the Council would need to maintain dynamic financial models that took account of changes in its medium-term budget position and ongoing re-evaluation of its Capital Programme. These would be set out fully at the point of decision making.

The Strategy had at its heart the need to deliver the priorities set out in the One Coventry Council Plan with a paramount need to protect the most vulnerable people in the city and deliver expectations on the Council to maintain service levels and standards across a wide range of core services.

Taken together, these factors represented a combination of limited resources, challenging underlying economic and demographic conditions, increased demand, pressure to sustain the quality of services and new challenges represented by government reform and local structural and governance relationships. In these circumstances it was crucial that the Council's financial strategy was both robust and flexible. This would provide the financial foundations required to ensure that Council services were fit for purpose to protect the most vulnerable as well as providing good quality core services for every citizen in the city in line with the Council's aspiration to deliver its One Coventry Plan.

**RESOLVED that the City Council approve the Strategy as the basis of its medium-term financial planning process.**

113. **Statement**

Councillor P Seaman, Cabinet Member for Children's Services made a Statement in respect of the Youth Justice Service.

Councillor J Lepoidevin responded to the Statement.

114. **Debate**

The following Motion was moved by Councillor P Male and seconded by Councillor R Simpson:

"This Council expresses its deep concern over the legacy of the City of Culture"

The following amendment was moved by Councillor D Welsh, seconded by Councillor R Brown and carried:

After the words “expresses its”, delete the words “deep concerns over” and replace with “support on the work to deliver”

The amended Motion to now read:

“This Council expresses its support on the work to deliver the legacy of the City of Culture”

**RESOLVED that the amended Motion as set out above, be adopted.**

(Meeting closed at 6.12 pm)

## APPENDIX

### Conservative Group Budget proposals, Council meeting on 21<sup>st</sup> February 2023

#### AMENDMENT

##### Budget Report 2023/24 - Amendment

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	£000
<hr/>	
<u>New Spending Proposals</u>	
Highways Resurfacing & Potholes	275,000
Road Safety Schemes	275,000
Reduce Council Tax requirement by 1%	1,567,000
Additional resources to tackle graffiti	42,000
<hr/>	
	2,159,000
<hr/>	
<u>Additional Savings</u>	
Trades Union Facilities Time	(341,000)
Removal of Citivision	(35,000)
Removal of Deputy Cabinet Members & Cabinet Reduced to 8 Members	(45,000)
Delete Two posts from Corporate Communications team (One Grade 8, One Grade 5)	(96,000)
Remove Policy Contingency	(75,000)
Use Government Covid resources to reduce Council Tax requirement	(1, 567,000)
<hr/>	
	(2,159,000)
<hr/>	

Proposed by: Cllr Tim Sawdon

Seconded by: Cllr Gary Ridley

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**Council – 21<sup>st</sup> March 2023**  
**Recommendation from Cabinet**  
**14<sup>th</sup> February 2023**

**Coventry City Council**  
**Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 14th February 2023**

Present:

Members:

Councillor G Duggins (Chair)  
Councillor AS 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 G Hayre  
Councillor G Lloyd

Non-Voting Opposition  
Members:

Councillor G Ridley  
Councillor P Male

Other Non-Voting  
Members:

Councillor N Akhtar  
Councillor J Clifford  
Councillor R Lakha

Employees (by Service):

Interim Chief Executives

B Hastie (Interim Chief Executive (Section 151 Officer)),  
K Nelson (Interim Chief Executive (Chief Operation Officer))

Business, Investment  
and Culture

D Hope; K Mawby

Finance

P Jennings

Law and Governance J Newman (Chief Legal Officer), M Salmon

Transportation and  
Highways S Evans, J Seddon

Apologies: Councillor B Gittins  
Councillor R Singh

## **Public Business**

### **87. Declarations of Interest**

There were no disclosable pecuniary interests.

## **RECOMMENDATION**

### **91. Electric Vehicle Charging Infrastructure - Procurement**

The Cabinet considered a report of the Director of Transportation and Highways, which would also be considered at the meeting of Council on 21<sup>st</sup> March 2023, that sought approval to make bid submissions to the Office for Zero Emission Vehicles (OZEV) for up to £5m from the funding portfolio set aside to facilitate rollout of electric vehicle charging units and associated infrastructure.

This investment would enable the Council to further enhance charging facilities in Coventry and maintain its position as the best city in the UK in which to own an electric vehicle. The Council had already secured £2.8 million funding from OZEV between 2019 and 2022 under the Electric Vehicle Charging Infrastructure funding initiative ("EVCI"), leading to a network of 568 chargers, with a further 157 being operational by January 2023, taking the total to 721 chargers capable of charging 959 electric vehicles at any one time. This represented the largest network of any city outside London.

To deliver this network, Coventry City Council had so far entered into two Contracts to provide, install, maintain, and operate charge points under the EVCI scheme. However, the Council had now reached the maximum expenditure permitted under the current contracts, meaning it was necessary to procure another electric vehicle charge point supplier.

The Council published a tender on 22 November 2022 to procure a charge point operator to deliver further residential charge points across the city via a concession contract to ensure readiness where the Council was successful in securing further funding from OZEV.

Cabinet agreed to recommend that Council:

- 1) Delegates authority to the Director of Transportation and Highways, following consultation with the Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change, to submit bids to



OZEV for up to £5m EVCI funding and, if successful, to finalise the terms of, and enter into, the relevant legal agreements (including the procured concession agreement) as well as any associated documents deemed necessary.

- 2) Delegates authority to the Director of Transportation and Highways, following consultation with the Ward Members and Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change, to approve charging point locations across the City.
- 3) Adds any successful funding bids up to £5million to the Council's capital programme.

**RESOLVED that Council is recommended to:**

- 1) **Delegates authority to the Director of Transportation and Highways, following consultation with the Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change, to submit bids to OZEV for up to £5m EVCI funding and if successful to finalise the terms of, and enter into, the relevant legal agreements (including the procured concession agreement) as well as any associated documents deemed necessary.**
- 2) **Delegates authority to the Director of Transportation and Highways, following consultation with the Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change to approve charging point locations across the City.**
- 3) **Agrees to add any successful funding bids up to £5million to the Council's capital programme.**

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Cabinet  
Council

14<sup>th</sup> February 2023  
21<sup>st</sup> March 2023

**Name of Cabinet Member:**

Cabinet Member for City Services- Councillor P Hetherton  
Cabinet Members 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 (City wide)

**Title:**

Electric Vehicle Charging Infrastructure - Procurement

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**Is this a key decision?**

Yes - the proposals within the report have financial implications in excess of £1m and significantly impacts on all wards in the city

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**Executive summary:**

This report seeks approval to make bid submissions to the Office for Zero Emission Vehicles (OZEV) for up to £5m from the funding portfolio set aside to facilitate rollout of electric vehicle charging units and associated infrastructure.

This investment will enable the Council to further enhance charging facilities in Coventry and maintain our position as the best city in the UK in which to own an electric vehicle. The Council has already secured £2.8 million funding from OZEV between 2019 and 2022 under the Electric Vehicle Charging Infrastructure funding initiative ("EVCI"), leading to a network of 568 chargers, with a further 157 being operational by January 2023, taking the total to 721 chargers capable of charging 959 electric vehicles at any one time. This represents the largest network of any city outside London.

To deliver this network, Coventry City Council has so far entered into two Contracts to provide, install, maintain, and operate charge points under the EVCI scheme. However, we have now reached the maximum expenditure permitted under the current contracts, meaning it is necessary to procure another electric vehicle charge point supplier.

The Council published a tender on 22 November 2022 to procure a charge point operator to deliver further residential charge points across the city via a concession contract to ensure readiness where the Council is successful in securing further funding from OZEV.

**Recommendations:**

Cabinet is requested to recommend that Council:

1. Delegate authority to the Director of Transportation and Highways, following consultation with the Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change, to submit bids to OZEV for up to £5m EVCI funding and, if successful, to finalise the terms of, and enter into, the relevant legal agreements (including the procured concession agreement) as well as any associated documents deemed necessary.
2. Delegate authority to the Director of Transportation and Highways, following consultation with the Ward Members and Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change, to approve charging point locations across the City.
3. Agree to add any successful funding bids up to £5million to the Council's capital programme.

Council is asked to:

1. Delegate authority to the Director of Transportation and Highways, following consultation with the Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change, to submit bids to OZEV for up to £5m EVCI funding and if successful to finalise the terms of, and enter into, the relevant legal agreements (including the procured concession agreement) as well as any associated documents deemed necessary.
2. Delegate authority to the Director of Transportation and Highways, following consultation with the Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change to approve charging point locations across the City.
3. Agree to add any successful funding bids up to £5million to the Council's capital programme.

**List of Appendices included:**

N/A

**Background papers:**

None

**Other useful documents**

Taking charge: the electric vehicle infrastructure strategy - [Click Here](#)  
Coventry Transport Strategy  
Equality Impact Assessment 1

**Has it or will it be considered by scrutiny?**

No

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

No

**Will this report go to Council?**

Yes – 21<sup>st</sup> March 2023

**Report title:** Electric Vehicle Charging Infrastructure - Procurement

**1. Context (or background)**

- 1.1. The Office for Zero Emission Vehicles (OZEV) have confirmed another round of On-street Residential Charging Scheme (ORCS) funding of £20M as part of the Electric Vehicle Charging Infrastructure (EVCI) programme presenting the Council with an opportunity to submit new applications for the supply, installation, and maintenance of on-street residential charge points in Coventry.
- 1.2. At present the Office for Zero Emission Vehicles have two funding sources to deliver electric vehicle charging infrastructure; ORCS and LEVI (Local Electric Vehicle Infrastructure), as part of the EVCI strategy, published in March 2022.
- 1.3. The Council has been successful in previous applications to OZEV. The Council's success in bidding for funding for on street charge points has meant that the Council have spent up to the limit permitted under the current Contracts with two charging point operators. This has led to 721 residential charge points successfully being installed under the two Contracts using £2.8m of external funding.
- 1.4. The Council fully intends to make multiple bids for the new OZEV announced funding to build upon the successful programme completed to date. The first of the Council bids will be to facilitate an additional 450 charge points installed in residential streets where off-street parking is not available. The Council therefore needs to procure a charge point operator to enable the delivery of such charge points (if the Council is successful with its funding bids) with such concession contract also containing flexibility to allow for future charge point installations (if the Council is successful with its further funding bids).
- 1.5. Electric car charging infrastructure can also help support future development opportunities in Coventry. This could include provision of charging points at park and ride sites to provide a more convenient way of travelling into the city centre and to key employment sites, allowing drivers to park their vehicle on charge and finish their journey by foot, cycle, bus, or potentially in the future Very Light Rail. Electric charging points are also required to be installed in at least 5% of all new car parking spaces in Coventry, as set out in the Local Plan.
- 1.6. This work will also form an important element of the City Council's desire to improve air quality in the city. Coventry City Council is preparing bids to OZEV for EVCI projects.

**2. Options considered and recommended proposal**

- 2.1 In terms of bidding, the options considered are:
  - a) to do nothing
  - b) submit applications to OZEV for further funding to increase the On-street Residential Chargepoint Schemes network in the city.
- 2.2 The recommended option is to bid for the maximum amount available in order to Coventry's status as the best city in which to own an electric car. This is important to ensure we tackle the causes of climate change as well as improving air quality in Coventry and supporting local manufacturers and innovators.
- 2.3 The proposals will see chargepoints installed on the public highway and on Council land.

- 2.4 It is expected that the private sector (the successful supplier) will invest 40 percent of the project costs. Therefore, the Contract would be with a single supplier whom the client could build a relationship with, which would allow the supplier to build a greater understanding of the Council and City. Through this delivery, the supplier would have the opportunity to give a greater input into potential future on-street residential chargepoint design initiatives. It could also support the Council's funding bid by having a procured supplier and Contract in place, giving confidence in the Council's ability to deliver its bids.
- 2.5 As the funding is part funded by the supplier, the size of the project from the expenditure will require a larger commitment from the suppliers in term of investment, increasing the need for a longer term to allow for the return of the investment and a reasonable return to justify the supplier's significant investment. Therefore, it is proposed that the Contract length is 15+3+2 years (a core Contract length of 15 years, with potential for two extensions of 3 and 2 years). After the expiry of this contract, the ownership of these assets will transfer to the city council, at which point, the Council will either operate these charge points or procure an independent operator.

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

- 3.1. It is proposed to carry out consultation with external stakeholders in the coming months

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

- 4.1. The proposal is to submit applications in 2022/2023 financial year, and if the funding is still available and the city's needs are still valid, then submit applications in 2023/2024 financial year.

4.1.1. The proposal is to deliver the ORCS project in 2023/2024 financial year

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

#### **5.1. Financial Implications**

- 5.1.1. Up to three bids are proposed for submission to OZEV over a three-year period to a maximum value of £5m from the current funding stream announced by OZEV. If the bids are successful, they will be added to the 5-year capital programme and delivered over the next 3 to 4 years using external funding (grant plus private sector funding), with no match funding required from Coventry City Council.
- 5.1.2. For charge points installed on the highway there are one-off costs to the Council related to advertising any Traffic Regulation Orders, any additional signs plus road markings and undertaking consultation with city constituents. It is proposed that these costs are funded from existing CRSTS Local Network Improvement Plan grant budgets (formerly known as the Integrated Transport Programme).
- 5.1.3. The EVCI projects has no cost implications to the City Council including any on-going operating costs of the assets as the costs are covered by OZEV and the supplier. The supplier will be responsible for the running costs of the assets within the contract, which will include EV charge points.
- 5.1.4. There is potential for some revenue to be generated through the schemes, by entering into revenue-sharing agreements with the successful suppliers. It is intended that any resulting net benefit that the Council receives from revenue shares will be reinvested in EV charging schemes.

## 5.2. Legal Implications

- 5.2.1. Law and Governance will be fully involved at every stage of the tender submission, will be responsible for the drafting and approving of the charge point operators' terms and conditions and will be on hand and available to assist and advise on any legal issues that may arise.
- 5.2.2. Furthermore, the procurement referred to in this report will be carried out pursuant to the Council's Contract Procedure Rules and the relevant requirements of the Concession Contract Regulations 2016.
- 5.2.3. Any funding agreement/s issued by OZEV (following any successful funding bid) will be reviewed and approved by legal services and legal services will ensure the charge point operator is contractually bound by the terms of the OZEV funding.
- 5.2.4. Any funding received will be compliant with applicable subsidy law including the UK-EU Trade and Cooperation Agreement and the Subsidy Control Act 2022.
- 5.2.3 On the adopted highway, Traffic Regulation Orders (TRO) will be required for the parking spaces for EV rapid chargers to make them enforceable. Once the locations have been finalised, a TRO will be advertised in relation to these spaces. This will trigger a statutory 21-day objection period. If objections are received, they will be subject to a further report to the Cabinet Member for City Services for consideration and decision in regard to the way forward (whether to implement or not).

## 6. Other implications

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

It is considered that the proposals support the Council Plan objective to create an attractive, greener city by making it easier for people to use electric vehicles within the city, thereby reducing vehicle emissions, improving the environment, and tackling climate change, and supporting the delivery of the Local Air Quality Action Plan for Coventry.

### 6.2. How is risk being managed?

Risk is being managed through the project governance.

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

None.

### 6.4. Equalities / EIA?

Equality Impact Assessment has been carried out to assess the impact of change of services on Coventry residents. By undertaking the Equality Impact Assessment, Coventry City Council has ensured that the new service does not discriminate against any protected group, where possible and promotes quality of opportunity.



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

The intention of implementing these chargepoints is that once they are installed and operational, residents will have improved confidence to purchase or lease electric cars as they will be able to charge the vehicle at or near their homes even if they don't have a private driveway or parking. As electric vehicle uptake increases, the (anticipated) reduced levels of CO2 and NO2 emissions should result in improvements to local air quality. This would support the Coventry Local Air Quality Plan which was approved by the Council's Cabinet in July 2020.

**6.6. Implications for partner organisations?**

None

**Report author:**

Shamala Evans-Gadgil, Senior Programme/Project Manager

**Service:**

Transportation and Highways

**Tel and email contact:**

Tel: 02476 976691

Email: shamala.evans-gadgil@coventry.gov.uk

Enquiries should be directed to the above person

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
Contributors:				
Lara Knight	Governance Services Co-ordinator	Law and Governance	25.11.22	30.11.22
Sunny Heer	Lead Accountant	Finance	25.11.22	28.11.22
Graham Clark	Lead Accountant	Finance	28.11.22	29.11.22
John Seddon	Head of Transport and Innovation	Transportation and Highways	25.11.22	25.11.22
Ravinder Sekhon	Principal Officer, Traffic and Road Safety; Traffic and Network Management	Transportation and Highways	25.11.22	29.11.22
Michael Duffy	Category Manager, Procurement	Law and Governance	21.11.22	21.11.22
Names of approvers for submission: (officers and members)				
Gurbinder Sangha	Corporate and Commercial Lead Lawyer	Law and Governance	25.11.22	25.11.22
John Redfern	Corporate and Commercial Lawyer	Law and Governance	25.11.22	25.11.22
Phil Helm	Finance Manager	Finance	25.11.22	29.11.22
Rachel Goodyer	Head of Traffic, Traffic and Network Management	Transportation and Highways	25.11.22	01.12.22
Colin Knight	Director of Transportation and Highways	-	25.11.22	25.11.22
Mamta Kumar	Equalities and Diversity Assistant, Public Health Insight Team, Public Health Services	Public Health and Wellbeing	25.11.22	02.12.22
Councillor J O'Boyle	Cabinet Member for Job, Regeneration and Climate Change	-	20.01.23	20.01.23
Councillor P Hetheron	Cabinet Member for City Services	-	20.01.23	23.01.23

This report is published on the council's website: [www.coventry.gov.uk/meetings](http://www.coventry.gov.uk/meetings)

**Council – 21<sup>st</sup> March 2023**  
**Recommendation from Cabinet**  
**14<sup>th</sup> February 2023**

**Coventry City Council**  
**Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 14th February 2023**

Present:

Members:

Councillor G Duggins (Chair)  
Councillor AS 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 G Hayre  
Councillor G Lloyd

Non-Voting Opposition  
Members:

Councillor G Ridley  
Councillor P Male

Other Non-Voting  
Members:

Councillor N Akhtar  
Councillor J Clifford  
Councillor R Lakha

Employees (by Service):

Interim Chief Executives

B Hastie (Interim Chief Executive (Section 151 Officer)),  
K Nelson (Interim Chief Executive (Chief Operation Officer))

Business, Investment  
and Culture

D Hope; K Mawby

Finance

P Jennings

Law and Governance J Newman (Chief Legal Officer), M Salmon

Transportation and  
Highways S Evans, J Seddon

Apologies: Councillor B Gittins  
Councillor R Singh

## **Public Business**

### **87. Declarations of Interest**

There were no disclosable pecuniary interests.

## **RECOMMENDATION**

### **92. Coventry UK Shared Prosperity Fund 2023-2025**

The Cabinet considered a report of the Director of Business, Investment and Culture, which would also be considered at the meeting of Council on 21<sup>st</sup> March 2023, that sought approval to accept West Midlands Combined Authority's (WMCA) allocation to Coventry of up to £11.3m of the UK Shared Prosperity Fund (UKSPF).

In April 2022, the UK Government launched its new UKSPF. A total of £2.6bn in funding was available until March 2025, and the allocation for the West Midlands was £88.4m. UKSPF would fund vital activities across three themes:

- People & Skills
- Communities & Place
- Local Business

UKSPF was intended to be the successor to the European Structural Funds which were currently used to fund Coventry's business support, employment, and skills activities. These EU funded schemes would come to a close during the second half of 2023, and it was therefore crucial for the city to get the right deal from UKSPF. The WMCA was the accountable body for UKSPF and had agreed high level priorities for the way in which the money would be used in the region, which the Council had been consulted on. Coventry's indicative allocation for funding was £11.3m, and the report sought authority to accept WMCA's UKSPF allocation for Coventry.

Using funding from the first two themes, Coventry was requesting UKSPF funding to establish a hub and spoke model to provide employment support across the city, with a particular focus on key areas of deprivation with target groups including those who are 50+ and unemployed, economically inactive and low paid women, ethnic minorities, those with disabilities and health conditions, those with multiple complex needs and young people who were NEET (not in employment, education or training). Support would be delivered through the Job Shop and in partnership with voluntary and community sector (VCS) organisations.

Under the Local Business theme, funding would be requested for a network of business advisors who would work with small and medium enterprises (SMEs), people starting new businesses and with social enterprises. These advisors would help business start, expand, take on new staff, develop new products or expand into new premises etc. This work would link to a pot of SME competitiveness grants which would provide funding for new building and equipment or for specialist advice to support growth and innovation. Funding would also be requested to build on the success of the Coventry and Warwickshire Green Business Programme by providing specialist decarbonisation advice to businesses including energy audits, again supported by a pot of grant funding. For businesses seeking private funding in the form of debt or equity, Investor Readiness training would be provided, likely as part of a West Midlands-wide programme.

The report requested authority to accept WMCA's allocation to Coventry of up to £11.3m of UKSPF money for these activities, and for delegated authority to enter into funding agreements. Delegated authority was also sought to contract with delivery partners where necessary in order to complete this work.

The Cabinet agreed to:

- 1) Approve the acceptance of WMCA's UK Shared Prosperity Funding allocation to Coventry up to £2.5m
- 2) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer, and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including the authority to enter into funding agreements with the WMCA.
- 3) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer, and the relevant Cabinet Member(s), to enter into back-to-back contracts with delivery partners as deemed necessary.
- 4) Recommend that Council:
  - a) Approve the acceptance of WMCA's Shared Prosperity Funding allocation to Coventry up to a further £8.8m, bringing the total to £11.3m
  - b) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer, and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including the authority to enter into funding agreements with the WMCA.
  - c) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer, and the relevant Cabinet Member(s), to enter into back-to-back contracts with delivery partners as deemed necessary.

- d) Authorise use of the UK Shared Prosperity Funding 4% administration allocation to support the productive delivery and administration of the fund.

**RESOLVED that Council is recommended to:**

- 1) **Approve the acceptance of WMCA's UK Shared Prosperity Funding allocation to Coventry up to a further £8.8m, bringing the total to £11.3m**
- 2) **Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including the authority to enter into funding agreements with the WMCA.**
- 3) **Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer and the relevant Cabinet Member(s) to enter into back-to-back contracts with delivery partners as deemed necessary.**
- 4) **Authorise use of the UK Shared Prosperity Funding 4% administration allocation to support the productive delivery and administration of the fund.**

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Cabinet  
Council

14 February 2023  
21<sup>st</sup> March 2023

**Name of Cabinet Member:**

Cabinet Member for Jobs, Regeneration and Climate Change - Councillor J O'Boyle  
Cabinet Member for Education and Skills - Councillor Dr K Sandhu

**Director approving submission of the report:**

Director of Business, Investment and Culture

**Ward(s) affected:**

All

**Title:**

Coventry UK Shared Prosperity Fund 2023-2025

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**Is this a key decision?**

Yes - the proposals involve financial implications in excess of £1m per annum.

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**Executive summary:**

In April 2022, the UK Government launched its new UK Shared Prosperity Fund (UKSPF). A total of £2.6bn in funding is available until March 2025, and the allocation for the West Midlands is £88.4m. UKSPF will fund vital activities across three themes:

- People & Skills
- Communities & Place
- Local Business

UKSPF is intended to be the successor to the European Structural Funds which are currently used to fund Coventry's business support, employment and skills activities. These EU funded schemes will come to a close during the second half of 2023, and it is therefore crucial for the city to get the right deal from UKSPF. The West Midlands Combined Authority (WMCA) is the accountable body for UKSPF and has agreed high level priorities for the way in which the money will be used in the region, which the Council has been consulted on. Coventry's indicative allocation for funding is £11.3m, and this report seeks authority to accept WMCA's UKSPF allocation for Coventry.

Using funding from the first two themes, Coventry is requesting UKSPF funding to establish a hub and spoke model to provide employment support across the city, with a particular focus on key areas of deprivation with target groups including those who are 50+ and unemployed, economically inactive and low paid women, ethnic minorities, those with disabilities and health conditions, those with multiple complex needs and young people who are NEET (not in employment, education or training).

Support will be delivered through the Job Shop and in partnership with voluntary and community sector (VCS) organisations.

Under the Local Business theme, funding will be requested for a network of business advisors, who will work with small and medium enterprises (SMEs), people starting new businesses and with social enterprises. These advisors will help business start, expand, take on new staff, develop new products or expand into new premises etc. This work will link to a pot of SME competitiveness grants which will provide funding for new building and equipment or for specialist advice to support growth and innovation. Funding will also be requested to build on the success of the Coventry and Warwickshire Green Business programme by providing specialist decarbonisation advice to business including energy audits, again support by a pot of grant funding. For businesses seeking private funding in the form of debt or equity, Investor Readiness training will be provided, likely as part of a West-Midlands wide programme.

The report requests authority to accept WMCA's allocation to Coventry up to £11.3m of UKSPF money for these activities, and for delegated authority to enter into funding agreements. Delegated authority is also sought to contract with delivery partners where necessary in order to complete this work.

### **Recommendations:**

Cabinet is recommended to:

- 1) Approve the acceptance of WMCA's UK Shared Prosperity Funding allocation to Coventry up to £2.5m
- 2) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including the authority to enter into funding agreements with the WMCA.
- 3) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer, and the relevant Cabinet Member(s), to enter into back-to-back contracts with delivery partners as deemed necessary.

Cabinet is asked to recommend that Council:

- 1) Approve the acceptance of WMCA's Shared Prosperity Funding allocation to Coventry up to a further £8.8m, bringing the total to £11.3m
- 2) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including the authority to enter into funding agreements with the WMCA.
- 3) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer and the relevant Cabinet Member(s), to enter into back-to-back contracts with delivery partners as deemed necessary.
- 4) Authorise use of the UK Shared Prosperity Funding 4% administration allocation to support the productive delivery and administration of the fund

Council is recommended to:

- 1) Approve the acceptance of WMCA's UK Shared Prosperity Funding allocation to Coventry up to a further £8.8m, bringing the total to £11.3m



- 2) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including the authority to enter into funding agreements with the WMCA.
- 3) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Interim Chief Executive (Section 151 Officer), the Chief Legal Officer and the relevant Cabinet Member(s) to enter into back-to-back contracts with delivery partners as deemed necessary.
- 4) Authorise use of the UK Shared Prosperity Funding 4% administration allocation to support the productive delivery and administration of the fund

**List of Appendices included:**

None

**Background papers:**

None

**Other useful documents**

None

**Has it or will it be considered by scrutiny?**

No

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

No

**Will this report go to Council?**

Yes - 21 March 2023

## Report title: Coventry UK Shared Prosperity Fund 2023-2025

### 1. Context (or background)

- 1.1. In April 2022, the UK Government Launched its new Shared Prosperity Fund (UKSPF). The objectives of the fund are:
  - Boost productivity, pay, jobs and living standards by growing the private sector, especially in those places where they are lagging
  - Spread opportunities and improve public services, especially in those places where they are weakest
  - Restore a sense of community, local pride and belonging, especially in those places where they have been lost
  - Empower local leaders and communities, especially in those places lacking local agency
- 1.2. The total value of the fund is £2.6bn, with funding being available until March 2025. Coventry's allocation within the fund is £11.3m. The fund is intended to be a successor to the EU Structural Funds such as the European Regional Development Fund (ERDF) and the European Social Fund (ESF). It is important to note that the total value of UKSPF available to Coventry will be considerably less than what was previously available through ERDF and ESF. For the 2014-2020 ERDF and ESF programmes, Coventry & Warwickshire was allocated £118m over 7 years or £16.86m per year – whilst the 6 Coventry & Warwickshire Local Authority areas have been allocated a total of £27.46m in UKSPF covering 3 financial years at an average of £9.15m a year. In most cases EU Structural Fund projects will draw to a close by the end of 2023, with many closing at the end of June 2023.
- 1.3. Management of UKSPF in the West Midlands is the responsibility of WMCA. A total of £88.4m has been allocated for the 7 Council areas that make up the Combined Authority, and Coventry's indicative allocation is £11.3m. Detailed negotiations have been underway for several months about the how this funding can best be used in a way that maintains existing provision that works well in each area, whilst forming part of a consistent approach across the West Midlands.
- 1.4. UKSPF is intended to be more flexible and less bureaucratic than the European funds which it replaces. The objectives of the fund will be met by activities across three themes: People & Skills, Communities and Place, and Local Business.
- 1.5. WMCA's UKSPF Investment Plan was approved by government in November 2022. This is a high-level document which sets out the overall aims for the fund in the West Midlands, and local areas will have the chance to decide how the funding will be used in order to achieve these aims. Coventry and the other councils that make up the WMCA were consulted on and contributed to the development of the plan.

1.6. In Coventry, the allocation of the funding between the three UKSPF priorities as follows:

UKSPF Priority	Funding Allocation
People & Skills Communities & Place	£5.4m (in total, for both priorities)
Local Business	£5.4m

\*Note that the remaining 4% will be retained for programme management, and it is expected that some of this funding will be made available to individual local authorities.

- 1.7. Because People and Skills money does not become available until 24/25, Coventry City Council Employment and Skills Service (CCC ESS) successfully negotiated with WMCA flexibility to move money between People and Skills and the Communities and Place priority. This will allow crucial work to assist people furthest away from the job market to begin as soon as European funded projects close and avoid a gap in provision. Of the total budget for Coventry, 50% will be made available for these two priorities.
- 1.8. Communities & Place and People & Skills UKSPF funding has been ‘delegated’ to LA’s. As a result of our successful negotiations, WMCA have agreed that CCC ESS can determine local priorities for Coventry within these two funding strands and take the lead role in designing the programme of support. Working together with WMCA we have agreed a new ‘hub and spoke’ delivery model which will deliver on Coventry’s employment and skills priorities. However, as Lead Accountable Body, WMCA can require us to make changes and will hold the Council to account in meeting their criteria, which means current plans may be adapted later in the UKSPF programme.
- 1.9. Under the People & Skills and Communities & Place strand CCC ESS will deliver a ‘hub and spoke’ mode, providing person centred, holistic employment support across the city. Support will target key areas of deprivation with target groups including those who are 50+ and unemployed, economically inactive and low paid women, ethnic minorities, those with disabilities and health conditions, those with multiple, complex needs and young people who are NEET (not in employment, education or training). Support will be delivered through the Job Shop and in partnership with voluntary and community sector (VCS) organisations.
- 1.10. The remaining 50% will be directed towards business support activity, which will principally include locally delivered business advice and grants to support business competitiveness and growth. The specific types of activities proposed under the Local Business theme include:
- 1.11. **SME Growth Advisors.** Each area will receive UKSPF funding for support to Small and Medium Enterprises, entrepreneurs and social enterprise. In Coventry it is anticipated that this funding will be used to continue the work of our highly successful business support partnership, where advisors from the Council, the Growth Hub, the Chamber of Commerce and other partners provide advice and support to local businesses to grow, establish new products and create jobs by taking on new staff. Support to help start a new business will also be provided as part of this activity.
- 1.12. **SME Competitiveness Grants.** A pot of grant funding will be available to link to the work of the SME Growth Advisors. Businesses with a plan to buy new equipment, take on new staff, establish new premises etc. will be able to apply for a grant ranging from £5,000 to £100,000. Revenue

grants for specialist external expertise to support growth and innovation will also be available. The grants will be matched 50/50 with the funding provided by the applicant business. This will build on the work of our very successful Investment Fund and Innovation Grants programmes which are currently funded through ERDF. The indicative value of this pot is £1.15m over two years.

- 1.13. **Decarbonisation Advice and Grants.** Building on the established Coventry and Warwickshire Green Business Programme, we are aiming to secure UKSPF funding to help Coventry businesses play their part in meeting the UK's target of net zero emissions whilst at the same time enhancing their competitiveness and sustainability. The new programme will offer one-to-one and one-to-many information and advice, including peer networks thereby helping businesses to understand how they can work towards becoming net zero, and understand how new regulations will affect them. This funding will also provide energy audits that will allow businesses to quantify and benchmark their emissions by examining the energy used by their building and equipment and identify cost-effective energy saving measures supported by grant funding.
- 1.14. **Investor Readiness.** In addition to direct grant funding, support will also be provided to strengthen the SME sector's ability to access external, private finance. These activities focus on equity finance (raising capital in exchange for an ownership share) or debt finance (applying for bank loans) and will be aimed at SMEs with the highest growth potential. Ensuring that Coventry's SMEs are able to access private finance is essential to supporting their growth, and this offer will be key to achieving that. This activity is likely to be delivered by a WM-wide programme, and the Council's likely role here will be to ensure that the offer is promoted to and tailored correctly for Coventry's businesses to gain the full benefit of the available funding.
- 1.15. Coventry City Council will act as lead partner for business support activities in the Coventry area initially, and there may be opportunities to deliver these activities in other parts of the region. Currently, business support programmes are delivered in Coventry and Warwickshire; as Warwickshire is not a constituent member of the WMCA, the area's UKSPF allocation is not part of the overall West Midlands pot. However, Coventry City Council will bid or tender for UKSPF work in Warwickshire if the opportunity arises, and it is the right approach both for Coventry and neighbouring Warwickshire authorities. Other West Midlands authorities may choose to request that Coventry delivers some of the business support themes in their areas, and should this be the case, this will be considered as long as the Council can secure additional UKPSF from that area's allocation in order to cover the costs of this additional delivery.

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

- 2.1. The Council could have chosen to decline the opportunity to act as the lead delivery body for UKSPF activity in Coventry. With WMCA having overall responsibility for the funding and accountability to government, the Council could have chosen to undertake a purely strategic role, working with WMCA to define the activities that would make the biggest difference in the city, and leaving them to commission the activity from third party providers. This approach has been discounted because the Council has an excellent track record of using EU and UK Government funding to run successful projects in both business support and employment & skills activities. The Council is the lead partner in both sets of activities, and if it did not take on this role there is a risk that the overall offer for business and residents would be much poorer, and partner organisations that deliver essential services would struggle to secure funding.
- 2.2. The recommended option is for Coventry City Council to act as the lead body for UKSPF in both business support and skills & employment activities covering Coventry. This will allow the Council to continue to act as lead partner in these activities, providing its own high quality in-house delivery where appropriate, and working with external partners and the voluntary sector to ensure

that specialist provision is available where that is required. The Council currently takes this approach in both European Social Fund (ESF) and European Regional Development activities and successfully leads highly effective partnerships to make the most of both funding sources. The preferred option is that Coventry City Council continues to act in this role with the new UKSPF funded work.

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

- 3.1. Securing UKSPF will support the aims of the Council's Economic Development Strategy and Skills Strategy, both of which were approved the Cabinet in October 2022. In preparation of these strategies consultation was undertaken with the public, as part of the overall One Coventry Plan consultation process.

The Council is also consulting with its partner organisations in order to decide on the priorities for UKSPF in Coventry. This includes Coventry and Warwickshire Growth Hub, Coventry and Warwickshire Chamber of Commerce, Coventry University, University of Warwick and the majority of Voluntary and Community Sector organisations. This consultation will continue during the development of bids / tenders and into the delivery phase. A stakeholder engagement event for VCS organisations working on employment and skills activities has been arranged for 23 January.

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

- 4.1. The current UKSPF programme makes funding available during the financial years 2022/23, 2023/24 and 2024/25. With ERDF closing in June 2023, and ESF programmes closing in December 2023, the aim is to establish the Coventry UKSPF funded activity in time to allow continuity of provision post EU funding.

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

#### **5.1. Financial Implications**

The report seeks authority to accept an allocation of up to £11.3m of external UKSPF grant for the purposes set out in section 1 of the report. This is the indicative allocation for Coventry from a wider WMCA allocation for the region of £88.4m

It is not expected that match funding is required, however where this may be the case, this will be achieved using existing operational budgets in the Economic Development and Employment and Skills services. No new commitments of match funding will therefore be required as a result of the decisions recommended in this report.

The vast majority of the grant monies awarded will be directed at the services set out in the report, a small contribution of c4% will however be retained to cover local management costs of the EDS and ESS teams, whose budgets are set up to require funding from the grant regimes they deliver

The WMCA is the nominated Accountable body for the UKSPF, however they will in awarding monies to the City Council pass delivery risk to the City Council through formal legal Grant Aid Agreements. See section 6.2 of the report which outlines the approach to risk management.

## 5.2. Legal Implications

All the activities carried out with UKSPF funding will need to comply with Subsidy Control Legislation that has now come into force. Under the new regime, public authorities will be required to self-assess whether the financial assistance they grant is consistent with key principles and will be required to publish information about subsidies. A Subsidy Advice Unit will be established within the Competition and Markets Authority, which will have oversight of the new regime and will be responsible for advising public authorities on more complex subsidy measures.

CCC Legal will work with the delivery teams to ensure that any support provided to businesses or delivery partners is compliant with the new rules.

The rules governing Public Procurement will also need to be complied with. To demonstrate value for money, procurement to deliver the range of projects if funding is secured, will be considered per project in accordance the grant, the Councils Contract Procedure Rules and the Public Contract Regulations 2015.

## 6. Other implications

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

Securing UKSPF will make a very important contribution to the achievement of the Council's core aims. The activities through the Local Business Priority are expected to help to deliver the One Coventry Plan's objective of Improving the Economic Prosperity of the City and Region by helping businesses to grow, take on new staff, expand into new premises and also provide access to employees with the appropriate skills through the employment and skills activity that is proposed here. Work funded through UKSPF will also raise the profile of Coventry, as more local businesses are helped to export their products internationally, providing trade links with other countries. The Decarbonisation activities will also be expected help to "Tackle the Causes and Consequences of Climate Change". The People & Skills and Communities & Place activities will also support this objective through enabling local residents to have the skills to support business growth.

The funding, particularly through the People & Skills and Communities & Place Priorities, will also help to address the objective of "Improving Outcomes and Tackling Inequalities Within Our Communities", by helping local people find jobs, and also helping people to continue to develop their skills once they are in work.

Finally, securing the UKSPF funding and acting as lead partner for delivering of business and employment and skills activities will contribute to the Council's aim to act as leader and enabler for the city, ensuring that through our relationship with WMCA and with our delivery partners, the very best outcomes are achieved for our residents and businesses.

### 6.2. How is risk being managed?

Coventry City Council has a long track record of delivering externally funded skills and business support projects, and the risks associated with this type of work are well understood. For example, there are financial risks such as the failure to deliver output or financial targets, and the risk that this could lead to funding clawback. Risks of this kind are mitigated by ensuring that sufficient programme management resource is available to enforce adherence to the funder's rules, and to work closely with delivery partners to ensure they are producing eligible outputs on time and on budget. There is sufficient experience in the delivery teams in the Economic Development Service

and the Employment Skills and Adult Education Service to manage these risks appropriately at service or division level and an entry on the corporate risk register will not be necessary for this

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

The principal impact on the organisation will be securing funding for staff directly employed by the Council working on our business support or employment and skills activities. Successfully bidding for UKSPF funding for these programmes will provide funding crucial to retaining highly skilled staff currently working on projects which are due to come an end later this year. There are no impacts on ICT, accommodation, assets etc.

### **6.4. Equalities / EIA?**

A detailed Equalities Impact Assessment of the new business support programmes and employment and skills activities which will be funded by UKSPF will be completed in time to allow findings to be taken into account before the new programmes open later in 2023. Due to the reduction of funds from ESF to UKSPF there will be less funding directed at communities than previously. We will use UKSPF effectively to ensure maximum community impact, but this can still only partially mitigate for the loss of funds. The Equalities Impact Assessment will consider this impact for our communities. We also need to consider the barriers to accessing business support; for example whether people from different ethnic groups are less likely to benefit from the support we provide or whether some areas of the city are more difficult for projects to reach. Equalities impact work has also been completed for the Economic Development Strategy and Skills Strategy, which will inform the approach to this work.

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

If our bids are successful, UKSPF will be used to secure funding to continue the work of the Coventry and Warwickshire Green Business Programme which has had a positive impact on the environment by helping to reduce carbon emissions from local businesses. If this work can continue the decisions recommended in this report will have a positive impact on climate change and the environment. Our Skills Strategy sets out a clear priority to ensure our skills provision has a strong focus on green skills. Our UKSPF employment support programmes will support this through ensuring residents are able to access available 'green skills' provision, are given good quality 'green skills' careers advice, connected to employers offering jobs.

### **6.6. Implications for partner organisations?**

A proportion of the Coventry UKSPF will be used to fund the Council's partner organisations in business support, employment and skills programmes. Because the funding available will be considerably less than in previous programmes there is likely to be some impact on partner organisations, particularly VCS organisations involved in employment and skills delivery. The Council will continue to offer the same proportion of the available funding to VCS organisations as it did under previous funding programmes. A stakeholder engagement event has been organised with key VCS organisations, which will be followed by a bidding process in February and March. Successful VCS applicants will then be in a position to begin delivery from April.

**Report author(s):**

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Glen Smailes	Skills and Partnerships Lead	Business, Investment and Culture - Employment and Skills	3 <sup>rd</sup> Jan 2023	10 <sup>th</sup> Jan 2023
Michelle Salmon	Governance Services Officer	Law and Governance	17 <sup>th</sup> Jan 2023	17 <sup>th</sup> Jan 2023
<b>Names of approvers for submission: (officers and members)</b>				
Phil Helm	Finance Manager	Finance	9 <sup>th</sup> Jan 2023	13 <sup>th</sup> Jan 2023
Oluremi Aremu	Head of Legal and Procurement	Law and Governance	9 <sup>th</sup> Jan 2023	16 <sup>th</sup> Jan 2023
Andy Williams	Director of Business, Investment and Culture	-	16 <sup>th</sup> Jan 2023	19 <sup>th</sup> Jan 2023
Councillor J O'Boyle	Cabinet Member for Jobs, Regeneration and Climate Change	-	19 <sup>th</sup> Jan 2023	24 <sup>th</sup> Jan 2023
Councillor Dr K Sandhu	Cabinet Member for Education and Skills	-	16 <sup>th</sup> Jan 2023	16 <sup>th</sup> Jan 2023

This report is published on the council's website: [www.coventry.gov.uk/meetings](http://www.coventry.gov.uk/meetings)





## Public report Cabinet Report

Cabinet  
Council

14<sup>th</sup> March 2023  
21<sup>st</sup> March 2023

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources – Councillor R Brown

**Director Approving Submission of the report:**

Interim Chief Executive (Section 151 Officer)

**Ward(s) affected:**

All

**Title:**

Household Support Fund Grant Acceptance

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**Is this a key decision?**

Yes - the proposals involve financial implications in excess of £1m per annum and are likely to have a significant impact on residents or businesses in two or more electoral wards in the City.

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**Executive Summary:**

Since October 2021 the Council has been supporting Coventry households with the costs of food, fuel and related essentials through the Household Support Fund grant provided by the Department for Work and Pensions.

A new phase of Household Support Fund is due to commence from 1<sup>st</sup> April 2023 lasting until 31<sup>st</sup> March 2024, this report requests acceptance of the £6.4M grant funding and sets out the planned approach to deliver this support. The report also requests delegated authority to agree the final arrangements for delivery of the scheme.

**Recommendations:**

Cabinet is requested to recommend that Council:

- (1) Note the content of the report and approve acceptance of the amount of the grant funding received from the Department for Works and Pension for financial year 2023/24 which shall be utilised towards the principles of the Household Support Fund scheme as outlined in the report.

- (2) Delegate authority to the Interim Chief Executive (Section 151 Officer), following consultation with the Cabinet Member for Strategic Finance and Resources and Cabinet Member for Housing and Communities, to agree the final arrangements for the delivery of this scheme, within the grant allocation provided, and in line with the scheme guidance published on 20th February 2023.

Council is recommended to:

- (1) Note the content of the report and approve acceptance of the amount of the grant funding from the Department for Works and Pension for financial year 2023/24 which shall be utilised towards the principles of the Household Support Fund scheme as outlined in the report.
- (2) Delegate authority to the Interim Chief Executive (Section 151 Officer), following consultation with the Cabinet Member for Strategic Finance and Resources and Cabinet Member for Housing and Communities, to agree the final arrangements for the delivery of this scheme, within the grant allocation provided, and in line with the scheme guidance published on 20th February 2023.

**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 – 21<sup>st</sup> March 2023

## **Report title:** Household Support Fund Grant Acceptance

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

- 1.1 In response to the Covid-19 pandemic the Council provided support to Coventry households that were experiencing or at risk of food or fuel poverty between December 2020 September 2021 through two government grants; the Covid Winter Grant Scheme (WGS) and the Covid Local Support Grant (LSG).
- 1.2 In October 2021 the Department for Work and Pensions (DWP) launched a further 6-month grant called the Household Support Fund (HSF) which was to provide support to those most in need with their food, energy and water bills over winter 2021/22, during the next stage of economic recovery. Since that point there have been two further extensions of the Household Support Fund to provide help with inflationary challenges and the cost-of-living crisis which emerged during 2022.
- 1.3 Councils have discretion over how these funds can be used (within the scope of the grant guidance) but in the main councils have been asked to prioritise support with the costs of food and energy, essential costs related to food and energy, and with wider essential costs.
- 1.4 Support for these schemes was provided to households through a variety of routes. Application-based support has been delivered through the Community Support Customer Service team which has provided financial support for energy & utility bills, domestic appliances, warm clothing, and food parcels through voluntary sector partners. Support has also previously been provided in the form of supermarket vouchers directly targeted to families of children eligible for Free School Meals, pensioner households and households in receipt of council tax support.
- 1.5 Over the course of the Household Support Fund period, and as the cost of living increasingly impacted on households, the level of demand for support has been increasing, particularly through the Council's application-based support process, where applications per day have risen from an average of 20 per day in spring 2022 to 80 per day in winter 2022. Alongside this, each time an extension was delivered the grant guidance was amended.
- 1.6 In his Autumn Statement on 17<sup>th</sup> October 2022 the Chancellor set out a further, 4<sup>th</sup> phase of the Household Support Fund with £1Bn of national funding to cover April 2023 to March 2024. In grant documentation published on the 20<sup>th</sup> February Coventry was allocated £6.4M – the same amount of funding as the previous year's HSF schemes.
- 1.7 Whilst inflation continued to grow throughout the majority of 2022/23 there are signs it is now stabilising and is forecast to decrease during 2023/24. With benefits also set to rise by 10.1% from April 2023 we would expect demand on the grant to begin to reduce but will need to keep this under review.

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

- 2.1 Coventry City Council could decide not to accept the grant. The consequence would be that without these financial resources Coventry households would lose out on the financial support that the Council has been able to provide to vulnerable households. This is not the recommended option.
- 2.2 It is recommended that the Council accepts this grant, at a value of £6.4M, and provides support to Coventry households during 2023/24 based on the principles outlined below:

- Application-based or direct support to vulnerable households with the costs of Food, Energy and related essentials. This may be either directly provided by the City Council or via other voluntary sector partners.
- Direct award of supermarket voucher support to families with children eligible for Free School Meals (FSM), and equivalent to FSM for Early Years age children.
- Scheme to be delivered within the £6.4M grant allocation.

2.3 It is also recommended that authority is delegated to the Interim Chief Executive (Section 151 Officer), following consultation with the Cabinet Member for Strategic Finance and Resources, and Cabinet Member for Housing and Communities, to agree the final arrangements for the delivery of the scheme in line with the scheme guidance which was published on the 20<sup>th</sup> February.

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

3.1 No consultation has been completed in relation to this latest allocation. The Council has engaged with voluntary sector partners over the course of the Household Support Fund period as part of the set-up and delivery of the schemes.

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

4.1 The scheme is due to commence from 1<sup>st</sup> April 2023.

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

#### **5.1 Financial implications**

The value of the Household Support Fund grant for 2023/24 is £6.4m. With any scheme such as this which is demand driven within a set of eligibility criteria, there is a fine balance to be found in setting the level of support when the demand is unknown.

As set out within the report, the final arrangements for the delivery of this scheme will be determined once the Department for Work and Pensions has published the 2023/24 allocation and grant guidance, however it will be necessary to continue to monitor spend throughout the year, and modify the delivery plan as necessary, to ensure that the Council can deliver the scheme within the resources available.

With funds only confirmed for 2023/24 it is important that the scheme design does not create long term dependence on what is ultimately a short-term service.

#### **5.2 Legal implications**

The Council has no specific statutory duty to deliver supplementary welfare support to Coventry households.

By section 31(3) and 31(4) of the Local Government Act 2003 (Power to pay grant) the Department for Work and Pensions has made grant provision available to enable local authorities to provide support to households, who would otherwise struggle to buy food or pay essential utility bills or meet other essential living costs or housing costs (in exceptional cases of genuine emergency), to help them with significantly rising living costs.

The Grant Determination sets out the conditions upon which the grant has been made available and to which the local authority must comply.

Law and Governance support the recommendations outlined in this report and will support the process, ensuring the interest of the Council are protected.

## **6 Other implications**

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

By the nature of this scheme the Household Support Fund will contribute to the Council's objectives of protecting our vulnerable people, enabling them to exercise choice and control in their daily lives and improving health and wellbeing by supporting them when they need help.

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

The final scheme will not be designed until the grant guidance is available to ensure that the scheme is compliant with the grant conditions. Whilst the service is demand driven, which by its nature creates a financial risk, the scheme will be designed to manage this where possible and spend will be closely monitored to ensure it remains within the allocation awarded.

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

The delivery and management of the HSF scheme requires the involvement a number of officers from across the council both in terms of the administration of the grant and the front-line delivery of awards to households.

### **6.4 Equality Impact Assessment (EIA)**

An EIA has been completed. It identified both positive and negative impacts for protected groups and plans have been introduced to address these by putting in place mitigating action to reduce digital barriers to accessing support and reducing inequality of access amongst underrepresented groups. The HSF scheme will also be involved in the Council's Equality Objective 1 project which aims to create a foundation to drive improved access to services through better use of equalities data.

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

Where households are supported with the award of a replacement of a white good, the company that provides and installs the replacement white good is also contracted to remove and recycle the broken appliance.

Where households that apply to the HSF scheme are in need of energy efficiency support, they are referred to the Council's energy partner Act on Energy who provide advice and can support eligible households to access energy efficiency grants.

### **6.6 Implications for partner organisations?**

Partner organisations who provide cost of living support will benefit from the local authority accepting the grant as they may benefit from an award of funds from it or alternatively the demand on their services may be reduced where other support is made available.

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## Public report Cabinet Report

Cabinet  
Council

14 March 2023  
21 March 2023

### **Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor D Welsh

### **Director approving submission of the report:**

Director of Streetscene and Regulatory Services

### **Ward(s) affected:**

All Wards

### **Title:**

Homes in Multiple Occupation Development Plan Document Proposed Submission (Regulation 19) Consultation

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### **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.

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### **Executive summary:**

Homes in Multiple occupation (HMOs) can provide important accommodation for a range of people including those entering the housing market. However, they can also bring significant disruption to settled neighbourhoods. In order to ensure that HMOs can only come forward in ways that integrate with existing neighbourhoods a Development Plan Document (DPD) was consulted upon between 20 September and 15 November 2022 which identified the key issues and proposed planning policy responses.

DPDs need to be taken through a formal six-week publication period ('Regulation 19'), to enable people to make focused representations on whether the plan has been positively prepared, justified, effective and consistent with national policy, before the document is submitted to the Secretary of State for examination. These are the issues which the appointed planning inspector will focus on when they examine the plan and consider whether it's suitable for the Council to adopt it.

This report seeks authority to undertake the Regulation 19 publication period consultation on the 'proposed submission' HMO DPD and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment.

This report also seeks authority, once the publication period has closed, to submit the DPD and associated documentation to the Secretary of State for independent examination by an appointed Planning Inspector.

Members should note that when the HMO DPD report was authorised for the initial Regulation 18 consultation by Cabinet on 30<sup>th</sup> August 2022 and Council on 6<sup>th</sup> September 2022, a consultation on an Article 4 Direction (to remove Permitted Development Rights from HMOs in certain wards) was also authorised at the same time. The Article 4 Direction is not included in this report as it is following a different legal process and therefore reports on this matter will be produced to Cabinet and Council at the appropriate time.

### **Recommendations:**

Cabinet is requested to:

- 1) Recommend that Council approve the Proposed Submission HMO DPD and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for a six-week publication period to begin at the earliest opportunity.
- 2) Recommend that Council delegate authority to the Director of Streetscene and Regulatory Services, following consultation with the Cabinet Member for Housing and Communities, to submit the DPD and supporting documentation to the Secretary of State for Levelling Up, Housing and Communities once the publication period has closed, to enable independent examination by a Planning Inspector to take place.
- 3) Recommend that Council delegate authority to the Director of Streetscene and Regulatory Services, following consultation with the Cabinet Member for Housing and Communities, to authorise any non-substantive changes to the documents prior to consultation and prior to submission.

Council is requested to:

- 1) Approve the Proposed Submission HMO DPD and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for a six-week publication period to begin at the earliest opportunity.
- 2) Delegate authority to the Director of Streetscene and Regulatory Services, following consultation with the Cabinet Member for Housing and Communities, to submit the DPD and supporting documentation to the Secretary of State for Levelling Up, Housing and Communities once the publication period has closed, to enable independent examination by a Planning Inspector to take place.
- 3) Delegate authority to the Director of Streetscene and Regulatory Services, following consultation with the Cabinet Member for Housing and Communities, to authorise any non-substantive changes to the documents prior to consultation and prior to submission.

### **List of Appendices included:**

The following appendices are attached to the report:

- Appendix 1 - Proposed Submission Regulation 19 HMO DPD
- Appendix 2 - Strategic Environmental Assessment / Sustainability Appraisal
- Appendix 3 – Equalities and Health Impact Assessment
- Appendix 4 – Regulation 18 Consultation Statement



**Background papers:**

None

**Other useful documents**

Adopted Local Plan 2017

HMO evidence base documents – Supporting Case for Homes in Multiple Occupation (HMO) DPD and Article 4 Direction, August 2022 & Houses in Multiple Occupation – The Need for an Article 4 Direction, July 2022

HMP DPD Regulation 18 consultation documents (Draft DPD, Strategic Environmental Assessment Scoping report, Equalities and Health Impact Assessment)

Report to Cabinet and Council (30<sup>th</sup> August and 6<sup>th</sup> September 2022 respectively)

**Has it or will it be considered by scrutiny?**

No

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

No

**Will this report go to Council?**

Yes - 21 March 2023

**Report title:** Homes in Multiple Occupation Development Plan Document Proposed Submission  
(Regulation 19) Consultation

**1. Context (or background)**

- 1.1 Homes in Multiple Occupancy are dwellings where unconnected individuals live with communal facilities. They provide important accommodation for a range of individuals with a range of different needs, including entry-level housing. However, they can also bring significant disruption to settled neighbourhoods. In order to ensure that HMOs can only come forward in ways that integrate with existing neighbourhoods a draft Development Plan Document (DPD) was consulted upon between 20 September and 15 November 2022 which identified the key issues and proposed a series of planning policy responses, which provide a far more detailed framework for assessing planning applications than that currently provided for through Policy 11 of the adopted Local Plan.
- 1.2 The document has been amended to take account of the results of the consultation and is attached at Appendix 1 to the report.
- 1.3 The Regulation 18 consultation was promoted through a variety of means in line with the Statement of Community Involvement (SCI). These included:
- Formal notifications of the consultation, sent via the Planning Policy consultation management system to the specific and general consultation bodies set out in the SCI as well as other individuals and organisations on the database that requested to be notified.
  - The Councils Planning Policy webpage promoted the draft Local Plan Regulation 18 consultation event. This gave people access to information on the consultation as well as the Reg 18 draft HMO DPD and the supporting documentation.
  - The HMO DPD and supporting documents were made available online and in hard copy at the Council House and public libraries.
  - Statutory notices were placed in the Coventry Telegraph newspaper on 29 September 2022
  - Media press release occurred in the local news on 23 September 2022 and on the Councils website homepage and 'Lets Talk' website homepage.
  - Public notices were distributed across the city to raise awareness of the Plan and Consultation (see Appendix 2 to the report).
  - A summary leaflet was made available at libraries, Council Offices and the consultation events. This leaflet set out the main themes of the HMO DPD and encouraged people to have their say on the plan and indicated how they could find out more and have their say. (see Appendix 3 to the report).
  - Social media was also used extensively which included:
    - Tweets and Facebook posts on the Councils official social media accounts during the consultation period;
    - A bespoke post on the Councils YouTube channel which generated 507 views - <https://www.youtube.com/watch?v=ayTKcgwA5Hc>
- 1.4 A comprehensive round of drop sessions was carried out across several public libraries which involved officers answering questions and making available the draft DPD and supporting documents to anyone who attended.
- 1.5 Contact was made with the numerous groups (106) and forums provided by the Councils migration team. Engagement was made with three specific groups and officers attended events/workshops in which the consultation could be discussed and for more information provided to those in attendance. This included the Coventry Refugee and Migrant Centre, Inini Peer Support Group and Carriers of Hope Coventry. Leaflets were left with attendees once the event had taken place. As a result of the methods outlined above, 190

representations were received from a wide range of people and organisations including statutory consultees, special interest groups, neighbourhood planning groups and individual residents. Organisations concerned with HMOs were represented, as were resident groups. A detailed record of the consultation and its outcomes (including consultation on the supporting documentation) can be seen in Appendix 4 to the report.

- 1.6 The key issues raised by respondents to the consultation, along with the officer response and changes to the DPD where applicable are summarised in the table below.

Respondent comments – summary of key issues	Officer response (and proposed changes to the DPD where applicable)
<b>General</b>	
<ul style="list-style-type: none"> <li>- How are the number of HMOs calculated?</li> </ul>	<p>The number and distribution of existing HMOs is made through the following data sources:</p> <ul style="list-style-type: none"> <li>• Council tax records – properties with student exemptions (excluding purpose-built student accommodation and self-contained flats).</li> <li>• Licensing records – properties licensed as an HMO.</li> <li>• Planning records – properties with C4 or Sui Generis planning consent or issued with a Certificate of Lawful Development.</li> </ul>
<b>HMO1: Houses in Multiple Occupation</b>	
<ul style="list-style-type: none"> <li>- The policy proposals set out in Draft Policy HM01 are supported.</li> <li>- Increase in HMOs has led to an increase in vehicular parking and elderly individuals feeling isolated and lonely.</li> <li>- Waste left on the public highways and noise being an issue at certain times of the day for existing residents.</li> <li>- Huge changes to the appearance and feel of the areas that they live.</li> </ul>	<p>Policy HMO1, in conjunction with the other policies contained within the DPD and existing adopted Local Plan policies will be used to assess all future prospective HMO planning applications which, will give the Council greater control in terms of how HMOs are managed through the planning system. General support noted and welcome.</p>
<b>HMO2: Concentrations and Thresholds</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Concentrations are already exceeding 10% and the 100m distance threshold is generally supported.</li> <li>- Lower and higher concentrations need to be considered both in terms of distance and concentration thresholds in certain wards, particularly near the University of Warwick.</li> </ul>	<p>The suggestion to use different figures for the concentration and distance thresholds were tested through the Sustainability Appraisal process (please refer to SA reports). On balance, and based on the SA testing, it is considered to keep the figures as put forward in the Regulation 18 as they are robust and tested through a Local Plan Examination process in other comparable cities. The Council are unable to apply these policies retrospectively so will only be applied if and when the DPD is adopted. Support noted and welcome.</p>

<b>HMO3: Sandwiching</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Sandwiching only relevant to high density areas and consideration should be given to lower density areas.</li> </ul>	<p>Given the city is a predominately high-density area, it is considered that policy HMO3 holds good as set out in the Regulation 18 document. Support noted and welcome.</p>
<b>HMO4: Amenity and Design</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Need to make specific reference to 'Secured By Design' standards.</li> <li>- Character of the neighbourhood can change due to HMO increases by way of increased vehicular parking on street and also green space provision should be insisted when HMO applications are made.</li> </ul>	<p>It is acknowledged that reference to 'Secured By Design' standards in policy HM04 would be beneficial and so a proposed change to policy HM04 and reasoned justification has been made. The Council are unable to apply these policies retrospectively but will use existing policy mechanisms through the Local Plan and Green Space Strategy to address green space matters. If and when the DPD is adopted, the policies will then be used to determine all future HMO planning applications. In any event, the reference to vehicular parking is already addressed through point e) of the policy. Support noted and welcome.</p>
<b>Assessment Process</b>	
<ul style="list-style-type: none"> <li>- General support to the approach.</li> <li>- Para 6.4 is effectively 'throwing the towel in' and is totally unacceptable.</li> <li>- Para 6.4 wording is far too loose and open to interpretation. Even where the existing HMO concentration is high, each and every new proposal must be subjected to rigorous planning scrutiny and the views of local residents must be taken into account.</li> </ul>	<p>Agreed to delete para 6.4 as on balance, the para does not provide added value to the way in which HMO applications will be assessed through the planning application process.</p>

### Next steps

- 1.7 The revised HMO DPD will need to be publicised through a formal six-week publication period ('Regulation 19'), to enable people to make focused representations on whether the plan has been positively prepared, and whether it is justified, effective and consistent with national policy (as set out in the National Planning Policy Framework). The formal representations will be collated and submitted alongside the DPD and supporting documentation to the Secretary of State to enable independent examination to proceed. These are the issues which the appointed Planning Inspector will focus on when they examine the plan and consider whether the Council can adopt it.
  
- 1.8 It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to undertake Strategic Environmental Assessment and Sustainability Appraisal (SEA / SA) for Development Plan Documents. A Scoping Report was consulted on at the same time as the Draft HMO DPD (to determine what issues should be included) and this has informed the SEA / SA of the Regulation 19 HMO

DPD. This is attached at Appendix 2 to the report and will need to be subject to consultation at the same time.

- 1.9 Members should note that when the HMO DPD report was authorised for the initial Regulation 18 consultation by Cabinet on 30th August 2022 and Council on 6th September 2022, a consultation on the Article 4 Direction (to remove Permitted Development Rights from HMOs in certain wards) was also authorised at the same time. The Article 4 Direction is not included in this report as it is following a different legal process and therefore reports on this matter will be produced to Cabinet and Council at the appropriate time.

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

- 2.1 The Council could choose to not progress with a HMO DPD, however, this would not address the issues identified in the attached documents, and as such this option is not recommended.
- 2.2 The Council could choose to instruct officers to redraft the attached DPD and associated documents. However, these have been prepared to respond appropriately to the outcome of the consultation and so this option is not recommended.
- 2.3 The Council could choose to approve the Proposed Submission HMO DPD and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for a statutory six-week publication period to begin at the earliest opportunity, and then to submit the plan for examination. This option is recommended.

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

- 3.1 The consultation statement at Appendix 4 details how the previous consultation was undertaken and how responses were taken into account.

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

- 4.1. With immediate effect

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

- 5.1. Financial Implications

It is the legal responsibility of the Council to meet the costs of the Examination. At the point of examination, the authority is required to engage a programme officer to provide a link between the LPA, the inspector and participants. It is currently anticipated that this role would be appointed externally with a resultant financial cost to be established in due course. Officers will investigate any opportunities for internal sourcing of the role in order to seek to minimise future costs. The costs to the Council will also include the costs of the Inspector and the provision of a venue for examination hearings. These costs will be payable during financial years 2023/24 – 2024/25 and will be managed within existing budget provision.

- 5.2. Legal Implications

The process for preparing a development plan document is contained within the Planning and Compulsory Purchase Act 2004, Localism Act 2011 and the Town and Country Planning (Local Planning) (England) Regulations 2012. Prior to the submission of the DPD to the Secretary of State for examination a consultation period of 6 weeks must take place in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England)

Regulations 2012. The process for preparing Strategic Environmental Assessment / Sustainability Appraisal is contained within the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations)

## **6. Other implications**

### **6.1. How will this contribute to the Council Plan**

This DPD will help ensure that resident's quality of life is maintained and that, where an application is appropriate, that HMOs are more attractive within their current environment., thereby supporting the aims and objectives of the One Coventry Corporate Plan.

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

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

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

No direct impact from having additional planning policies.

### **6.4. Equalities / EIA?**

A full Equality and Impact Assessment (EqIA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010). The Development Planning Document creates additional policy and so a further EIA has been undertaken (Appendix 3 to the report).

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

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

### **6.6. Implications for partner organisations?**

None

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# Coventry City Council

## Homes in Multiple Occupation (HMO)

### Development Plan Document (DPD)

#### Regulation 19: Proposed Submission

March 2023

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# 1. Executive Summary

## **What is a HMO?**

A HMO is defined as a property rented to at least three people who are not from one 'household' (e.g. a family) but share facilities such as a bathroom and kitchen. Planning use classes distinguish between 'small' HMOs of up to six people (C4 use class), and 'large' HMOs of seven or more occupants which are Sui Generis (of their own use class). Some HMOs are purpose-built, e.g. student accommodation, but many are created through the conversion of buildings, both in residential and other uses, which often have the potential to initiate physical and social changes to an area.

## **Why now?**

With the city's growing population, there is a need to ensure that new development supports successful communities by ensuring the right mix of housing types in an area, securing appropriate design and supporting well managed properties. Homes in Multiple Occupation (HMOs) provide an important contribution to peoples housing choice, but can have significant impacts on existing residents. At present, Coventry has a population growth rate faster than the national and regional average. Migration flows into the city have driven population growth particularly within the 'young professional' demographic. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population. This also reflects the growth of the city's further/higher education institutions including the two universities, Coventry University and the University of Warwick.

These demographic changes coupled with economic factors which have made it increasingly difficult for younger people and those on lower incomes to finance permanent home ownership, have consequentially underpinned the growth of the private and social rented sectors. Consequently, for communities where HMO concentration has been most noticeable, there are increasing concerns about the changing nature of their communities and neighbourhoods, and the impacts that this has.

The Development Plan Document (DPD) aims to ensure that such development also preserves the residential amenity and character of an area, and that any potential harmful concentrations do not arise and are managed as far as reasonably possible through the local planning regime.

### **What stage are we at?**

This HMO Development Plan Document (DPD) will, once adopted, form part of the formal Development Plan for Coventry City Council. It is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. This 'Publication Draft' forms part of the statutory consultation required under Regulation 19 of the 2012 Regulations (as amended).

The primary purpose of this HMO DPD is to set out the detailed policy framework that will be used for the determination of HMO planning applications in Coventry. The policies contained within the DPD provide further detail to the strategic policies set out in the Council's Local Plan and City Centre Area Action Plan.

Policies contained within this DPD are intended to further the aims and objectives of both the NPPF and the Coventry Local Plan. They are aimed at guiding both decision-makers and applicants to achieve the highest possible standards of development for HMO proposals in Coventry.

The Regulation 19 DPD is the document that will be submitted to the Planning Inspectorate for examination. It is the version the Council will seek to adopt, subject to that examination, as the future framework for decision making. We will invite representations on the draft DPD. Any comments during the representation period will need to be made within the set period and no late submissions will be accepted.

Representations must be received no later than **xx 2023** and should be submitted online via: <https://coventrycitycouncil.inconsult.uk/system/home>

## 2. Introduction

2.1 Homes in Multiple Occupation (HMOs) are properties rented to at least 3 people who are not from one household (for example, a family) but share facilities like a bathroom or kitchen. As at 2022, planning permission is only required for HMOs which will provide a home for 7 or more people.

2.2 HMOs meet a variety of needs for private rented housing, ranging from young professional 'house-shares' and students wanting to live off campus, as well as providing a vital source of housing supply for people on lower incomes. For many people, HMOs provide a practical and affordable housing option that meets their housing needs. There are, however, significant housing needs that HMOs cannot meet and indeed can impact upon, such as the provision of affordable housing stock for families



2.3 Evidence shows that there has been an increase in HMO development in Coventry over recent years to meet demand. This has resulted in concentrations of HMOs in particular parts of the city which has compounded the associated issues for the neighbouring properties and the wider community. These issues mainly relate to increased parking pressures, noise, management of waste and recycling and anti-social behaviour. This document aims to provide a policy approach to HMOs, housing diversity, residential amenity and parking standards in order to ensure that new HMO developments meet the requirements of our policies in terms of impact on the surrounding areas.

2.4 This will help us to provide much needed new housing options whilst ensuring that new development does not have a negative impact on the character of the surrounding area and nearby properties. The Development Plan Document (DPD) is primarily for use by prospective planning applicants, property developers and landowners, as well as decision makers such as planning officers and elected members. However, it also intended to help local residents understand how the Council intends to apply its planning policies. It is important to note that not all HMOs require planning permission. **This document relates to the management of planning applications for new HMOs when planning permission is required, but also explains the role of the HMO licencing regime which is a separate process that can relate to both HMOs which do, and do not, require planning permission.**

## 3. Policy Context

### National Policy Context

#### National Planning Policy Framework

3.1 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. One of the three overarching objectives of the NPPF requires the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

3.2 Whilst there is no specific reference to HMOs within the NPPF, housing policies do aim to support the Government's objective of significantly boosting the supply of homes. This requires the Council to reflect on provision of the size, type and tenure of housing needed for different groups in the community, including for those who require affordable housing, students, families, and people who rent their homes. The Planning Practice Guidance echoes the content of the NPPF in that it does not provide specific advice on HMOs, however, it does provide guidance on planning for the housing needs of different groups.

### Local Policy Context

#### Coventry Local Plan

3.3 The Coventry Local Plan was adopted in 2017 and policy H11 sets out the approach below (see fig 1). The HMO DPD will ultimately sit alongside the existing Local Plan complementing existing policy but adding a suite of additional policies to address detailed issues.

*Figure 1: Coventry Local Plan, Policy H11*

#### **Policy H11: Homes in Multiple Occupation (HiMO's)**

The development of purpose built HiMO's or the conversion of existing homes or non-residential properties to large HiMO's will not be permitted in areas where the proposals would materially harm:

- a. the amenities of occupiers of nearby properties (including the provision of suitable parking provisions);
- b. the appearance or character of an area;
- c. local services; and
- d. The amenity value and living standards of future occupants of the property, having specific regard to internal space and garden/amenity space.

## **Coventry, Solihull and Warwickshire Strategic Housing Market Assessment (SHMA) 2015**

3.4 The SHMA assessments have shown that the housing market in Coventry is generally focused towards smaller, lower value properties relative to the wider housing market area and national trends. For example, 71% of all Coventry homes are within Council Tax bands A and B compared to Nuneaton where the figure is 60% and the national average is 44%. Likewise, just 10% of the city's existing housing stock is classified as detached. The Council is expecting this data to be comprehensively updated through the joint 2022 Housing and Economic Development Needs Assessment (HEDNA) later in the year. However, at present, the Council are currently planning for 24,600 additional new homes between 2011 and 2031. Any new residential schemes coming forward during this period that comprise 25 homes or 1 hectare or more will be expected to provide 25% of affordable homes<sup>1</sup>

3.5 In addition to the provision of new affordable housing, the Council was advised to investigate how better use of the existing housing stock could be made to meet housing need (recognising that the Council does not own/manage stock such investigations would need to be conducted with its stock-owning, housing association partners).

3.6 There is also a clear role for policy to seek to encourage investment and improve standards within the Private Rented Sector. The Council already has an important enforcement role and should work to develop ways to improve the housing offer for households seeking private rented homes.

### **HMO and the Planning Use Classes Order**

3.7 Planning use classes are the legal framework which determines what a particular property may be used for by its lawful occupants. The current Use Classes were last updated on 1 September 2020<sup>2</sup>. Uses are grouped into classes B, C, E, F and Sui Generis (of their own use class).

3.8 The Government defines a HMO<sup>3</sup> as:

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<sup>1</sup> [www.coventry.gov.uk/downloads/file/25899/final-local-plan-december-2017](http://www.coventry.gov.uk/downloads/file/25899/final-local-plan-december-2017)

<sup>2</sup> [www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](http://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)

<sup>3</sup> [www.gov.uk/house-in-multiple-occupation-licence](http://www.gov.uk/house-in-multiple-occupation-licence)



‘a property rented out by at least 3 people who are not from 1 ‘household’ (for example a family) but share facilities like the bathroom and kitchen. It’s sometimes called a ‘house share’.

3.9 From a planning perspective, the Use Classes Order<sup>4</sup> distinguishes between ‘small’ HMOs of up to six people (C4 use class), and ‘large’ HMOs of seven or more occupants (Sui Generis). Currently, planning permission is not needed to change the use of a house to a HMO with 3-6 residents, which is known as Permitted Development (PD). The effect of any prospective Article 4 Direction covering HMOs will be that, within any designated area, planning permission would be required for all HMO proposals (small or large).

3.10 HMOs therefore currently require planning permission once they exceed six unrelated people if that change results in a material change in use. Large HMOs, formed from seven unrelated residents or more and no PD right exists to change a HMO with 7 or more residents from any use. Consequently, for the change of use of any premises to a HMO for seven or more residents, an assessment must be made as to whether a material change of use from the prior lawful use has occurred and, if it is determined that it has, then planning permission is required.

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<sup>4</sup> [www.planninggeek.co.uk/use-class/use-class-c/](http://www.planninggeek.co.uk/use-class/use-class-c/)

## 4. HMOs in Coventry - Issues

4.1 Whilst the city's stock of HMOs is contributing to meeting local housing needs, increased numbers of multiple occupancy properties have the potential to create negative impacts. Concentrations within neighbourhoods can lead to imbalanced and unsustainable communities and can damage the residential amenity and character of surrounding areas. Harmful impacts associated with high numbers of HMOs can affect a community's health and wellbeing. Over many years across Coventry, many issues have been reported to the Council regarding the increasing numbers and concentrations of HMOs, We believe these include, but are not limited to:

- **Reduced social cohesion** resulting from the short-term nature of residencies involved with HMOs which may involve younger people overall resulting in a demographic imbalance.
- **Reduced housing choice** resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation);
- **Reduced community engagement** from residents resulting from an increase in the transient population of an area;
- **Noise and disturbance** resulting from intensification of the residential use and/or the constantly changing nature of households;
- **Overlooking and loss of privacy** resulting from poorly considered internal layouts and intensification of use;
- **Detriment to visual amenity** resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking;
- **Reduced community services** resulting from a shift in the retail/business offer towards a narrower demographic such as the proliferation of Hot Food Takeaways; and
- **Highway safety concerns** resulting from congested on-street parking and poor waste management.

4.2 A number of wards across the city have high proportions of HMOs housing a range of different groups. Non-student HMOs are generally clustered across wards in Sherbourne, Whoberley and Upper/Lower Stoke. Some communities in these areas have expressed concern over increasing numbers of HMOs and the potential for damaging impacts should numbers continue to increase without appropriate planning interventions.

4.3 The level of student population in the city is also a factor affecting the amount and distribution of HMOs. A number of residential areas have high student populations living in this form of accommodation. These areas directly surround or are accessible to the city's two universities. The issues identified above have become intensified in these locations due to high HMO numbers. Significant concentrations in particular streets and neighbourhoods have had negative impacts on local communities.

### **Key Issues in Coventry**

4.4 From the evidence gathered to date, we consider there are three key strategic issues that have emerged in Coventry and are explained below.

#### **Key Issue 1: Concentrations**

4.5 This is where issues associated with HMOs (see points above) cumulatively result in detrimental effects on the qualities and characteristics of a residential area. These qualities and characteristics are defined as generally quieter surroundings, a reasonable level of safe, accessible and convenient vehicular parking, a well-maintained or visually attractive environment and the preservation of buildings and structures that contribute to the character of a locality. It is also where the choice of housing available no longer provides for the needs of different groups within the community.



### **Key Issue 2: Sandwiching (street level)**

4.5 A harmful concentration can arise at a localised level when an existing dwelling is sandwiched between two HMOs. This can intensify impacts on individual households even if few HMOs exist locally and can create an imbalance between HMOs and other housing at a street level.

4.6 Potential sandwiching situations can include:

- Up to three single residential properties in a street located between two single HMO properties;
- Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;
- A residential flat within a sub-divided building where the majority of flats are HMOs.
- A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;
- A residential flat within a sub-divided building located between two HMO flats above and below;
- A residential flat within a sub-divided building located between two HMO flats on both sides.

4.7 Variations of these sandwiching situations may also occur. Sandwiching situations apply irrespective of limited breaks in building line, such as a vehicular or pedestrian access, apart from a separating road.

### **Key Issue 3: HMO Thresholds (ward level)**

4.8 In analysing appropriate thresholds through other Local Planning Authorities, it is clear that proposals for the introduction of new HMOs which would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the centre point of the application property is considered an appropriate level before HMO thresholds give rise to the issues outlined above.

4.9 Similarly, proposals for additional bed spaces within an existing HMO where 10% or more of the total dwelling stock is occupied as HMOs within a 100 metre radius of the centre point of the application property could also be considered an appropriate level. The 100 metre radius is given to represent the immediate neighbourhood and is measured from a centre point within the centre point of the application property as defined by the Local Land and Property Gazetteer (LLPG). Dwellings on the edge of the 100 metre radius can only be included if the

centre point, as defined by LLPG, falls within the radius. When considering applications, the Council's Development Management service will calculate the proportion of dwellings that are occupied as HMOs within any given 100 metre radius of the centre point of the application property when validating and determining such applications – please refer to Para 6.3 for further detail.



## 5. Policy Approach

5.1 With the city's growing population (and will grow further), there is a need to ensure that new development supports successful communities by ensuring the right mix of housing types in an area, securing appropriate design and supporting well managed properties. HMOs provide an important contribution to people's housing choice. The policy approach aims to ensure that such development also preserves the residential amenity and character of an area and that harmful concentrations do not arise.



5.2 Large homes in multiple occupation (HMOs) can contribute to the overall supply of cheaper accommodation, particularly for students, young people and those on low incomes. Intensive occupation of former family dwellings such as those used for student accommodation or as a HMO can have negative impacts on residential amenity within an area, through increases in

on-street and off-street parking, loss of front gardens, reductions in levels of privacy, alterations to the exterior of buildings and increased generation of refuse.

5.3 A large HMO is a property accommodating more than six unrelated persons sharing facilities and a small HMO accommodates between three and six unrelated persons. Housing legislation and the Planning Use Classes Order provides for different regulatory frameworks for managing HMOs<sup>5</sup>.

5.4 At the current time, any proposal for a small HMO is classed as permitted development. However, this DPD has been developed in parallel with a proposed Article 4 Direction which will seek to withdraw permitted development rights for small HMOs. There are significant existing concentrations of HMOs in certain wards across the city, where an Article 4 Direction will be developed (expected to be in place by 2023) removing permitted development rights for small HMO proposals (less than 6 unrelated occupants in a single dwelling).



<sup>5</sup> [www.hmohub.co.uk/planning-vs-licensing/](http://www.hmohub.co.uk/planning-vs-licensing/)

5.5 The policy approach to managing HMOs in Coventry is set out below with a suite of policies coupled with a reasoned justification. Strategic Environmental Assessment / Sustainability Appraisal of the policies has been undertaken to ensure that they are in line with national policy requirements.

**POLICY HMO1 – HOMES IN MULTIPLE OCCUPATION (HMOS)**

All proposals for the provision of HMOs will be required to demonstrate that:

- a) there is good accessibility to local amenities and public transport;
- b) they accord with the emerging Accessible Homes standards<sup>6</sup> (or future equivalent) and provide satisfactory living conditions for the intended occupiers; and
- c) there will be no demonstrably adverse impact on the amenity of neighbouring properties or the character of the area by way of character, appearance, highway safety, parking and historic assets and their setting. The proposal must also meet the criteria in policy HMO4.

**Justification**

5.6 Whilst there is an existing and corporately agreed approach to managing HMOs through the licencing regime, there is a need to strengthen existing planning policy to address HMO concentration coupled with a proposed non-immediate Article 4 Direction to withdraw permitted development rights within specific wards (expected to be in place in 2023). The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (three bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people. The cumulative effect of incremental intensification in an area caused by numerous changes of use from small HMO to large HMOs or the extension of existing HMOs can be also significant. For these reasons, applications for such changes will be assessed using the criteria in policies HMO1 and HMO4.

5.7 It should be noted that the Council intends to introduce an Article 4 Direction requiring planning permission for a change of use from family dwellings (C3) to small HMOs for between 3 and 6 unrelated people (C4 dwellings) within specified wards of the city. At the current time, eleven wards have been proposed to be included as part of the Article 4 Direction area, albeit

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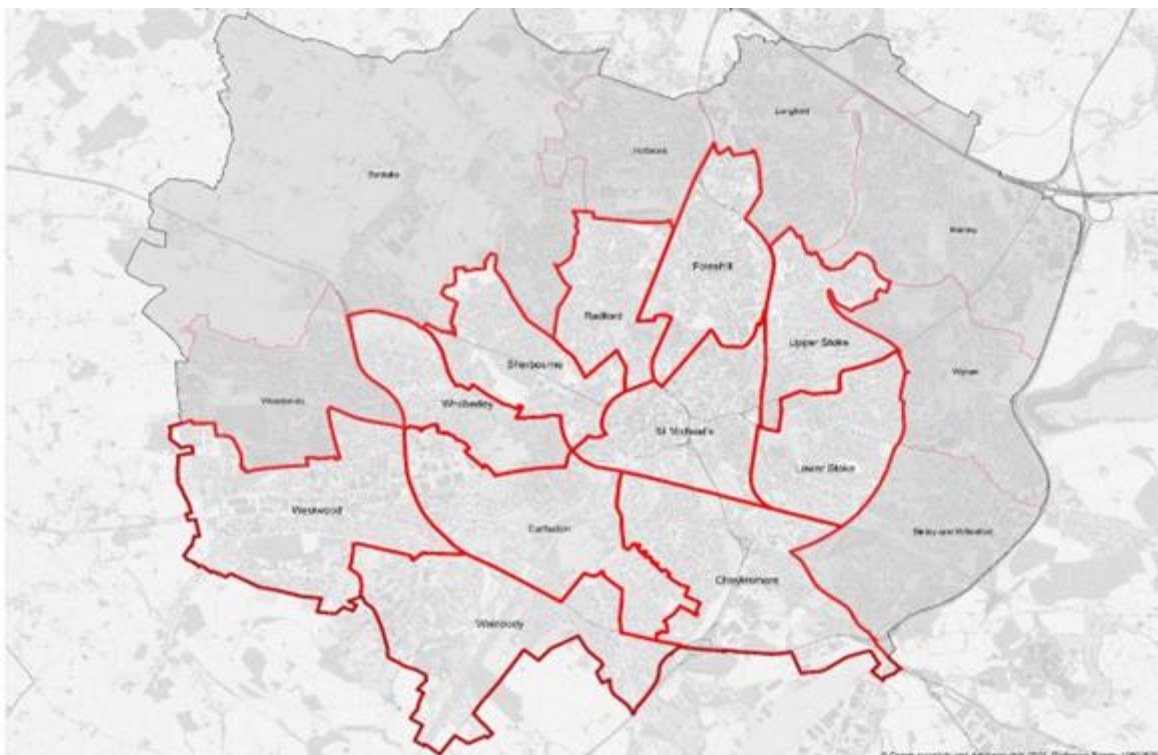
<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/930274/200813\\_con\\_doc\\_final\\_1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/930274/200813_con_doc_final_1.pdf)



they should not be considered as being the only places in the city that have a concentration of HMO dwellings. These proposed wards are:

- Cheylesmore
- Earlsdon
- Foleshill
- Lower Stoke
- Radford
- St. Michael's
- Sherbourne
- Wainbody,
- Whoberley
- Westwood
- Upper Stoke

*Please note: the Article 4 Direction was subject to a separate consultation process and is not being consulted on through this document.*



## **POLICY HMO2 – CONCENTRATIONS AND THRESHOLDS**

Where there is an existing HMO concentration of 10% or more of all dwellings within 100 metres radius of the centre point of the application property, HMO applications will not be supported. Where there is an existing HMO concentration of less than 10% within 100 metres radius of the centre point of the application property, HMO applications will be considered against the other Policies in this DPD and all other relevant policies.

### **Justification**

5.9 It is not the aim of the policy to reduce overall HMO numbers or to stop further HMO proposals coming forward, but to ensure that potentially harmful concentrations do not arise and that a high standard of accommodation and amenity is created, given the important role HMOs play as part of the city's housing offer. Clearly, patterns of supply and demand will change over time but there is a link between student shared-houses and the increasing provision of purpose-built student accommodation located in the city centre. Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining areas, displacing the concentration. Consequently, boundaries may change, and new areas may be identified. Such areas would be subject to the preferred option policy. The evidence shows that high concentrations of HMOs in the city are already having an adverse impact on the character and amenity of local areas and this issue is spreading to further areas. The NPPF encourages local planning authorities to help maintain mixed and balanced communities. Over-concentration of HMOs can cause imbalance, leading to the problems identified in section 4.

5.10 The proposed eleven wards to be included within the Article 4 Direction area have varying levels of existing HMO dwelling concentrations. However, the preferred option would apply to the city as a whole rather than at individual street level. A single threshold has been set at 10% which is considered to be a modest level based on the size and scale of the challenge this DPD is aiming to address. Moreover, research based on similar size cities across the country which have already implemented a policy intervention to address HMO challenges, also suggests that the threshold would be appropriate and reasonable. For neighbourhoods which exceed the threshold, no further applications to a C4 HMO dwelling, generated by the withdrawal of change of use permitted development rights would be permitted.

### **POLICY HMO3 – SANDWICHING**

Proposals for the provision of HMOs must not result in a non-HMO dwelling being sandwiched between two HMOs and must not lead to a continuous frontage of three or more HMOs.

Sandwiching includes:

- Up to three single residential properties in a street located between two single HMO properties;
- Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;
- A residential flat within a sub-divided building where the majority of flats are HMOs.
- A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;
- A residential flat within a sub-divided building located between two HMO flats above and below; and
- A residential flat within a sub-divided building located between two HMO flats on both sides.

### **Justification**

5.12 Preventing the “sandwiching” of a non-HMO between two HMOs or a continuous frontage of three or more HMOs is an approach that aims to prevent unacceptable adverse impacts on amenity (as set out in paragraph 4.1) and to control the location of new HMOs and student accommodation in order to prevent these uses from either exacerbating existing or creating new concentrations. It is not the intention of the policy to restrict further growth in HMOs. The Council recognises the importance of HMOs and the private rented sector generally in the housing stock but seeks to ensure that the amenity of neighbouring residents is not compromised.

### **POLICY HMO4 – AMENITY AND DESIGN**

All proposals for the provision of HMOs will be assessed against the following criteria:

- a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated;
- b) There would be no demonstrably adverse impact on the amenity of neighbouring properties and the character of the surrounding area in particular through increased activity, noise or disturbance and historic assets and their setting;
- c) The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements\* and light and ventilation;

- d) The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation;
- e) The design of external space is safe and secure, and includes provision for refuse storage, washing facilities and adequate vehicular and cycle parking<sup>7</sup>, and ensures access to outdoor amenity space;
- f) Refuse bin storage is provided externally within the curtilage of the property, within a suitably designed structure and the refuse bin not visible from the public realm; and
- g) All proposals will be expected to demonstrate how the relevant 'Secured By Design' standards have been met.<sup>8</sup>

*\* 6.51 m2 for one person over ten years of age, 10.22 m2 for two persons over ten years of age and 4.64 m2 for one child under the age of ten years. Any room of less than 4.64m2 must not be used as sleeping accommodation.<sup>9</sup>*

## **Justification**

5.14 The areas around the city centre and the campuses of both Coventry University and University of Warwick have the greatest concentrations of HMOs. These areas are popular with students and young people because they provide a good range of facilities for young people and a thriving evening economy. In addition, the housing stock lends itself well to the provision of shared houses and flats. However, one of the main problems for more settled residents living in these areas is the anti-social behaviour in the streets in the early hours of the morning. Other issues include noise from neighbouring properties, poor attendance to waste storage, increased burglaries, increased street parking, and poor property maintenance. The University and the Council work together to resolve these issues wherever possible, but the Council is firmly of the view that restricting further concentrations of HMOs will help prevent a worsening of the situation.

5.15 The policy also aims to ensure that there is satisfactory provision for the storage of waste, since a house occupied as an HMO can usually generate more waste than a family or couple. It is considered that all habitable rooms should have an adequate level of natural lighting provided via a clear glazed window or windows. Where practicable, all staircases, landings,

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<sup>7</sup> [www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031](http://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031)

<sup>8</sup> [www.securedbydesign.com](http://www.securedbydesign.com)

<sup>9</sup> Figures based on Coventry City Council's HMO licensing standards:

[www.coventry.gov.uk/downloads/file/27566/room-size-and-amenity-provision-standards](http://www.coventry.gov.uk/downloads/file/27566/room-size-and-amenity-provision-standards)

passages, kitchens, bathrooms and toilets should be provided, with a window. Windows to bathrooms and toilets should be glazed with obscured glass.

5.16 Finally, Secured by Design (SBD) and Designing Out Crime (DOC) are one of the most sustainable and cost-effective crime reduction interventions. Its is therefore sensible and appropriate for applicants to consider such standards when developing their planning application proposals.

## 6. Assessment Process

6.1 When determining planning applications for new HMOs or additional bed spaces within existing HMOs the following information should be submitted:

- Completed application form;
- Block plan of the site (at a scale of 1:100 or 1:200) showing site boundaries and any on-site car parking;
- Maximum number of occupants;
- Existing and proposed floor plans showing all room sizes (square metres), room uses and number of persons occupying each bedroom/bedsit;
- Cycle parking facilities;
- Appropriate use of acoustic and party wall insulation;
- Details of the location, layout, design, volume, management and collection arrangements for all recyclable and waste materials; and
- Details of any associated building works.

6.2 In some cases, additional information may be required to help determine the planning application. Specific examples may include, but are not limited to:

- Provision of toilets and washing facilities;
- Location(s) for food storage and cooking facilities;
- Laundry facilities and indoor/outdoor areas for clothes drying;
- Heating systems and access to hot water;
- Position of fire alarms, doors and exits;
- Building materials; and
- Security alarms, cameras and lighting.

Further information on submitting a planning application is available on the Council's website<sup>10</sup>.

### Calculations

6.3 The following approach sets out the residential properties identified for the purposes of calculating the percentage concentration of HMOs and the data sources for the purposes of identifying HMOs.

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<sup>10</sup> [www.coventry.gov.uk/planning-2/planning-application-checklist-supporting-information](http://www.coventry.gov.uk/planning-2/planning-application-checklist-supporting-information)

### Stage 1: Identifying residential properties

The residential properties identified are those located within 100m of the centre point of the application site. For the purposes of assessing applications for HMO development, dwelling houses and HMOS that are located within blocks of flats or subdivided properties are counted as one property. This will ensure that calculations of HMO concentration are not skewed.

### Stage 2: Count HMOs

HMOs are identified from the following sources:

- Properties licensed as a HMO;
- Properties with C4 or Sui Generis HMO use or issued with a Certificate of Lawful Development;
- Declared C4 HMOs recorded in the 12 month notice period for proposed Article 4 Direction, (expected to be approved in 2023); and
- Council tax records – student exemptions for council tax excluding purpose built student accommodation and private flats.

### Stage 3: Calculate concentration

The concentration of HMOs surrounding the application site is calculated as a percentage of the total estimated number of existing HMO units against the total number of residential properties. It is accepted that although the HMO sources listed above provide the most robust approach to identifying the numbers and locations of HMOs in an area, it will not identify all HMOs. Additional HMOs can also impact on residential amenity where they lead to concentrations in the immediate vicinity of an application site, as well as creating other impacts where they proliferate at a broader neighbourhood level.

Planning permission would not be granted where the introduction of a new HMO would result in an existing C3 dwelling being 'sandwiched' by any adjoining HMOs or non-family residential uses on both sides. Planning permission would not be granted where it would result in a continuous frontage of 3 or more HMOs or non-family residential uses. In situations where properties are not traditional houses situated along a street frontage, the policy can be applied flexibly depending on the individual circumstances of the proposal.





## Appendix 2: Glossary of Terms

**Article 4:** A power available under the 1995 General Development Order allowing the Council, in certain instances, to restrict permitted development rights.

**Certificate of Lawful Development:** A legal document confirming the lawfulness of past, present or future building use.

**City Centre Action Plan:** sets out a blueprint for the development of the City Centre

**Coventry Local Plan:** adopted by the Council in December 2017, it sets out the Council's vision for the city for the period 2017 -2031.

**Development Plan Document (DPDs):** A Statutory Planning Policy Document which forms part of the Local Plan, setting out Strategic Policies and Development Management Policies.

**Homes in Multiple Occupancy (HMO):** a property rented by at least 3 people who are not from 1 'household' (for example a family) but share facilities like the bathroom and kitchen. It's sometimes called a 'house share'.

**Housing and Economic Development Needs Assessment (HEDNA):** provides an assessment of the development need in order to accommodate identified housing and employment requirements.

**National Planning Policy Framework (NPPF):** outlines the Government's planning policies and expectations which directly inform local policy.

**Permitted Development Rights:** certain types of building work and changes of use that can be undertaken without the need to apply for planning permission.

**Sui Generis** – A term used to categorise buildings that do not fall into other defined use classifications, in this context it means 'in a class of its own'.

**Strategic Environmental Assessment (SEA):** a process which evaluates the environmental impacts of proposed policies.

**Strategic Housing Market Assessment (SHMA):** provides an assessment of both housing need and demand.

**Sustainability Appraisal (SA):** an assessment of the effects (social, environmental and economic) of strategies and policies contained within DPD documents.

**Use Classes Order:** puts uses of land and buildings into various categories identifiable with B, C, E, F or SG.

If you need this information in another format or language  
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**e-mail: [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk)**



**Coventry Local Plan  
Homes in Multiple Occupation (HMO)  
Development Plan Document (DPD)**

**Sustainability Appraisal (SA)  
Report**

**December 2022**

enfusion 

# Coventry Local Plan 2011-2031 Homes in Multiple Occupation (HMO) Development Plan Document (DPD) Regulation 19 Consultation Draft

## SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment)

### SA Report

date:	December 2022 v1 Draft December 2022 v2 Final	
prepared for:	Coventry City Council	
prepared by:	Barbara Carroll	Enfusion
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## **Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment): NON-TECHNICAL SUMMARY (NTS)**

### **This is the NTS of the Sustainability Appraisal (SA) Report**

1. This is the NTS of the SA Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Coventry Homes in Multiple Occupation (HMO) Development Plan Document (DPD). This summary is an integral part of the SA Report that accompanies the draft DPD for public consultation in early 2023. It provides an outline of the SA process and findings, including how the SA has influenced the development of the draft Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

### **The Coventry Local Plan 2031 & Homes in Multiple Occupation (HMO) Development Planning Document (DPD)**

2. The Coventry Local Plan 2011-2031 and City Centre Area Action Plan 2011-2031 (CCAAP) (both adopted 2017), together with the NPPF, DPDs, Supplementary Planning Guidance (SPDs), and Neighbourhood Plans, comprise the planning framework through which decisions are made on planning applications. The HMO DPD when adopted will be part of this framework and it will have to be in conformity with the Coventry Local Plan. Policy H11 of the Local Plan focuses upon HMOs. The Coventry Local Plan covers the entire administrative boundary for Coventry City Council and this extends beyond the city centre boundary.
3. A Home in Multiple Occupation is defined as a property rented to at least 3 people who are not from one household (such as a family) but share facilities such as a bathroom and a kitchen. With the city's growing population, there has been a growth in the rented sectors, and thus there is a need to ensure that new development supports communities by ensuring a balanced mix of housing types. The increasing concentration of HMOs have resulted in negative impacts for amenity and character of areas, reduced social cohesion, noise and nuisance disturbance, and highway safety concerns with poor parking and waste management. Therefore, the Council considers that there needs to be such further planning guidance to support the CLP Policy H11 now and ahead of the CLP Review that is ongoing now.
4. The Coventry HMO DPD is comprised, as follows:
  - Summary
  - Introduction

- Policy Context
  - HMOs in Coventry – Issues
  - Policies –
    - HMO1 Homes in Multiple Occupation
    - HMO2 Concentrations & Thresholds
    - HMO3 Sandwiching
    - HMO4 Amenity & Design
  - Assessment Process
- Appendix I Concentration of Existing HMOs, 2022

### **Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)**

5. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social, and economic considerations in the preparation of Local Plan Documents (DPDs). This requirement for SA is in accordance with planning legislation and paragraph 32 of the National Planning Policy Framework. DPDs must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
6. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK planning guidance suggests a staged approach to SA/SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope of the SA is prepared and includes a SA Framework of objectives for sustainable development relevant to the Coventry local authority area and the issues for HMOs, and which forms the basis against which the draft DPD is assessed.
7. Local Plan Documents must also be subject to Habitats Regulations Assessment (HRA). The Habitats Regulations (amended 2018) afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar sites. It is a requirement to consider if the plan is likely to have significant effects on any relevant designated site. HRA is a two staged process – screening, and then appropriate assessment (if significant adverse effects are screened as likely).
8. An updated HRA screening (April 2022) was undertaken in respect of the emerging HMO DPD. This concluded that there would be no likely significant effects (LSEs) on the integrity of identified nearby designated sites, alone or in combination. During the consultation of the SA scoping and HRA screening, Natural England advised that they agreed with the conclusions reached.

## Sustainability Characteristics of the Coventry City Area & Likely Evolution without the DPD

9. There are no internationally designated sites (SPAs or Ramsar) within a 20 km radius of the Coventry DPD area. There is one isolated Special Area of Conservation (SAC) – Ensor’s Pool – and the HRA concluded that there would be no likely significant effects from the DPD. The area contains two Sites of Special Scientific Interest (SSSIs), 16 Local Nature Reserves (LNRs), and 21 designated areas of ancient woodland.
10. There is no nationally designated landscape (AONB) but the landscapes in the area are valued for their scenic qualities, rich wildlife, cultural associations and historic values. The area has a rich historic and cultural heritage. Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Coventry has over 400 Listed Buildings of national importance, 16 Conservation Areas, 20 Scheduled Monuments, 4 Registered Parks and Gardens, and many other sites and features of historic interest. Coventry has a lot of older housing stock, some of which may become HMOs and the need to consider the historic assets and their settings is important, including resilience to climate change.
11. Air quality and traffic congestion remain issues, especially associated with the main transport corridors to the north and north-east (linked to M6). Coventry was one of the first cities to produce a Climate Change Strategy in 2012 with a target to reduce carbon dioxide emissions by 27.5% by the year 2020. Coventry achieved this in 2014 – six years early. The Strategy is currently under review and will set targets to reflect the current urgency of the climate crisis that is recognised by the City Council. Overcrowding from intensification of HMOs with on-site/off-site increased parking can lead to concerns about highway safety, noise, disturbance and air quality.
12. The total population of Coventry City Council (2020) was 379,387 of which 193,290 was male and 186,097 was female with 72,983 under age 16, 62,108 aged 16-24, and 193,833 aged 25-64. This illustrates a high number of young people aged 20-24. The Index Of Multiple Deprivation data (2019) for Coventry City indicate a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west.
13. Whilst the city’s stock of HMOs is contributing to meeting local housing needs, increased numbers of multiple occupancy properties have the potential to create negative impacts. Over years across the Coventry area, many issues have been reported to the Council, including concern about the increasing numbers and concentrations of HMOs and their effects on reduced social cohesion, reduced housing choice, reduced community engagement with a more transient population, and overlooking with loss of privacy – all of which can affect health and wellbeing of residents.
14. Concerns have been raised about intensification of HMOs and detriment to visual amenity resulting from poor waste management, poor property



maintenance, accumulative external alterations to properties, and use of frontage areas for off-street parking. Noise and disturbance resulting from intensification of residential use and/or constantly changing nature of households is an issue. There are concerns about detriment to visual amenity and potentially health/wellbeing resulting from poor waste management. Also, risks to highway safety through accumulation of poorly stored waste on the pavement or roadside.

15. The HMO DPD is focused on a specific topic – HMOs - and, therefore, it is somewhat limited in its scale and sphere of influence with regard to likely significant effects. Many sustainability factors are not relevant and the SA focused on the baseline characterisation, key issues and opportunities that were directly relevant to the HMO DPD.
16. Without the Coventry HMO DPD to guide and manage such development proposals in an integrated and holistic way, the current problems and issues associated with HMOs that have been reported to the Council are likely to get exacerbated. This particularly relates to the intensification of HMOs in certain areas and the cumulative negative effects that are likely to increase – noise and disturbance, loss of amenity, anti-social behaviour and social isolation, highway safety, and poor waste management – and all these factors can have adverse effects on communities and residents' wellbeing.

### **Key Sustainability Issues and Opportunities**

17. The Council remains committed to meeting the local identified need for housing with a mix of tenures, appropriate distribution of affordable housing, and appropriate densities for local character, student accommodation, and houses in multiple occupation. Other key relevant sustainability issues may be summarised, as follows:

- Enabling vibrant and inclusive communities
- Improving health and reducing health inequalities
- Enable good quality HMOs that provide satisfactory housing for local needs & that do not intensify nor cause adverse impacts on local residents & their environment
- Protect and enhance the local townscape characters & amenity/visual values
- Protect and enhance the historic environment and its setting
- Promote and support more sustainable transport
- Promote safe sustainable waste management

### **How has the Coventry HMO DPD been assessed?**

18. The SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

SA Objective
No 1: Improve accessibility to and use of basic services and amenities to all residents
No 2: Enable vibrant and inclusive communities that participate in decision-making
No 3: Reduce social exclusion and poverty
No 4: Improve health, reduce health inequalities and promote active living
No 5: Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs
No 6: To reduce crime, disorder and fear of crime
No 7: To encourage increased cultural and recreational activities across all sectors of the community
No 8: To protect and enhance landscapes, local countryside, open spaces and the historic environment, and the setting of heritage assets
No 9: To protect and enhance biodiversity <i>Scoped out</i>
No 10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments
No 11: Enhance quality and minimise air, soil, water, light and noise pollution levels
No 12: Minimise and manage the risk of flooding and the impacts of climate change <i>Scoped out</i>
No 13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources
No 14: To minimise use of water, minerals and other natural resources
No 15: To reduce travel by car and air
No 16: To reduce pollution and waste generation and increase levels of reuse and recycling
No 17: To meet local needs locally
No 18: To improve Coventry's economy through developing a successful and diverse modern economy <i>Scoped out</i>
No 19: To ensure access to good quality employment opportunities for all <i>Scoped out</i>
No 20: Good education and training opportunities for all <i>Scoped out</i>

19. The SA Framework was originally developed as part of the SA process that investigated the emerging Coventry Local Plan during 2015-2017. The basis for the assessment of the HMO DPD was the same framework of objectives to ensure consistency and continuity. The updated SA scoping identified that some SA Objectives were not relevant for testing the HMO DPD and these were scoped out of the assessment. SA No 8 was strengthened for consideration of the historic environment and its setting. The categories of significance used with SA Framework are as set out in the key below:

	Description & Significance of Effect
<b>++</b>	Major Positive
<b>+</b>	Minor Positive
<b>0</b>	Neutral/no impact
<b>-</b>	Minor Negative
<b>--</b>	Major Negative

?	Uncertain
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20. Each of the four draft HMO Policies was assessed using the SA objectives with professional judgment and the baseline information. Then the DPD as a whole was considered and including cumulative effects, where possible, and noting interrelationships.

### **What reasonable alternatives have been considered & addressed?**

21. The Council does have the option of not preparing an HMO DPD and continuing with reliance on the existing CLP Policy H11 and this do-nothing option was tested through SA. The purpose of preparing an HMO DPD is to address issues that have arisen (associated with visual amenity, traffic and parking, waste, noise and disturbance, anti-social behaviour, weakening of community ties, pressures on services, and reduced housing affordability and choice) and that are likely to exacerbate if some action is not taken.
22. During the Regulation 18 consultation on the Issues & Preferred Option draft of the HMO DPD, several residents expressed concern about the proposed concentration of 10% or more of all dwellings and within 100m radius of the centre point of the application property – where there is an existing HMO concentration, applications will not be supported. Residents were concerned that this may not reflect the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing. Some residents suggested that the Council should consider different concentrations and different thresholds, and for example, suggested 5% and 750m radius.
23. The Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. However, as some residents have raised their concern, the Council agreed to test the options of a 5% concentration and a 750 radius from the mid-point of any existing HMO through SA. The SA found that reducing the concentration threshold to 5% existing HMOs would reduce further negative effects on amenity topics but might risk restricting the number of HMOs supported and progressed with issues for meeting the need for this kind of housing. Extending the radius distance to 750m could risk continued accumulation of HMOs and possible negative effects for amenity and community factors.
24. Research based on similar sized cities already implementing an HMO policy indicates that this threshold is appropriate and reasonable. High concentrations of HMOs are already having an adverse impact on character and amenity in Coventry, and the Council aims to help maintain mixed and balanced communities. Therefore, the Council continues to consider that the proposed threshold and concentration of 10% and 100m is suitable and deliverable; it does not restrict the progress of HMO delivery and it provides mitigation to reduce the cumulative negative effects for amenity and communities. Each HMO application will be considered on a case by case approach, and this will include the consideration of the characteristics of

different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing.

### **What are the likely significant effects of the draft DPD? How has the SA influenced the draft DPD?**

25. Overall, the implementation of the Homes in Multiple Occupation DPD is likely to have positive effects for housing, balanced communities, and health and wellbeing. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character. The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented. This will resolve existing sustainability problems, and avoid exacerbation of further cumulative negative effects such that overall positive effects are indicated. There were no significant negative effects identified.
26. The DPD has recognised where there could be certain negative effects arising, particularly from the intensification of HMOs. The Council has ensured that there are additional mitigation measures within the four HMO policies to support and/or strengthen the policies in the adopted Local Plan. The SA found that there was strong mitigation provided through HMO policy requirements to mitigate potential negative effects for amenity and character of Coventry areas. This included consideration of avoiding/reducing likely cumulative effects for social isolation, anti-social behaviour, amenity and visual impacts, poor air quality and traffic/parking, nuisance noise, and poor waste management.

### **How could negative effects be mitigated?**

27. The SA did not identify any significant negative effects from the implementation of the DPD and that would need mitigation.

### **Were there any difficulties encountered?**

28. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties, particularly with regard to climate change and longer-term effects, for example in predicting the likely future baseline, and assumptions were made using professional judgment.

### **Consultation**

29. The proposed scope of the SA was consulted on in September-November 2022 with the statutory bodies (Historic England, Environment Agency, and Natural England) and comments received by HE and NE have been taken into account in developing the DPD and the SA. This SA Report accompanies the draft Coventry HMO DPD for wider consultation with stakeholders and the public in early 2023. The draft DPD and supporting evidence, including the SA

Report and any comments on it, will be sent to the Secretary of State for independent examination by a Planning Inspector.

### **Monitoring Proposals**

30. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. The Coventry monitoring strategy for the Local Plan is considered satisfactory for the requirements from the SA process.

## 1.0 INTRODUCTION

### Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

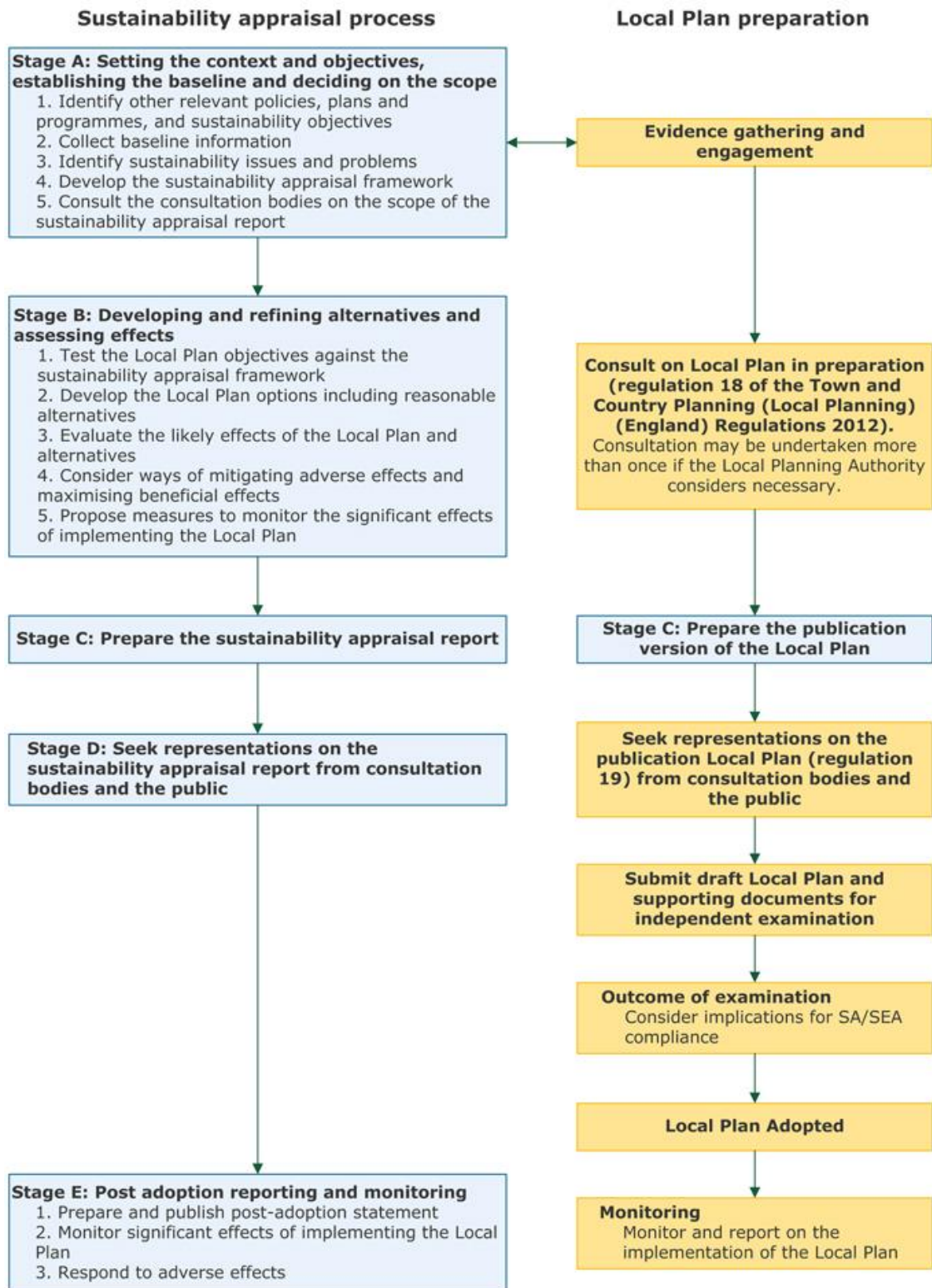
- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives<sup>1</sup>.
- 1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF, updated 2021)<sup>2</sup>. SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup>. Coventry City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Coventry Homes in Multiple Occupation (HMO) Development Plan Document (DPD).
- 1.3 National planning practice guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. These key stages and tasks are applicable to the SA process for Coventry HMO DPD. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.
- 1.4 National Planning Practice Guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses. The role of the SA is to inform the plan-making process.
- 1.5 This SA Report explains the Stage A Scoping that was completed earlier and sent to the statutory consultation bodies in accordance with good practice. It reports the findings of Stage B Alternatives & Assessment and comprises Stage C Preparation of the SA Report. This SA Report accompanies the Coventry Homes in Multiple Occupation DPD on public consultation for Stage D and seeks comments from the public and the statutory consultees.

<sup>1</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

<sup>2</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>3</sup> <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

Figure 1.1: SA and Plan-making Stages and Tasks



## Habitats Regulations Assessment (HRA)

- 1.6 Local Plan Documents must also be subject to Habitats Regulations Assessment (HRA)<sup>4</sup>. The Conservation of Habitats & Species Regulations (2017, amended 2018)<sup>5</sup> afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar<sup>6</sup> sites. It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site. HRA is a two staged process – initially screening and then appropriate assessment (if significant adverse effects are screened as likely). Planning practice guidance advises that an SA should take account of the findings of an appropriate assessment, if one is undertaken.
- 1.7 The updated HRA screening (April 2022) for a plan in the Coventry City Council area found that the findings from the previous HRA screenings of the Coventry Local Plan and City Centre AAP remain valid and relevant in the light of recent case law and changes to HRA practice. The HMO DPD is limited in its scale and scope. Overall, this HRA screening concluded that there would be no likely significant effects (LSEs) on the integrity of identified nearby designated sites, alone or in-combination. During the consultation of the SA scoping and HRA screening, Natural England advised that they agreed with the conclusions reached.

## The Coventry Local Plan (CLP) and the Homes in Multiple Occupation (HMO) Development Plan Document (DPD)

- 1.8 The Coventry Local Plan 2011-2031 and City Centre Area Action Plan 2011-2031 (CCAAP) (both adopted 2017), together with the NPPF, DPDs, Supplementary Planning Guidance, and Neighbourhood Plans, comprise the planning framework through which decisions are made on planning applications. The HMO DPD when adopted will be part of this framework and it will have to be in conformity with the Coventry Local Plan. Policy H11 of the Local Plan focuses upon HMOs. The Coventry Local Plan covers the entire administrative boundary for Coventry City Council. The remit of the plan extends beyond the City Centre boundary to cover an area of 99km<sup>2</sup> located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa.
- 1.9 The focus for the DPD is on homes in multiple occupation and is being produced in tandem with an Article 4 Direction that will remove Permitted Development Rights in relation to HMOs. HMOs are properties rented to at least 3 people who are not from one household, such as a family, but share facilities like a bathroom or kitchen. Currently, planning permission is not needed to change the use of a house to an HMO with 3-5 residents. Although the Council has now commenced the review of its Local Plan, it wishes to produce a stand-alone HMO DPD as it is facing particular issues with HMOs

<sup>4</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>5</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

<sup>6</sup> Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance



that need to be addressed to a faster timescale than would be achievable with local plan review. An HMO DPD will provide the policy basis to support the Article 4 direction but will also bring forward the review of Policy H11 in advance of the local plan review.

- 1.10 HMOs can cause significant issues for neighbours and the wider community including general anti-social behaviour, weakening of community cohesion, noise, disturbance, and waste management. However, HMOs also provide a significant element towards meeting the city's housing needs. HMOs can provide an affordable housing option for young professionals and graduates and a first foot on the housing ladder for many of the city's young people in general.
- 1.11 During their preparation, the emerging Coventry Local Plan and the City Centre Area Action Plan were subject to SA<sup>7</sup> and HRA.
- 1.12 The Coventry HMO DPF comprises an introduction that explains the context for the plan and how it aims to provide a policy approach to HMOs, housing diversity, residential amenity and parking standards in order to ensure that the new HMO developments meet other policy requirements to mitigate any adverse impacts on the surrounding areas. It also explains the role of the HMO licensing regime which is a separate process that can relate to both HMOs which do, and do not, require planning permission. The Article 4 Direction is subject to a separate consultation process.
- 1.13 The DPD sets out the planning policy context, including CLP Policy H11, and the Planning Use Classes Order. Chapter 4 explains the issues for Coventry and HMOs. Chapter 5 presents the 4 Policies, as follows:

**Policy HMO1 Homes in Multiple Occupation (HMOs):** Proposals are required to demonstrate good accessibility, accord with the emerging Accessible Homes standard, and will not have adverse impacts on amenity or character

**Policy HMO2 Concentrations & Thresholds:** Where there is an existing HMO concentration of 10% or more dwellings within 100m radius of the centre point of the application property, HMO applications will not be supported.

**Policy HMO3 Sandwiching:** Requires that provision of HMOs must not result in a non-HMO dwelling being sandwiched between two HMOs.

**Policy HMO4 Amenity & Design:** Provides six criteria (a) – (f) against which proposals will be assessed.

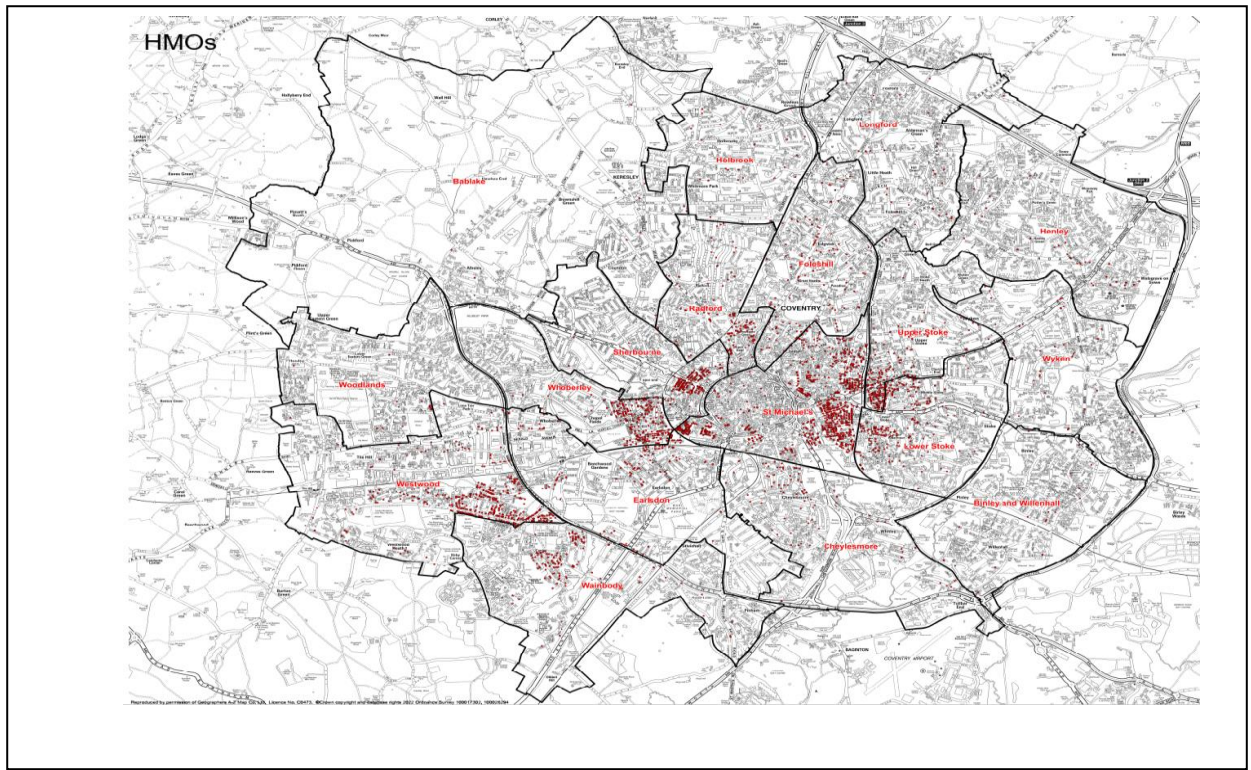
- 1.14 Chapter 6 explains the proposed assessment process for determining planning applications for new HMOs or additional bed spaces within existing HMOs. It sets out a 3-staged process for calculating the percentage concentration of HMOs. Exceptional circumstances are acknowledged and this is explained at the end of the chapter. The boundary of the HMO DPD

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<sup>7</sup> <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/3>

and the locations of HMOs in the Coventry area are shown in Figure 1.2, as follows:

**Figure 1.2:** Locations of HMOs in Coventry & DPD boundary



## Consultation

- 1.15 The statutory environmental consultation bodies – Environment Agency, Historic England, Natural England - were consulted upon the SA/SEA & HRA scoping and screening report (April 2022). The Regulation 18 Issues & Preferred Option draft HMO DPD was subject to public consultation from 20 September 2022 to 15 November 2022. The SA scoping & HRA screening report was also available for comment; all documents were placed on the Council's website<sup>8</sup> for comment. Comments received from the environmental bodies were taken into account to finalise the SA Scoping Report (December 2022).
- 1.16 Comments received on the HMO Issues & Preferred Option draft DPD (July 2022) were taken into account to prepare the next draft of the DPD for Regulation 19 consultation. The SA of the emerging draft DPD has informed the ongoing development of the plan in an iterative manner and the SA findings are presented in this SA Report (December 2022). SA Reports accompany the stages of the plan as set out in the following Table 1.1 with the chronology of the plan preparation, consultation and the accompanying SA/SEA stages:

<sup>8</sup> <https://coventrycitycouncil.inconsult.uk/HMO/consultationHome>

**Table 1.1: Coventry HMO DPD with SA/SEA Stages and Documents**

<b>Coventry HMO DPD Stage and Documents Consultation</b>	<b>SA/SEA Stage and Documents Consultation</b>
<b>Evidence Gathering &amp; Technical Studies</b> 2022	
<b>Issues &amp; Preferred Option</b> (July 2022) Regulation 18 Consultation: 20 September 2022 to 15 November 2022	<b>SA/SEA Scoping Report &amp; HRA Screening Report</b> (April 2022) Consultation: 20 September – 15 November 2022) Final SA/SEA Scoping Report (December 2022)
<b>Pre-Submission HMO Development Plan Document</b> Regulation 19 Consultation: Early 2023	<b>Pre-Submission SA Report</b> (December 2022) Consultation: Early 2023
<b>Submission &amp; Examination</b> To be confirmed later 2023	<b>Submission &amp; Examination</b> To be confirmed later 2023
<b>Local Plan Adoption</b>	<b>SA Adoption Statement</b>

- 1.17 Coventry City Council is publishing the draft Regulation 19 HMO DPD together with this SA Report for statutory and wider public consultation. Any comments on the draft DPD and SA will be taken into account at the next stages of plan-making – submission to the Secretary of State and independent examination. In 2022, independent specialist consultants at Enfusion Ltd were commissioned by Coventry Council to undertake the SA/SEA.

### **Compliance with the Requirements of the EU SEA Directive**

- 1.18 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. This SA Report presents the SA/SEA testing of the emerging new Local Plan and includes a Non-Technical Summary and an appendix that clearly signposts the requirements for reporting the SEA.

### **Purpose and Structure of this SA Report**

- 1.19 This document reports the SA/SEA process for the Coventry HMO DPD. This SA draws upon the earlier SA work, updating and building upon the previous SA/SEA/HRA of the adopted Local Plan for consistency and correlation, particularly with regard to the scoping stage. This is in consideration of the limited scope and scale of the likely proposed development to be determined through the HMO DPD, and the position of the DPD in the planning policy hierarchy.

- 1.20 Following this introductory Section 1, this report is structured into further sections:
- Section 2 describes the approach and methods used to appraise the emerging elements of the Plan; explains how options in plan-making and alternatives in SA/SEA have been addressed and reported explicitly to demonstrate compliance with the requirements of the EU SEA Directive
  - Section 3 summarises the sustainability context and characteristics with details available in the Final SA Scoping Report (December 2022) available on the Council's website
  - Section 4 summarises the findings of the SA of the draft Policies HMO1-4 and the DPD as a whole
  - Section 5 introduces the approach to monitoring and the SA
  - Section 6 provides summary conclusions from the SA, sets out the requirements for consultation and commenting on the report, and explains the next steps
- 1.21 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA/SEA are located in the SA Report. Appendix II is the SA Scoping Report (available separately) and including the details of the baseline evidence and the development of the SA Frameworks for assessment. Representations to consultations and responses made are reported in Appendix III. Appendix IV details the appraisal of the options for thresholds and concentrations. Appendix V details the appraisal of the 4 HMO Policies, against the full SA framework of objectives for sustainable development.

## 2.0 APPROACH & METHOD

### The SA/SEA Process & Approach Taken

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Coventry Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned to the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of appraisal/assessment processes that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (2022) in paragraph 35b that states that evidence should be proportionate. Planning guidance advises<sup>9</sup> that the SA should focus on what it needed to assess the likely significant effects of the plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the plan .

### Scoping & the SA Framework

- 2.3 The SA scoping for the HMO DPD took a proportionate and pragmatic approach as the DPD is limited in its scale and sphere of influence, and in consideration of the position of the DPD in the planning policy hierarchy. The DPD relates to one CLP Policy H11 and aims to expand upon this by developing further, more detailed policies that seek to address specific issues. The previous SA framework remains valid and robust, and was proposed to retain it for the SA of the HMO DPD for consistency with the assessments of the other plans in the Coventry planning framework.
- 2.4 Through the scoping process, the relevant policy context was reviewed, and baseline information was identified, collated and analysed to ensure that key issues and opportunities for the Coventry LP area and relevant for HMOs were identified. The details of this analysis are presented in final SA Scoping Report (December 2022) and a summary is provided in the following Section 3 of this SA Report.
- 2.5 The SA Framework provides the basis by which the sustainability effects of the HMO DPD are described, evaluated and any options compared. It includes a number of objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan and DPD, and sustainable

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<sup>9</sup> <https://www.gov.uk/guidance/environmental-impact-assessment>

development in the Coventry area. These objectives have been identified through the SA Scoping Stage from the information collated in the policy context, baseline analysis, and identification of sustainability issues. Thus, the SA draws upon the earlier SA work, updating and building upon the previous SA/SEA/HRA of the adopted Local Plan for consistency and correlation.

- 2.6 The proposed scope and method of assessment were consulted upon with the statutory environmental bodies. No comment was received at this stage from the Environment Agency. Natural England commented that they agreed with the conclusions reached. Historic England (HE) welcomed the retention of SA Objectives No 8 Landscape & Historic Environment, and suggested that “*and the setting of heritage assets*” should be included. HE also suggested inclusion of an additional sub-objective for SA No 13 Energy “improve energy efficiency of historic buildings” – both these suggestions have been included into the SA Framework. HE also explained the importance of understanding the effects of climate change on the historic environment and suggested certain recent documents from HE that would be helpful for the assessment. Overall, HE considered that the amendments to the scope of the SA for Coventry City Council's HMO DPD, as set out above, are necessary to ensure that it meets the requirements of the Directive and Legislation in relation to heritage.

### SA Framework

- 2.7 The use of an SA Framework of objectives is an established method through which the sustainability and environmental effects of a plan can be described and assessed. The SA Framework was originally developed by Coventry City Council from the analysis of policy objectives, baseline information, and key sustainability issues and opportunities identified in the Local Plan area. Each SA objective was further clarified through a number of sub-objectives to aid the appraisal process and aligned with indicators for monitoring purposes. The draft SA Scoping report was formally consulted upon in compliance with the SEA Regulations and the final SA Scoping Report published in 2015. The SA framework was used to assess the emerging Local Plan and City Centre Area Action Plan.
- 2.8 For the SA of the HMO DPD, a number of SA Objectives were found to be not relevant and/or not likely to have any significant effects through the updated scoping process, and as such, have been scoped out of the process. The SA framework of sustainability objectives and decision-aiding sub-objectives/questions to assist the appraisal is, as follows:

**Table 2.1 SA Framework**

SA Objective	Sub-objective (will it...)
SA No 1: <b>Improve accessibility to and use of basic services and amenities to all residents.</b>	Make access more affordable? Improve accessibility to local services? Ease access for those without car?
SA No 2:	Encourage community participation in activities

<b>Enable vibrant and inclusive communities that participate in decision-making</b>	and/or in the democratic process? Devolve decision-making to communities (where appropriate)? Improve and increase community facilities? Reduce the potential for social isolation with particular regard to potentially disadvantaged groups?
SA No 3: <b>Reduce social exclusion and poverty</b>	Reduce poverty and social exclusion in those areas most affected? Lower dependence on welfare benefits? Increase wage levels for both man and woman
SA No 4: <b>Improve health, reduce health inequalities and promote active living</b>	Improve equitable access to high quality health services? Promote positive health and prevent ill health? Address health inequalities? Encourage healthy and active lifestyles? Create a smoke free Coventry
SA No 5: <b>Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs</b>	Make housing available to people in need? Improve the quality of housing stock? Reduce the number of vacant properties? Increase the use of sustainable building practices? Reduce homelessness? Meet the housing needs of the travellers and gypsy communities?
SA No 6: <b>To reduce crime, disorder and fear of crime</b>	Reduce actual levels of crime? Promote design that discourages crime? Address the cause of disorder and crime and/or reduce crime through intervention? Reduce fear of crime?
SA No 7: <b>To encourage increased cultural and recreational activities across all sectors of the community</b>	Increase availability and accessibility of culture, leisure and recreation (CLR) activities/venues? Provide support for CLR providers and/or creative industries? Preserve, promote and enhance culture and heritage in the City?
SA No 8: <b>To protect and enhance landscapes, local countryside, open spaces and the historic environment, and the setting of heritage assets</b>	Protect and enhance features, area and landscape of historical and cultural value? Promote sensitive re-use of historic or culturally important buildings where appropriate (listed and non listed)? Provide for increased access to, and understanding of the historic environment? Conserve the character of historic settlements and conservation areas? Preserve and where appropriate enhance features of archaeological importance? Promote heritage-led regeneration?
SA No 9: <b>To protect and enhance biodiversity</b>	Scoped out
SA No 10: <b>Promote a high quality built environment by improving design and layout and</b>	Promote the design of buildings on a human scale, encouraging walking and cycling? Promote the development of communities with accessible services, employment, shops and leisure facilities?

<b>encourage local distinctiveness and stewardship of local environments</b>	Ensure high design quality, which supports local distinctiveness? Encourage re-use of existing buildings?
SA No 11: <b>Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	Clean up contaminated land? Maintain and/or improve air quality? Maintain and/or improve surface water and groundwater quality? Maintain and where possible improve soil quality and minimise the loss of soils to development? Raise awareness about pollution and its effects? Reduce pollution from Air travel?
SA No 12: <b>Minimise and manage the risk of flooding and the impacts of climate change</b>	Scoped out
SA No 13: <b>To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	Increase the amount of energy from renewable sources that is generated and consumed in the region? Reduce the energy consumption? Reduce greenhouse gas emissions, particularly CO2 and methane? Increase energy efficiency in all sectors? Improve energy efficiency of historic buildings?
SA No 14: <b>To minimise use of water, minerals and other natural resources</b>	Increase efficiency in water, energy and raw material use? Make efficient use of land (appropriate density, protect good agricultural land, use brownfield land in preference to Greenfield sites)? Increase awareness and provide information on resource efficiency and waste? Reduce use of non-renewable resources?
SA No 15: <b>To reduce travel by car and air</b>	Improve access to opportunities and key resources and services for all groups by means other than the car (e.g. health, education, work and food shopping)? Ensure new developments provide essential services accessible without use of a car and are accessible by public transport? Ease congestion on the road/rail network? Make the transport/environment attractive to non-car users (e.g. pedestrians and cyclists)? Encourage freight transfer from road to rail? Provide integrated transport services? Increase provision of public transport where needed? Improve rail services and facilities? Reduce environmental impacts of traffic
SA No 16: <b>To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Lead to reduce consumption of materials and resources? Minimise waste production? Increase waste reuse or recycling?
SA No 17:	Ensure that everyone has access to essential



<b>To meet local needs locally</b>	services (e.g. employment, education, health services and shops) and resources to serve communities are within reasonable non-car based travelling distance? Provide appropriate housing for local needs? Support the vibrancy of town and village centres? Investigate information/communication technology (ICT) links to connect geographically remote and disadvantaged groups to services and resources?
SA No 18: <b>To improve Coventry's economy through developing a successful and diverse modern economy</b>	Scoped out
SA No 19: <b>To ensure access to good quality employment opportunities for all</b>	Scoped out
SA No 20: <b>Good education and training opportunities for all</b>	Scoped out

2.9 The categories of significance used with SA Framework are as set out in the key below:

**Table 2.2: Significance Key**

	Description & Significance of Effect
<b>++</b>	Major Positive
<b>+</b>	Minor Positive
<b>0</b>	Neutral/no impact
<b>-</b>	Minor Negative
<b>--</b>	Major Negative
<b>?</b>	Uncertain <sup>10</sup>

### Assessing the draft DPD

2.10 Each emerging element of the DPD was appraised against the SA Framework of objectives using professional judgment and in consideration of the baseline conditions. The nature of the likely sustainability effects (including major/minor, positive/negative, duration (short, medium or long term),

<sup>10</sup> There can be uncertainties during appraisal, especially when considering topics such as climate change, and cumulative effects

permanent/ temporary, secondary<sup>11</sup>, cumulative<sup>12</sup> and synergistic<sup>13</sup>) were described in the appraisal commentary, together with any assumptions or uncertainties. Where necessary, the SA made suggestions to mitigate negative effects or promote opportunities for enhancement of positive or neutral effects. SA is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects, particularly at a strategic level of assessment.

- 2.11 The original SA numbering of objectives was retained to demonstrate consistency with the earlier SA of the CLP. During assessment, the findings for SA No 8 were divided into two topics – landscape/open spaces and the historic environment. Since the development of the original SA framework in 2015, the importance of these topics has been enhanced and requirements in the NPPF are more explicit such that it was considered that they need to be addressed separately.
- 2.12 Each draft HMO Policy was assessed using the SA objectives. Then the DPD as a whole was considered and including cumulative effects, where possible, and interrelationships.

### Consideration of Alternatives

- 2.13 The SEA Regulations require that the SEA should consider the effects of “reasonable alternatives”. Planning Policy Guidance<sup>14</sup> advises that the SA “needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.” “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”
- 2.14 The Council does have the option of not preparing an HMO DPD and continuing with reliance on the existing CLP Policy H11 and this do-nothing option was tested through SA. The purpose of preparing an HMO DPD is to address issues that have arisen (associated with visual amenity, traffic and parking, waste, noise and disturbance, anti-social behaviour, weakening of community ties, pressures on services, and reduced housing affordability and choice) and that are likely to exacerbate if some action is not taken.
- 2.15 During the Regulation 18 consultation on the Issues & Preferred Option draft of the HMO DPD, several residents expressed concern about the proposed concentration of 10% or more of all dwellings and within 100m radius of the

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<sup>11</sup> Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

<sup>12</sup> Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

<sup>13</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

<sup>14</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

centre point of the application property – where there is an existing HMO concentration, applications will not be supported. Residents are concerned that this may not reflect the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing. Some residents suggested that the Council should consider different concentrations and different thresholds, and for example, suggested 5% and 750m radius.

- 2.16 The Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. Research based on similar sized cities already implementing an HMO policy indicates that this threshold is appropriate and reasonable. Therefore, the Council did not consider that there were any other realistic options that needed testing through SA. However, as some residents have raised their concern, the Council agreed to test the options of a 5% concentration and a 750 radius from the mid-point of any existing HMO through SA.

## 3.0 SUSTAINABILITY CONTEXT & SUMMARY BASELINE CHARACTERISATION

### Policy Context

- 3.1 The HMO DPD, when adopted, will be part of the Coventry Local Plan 2031 (adopted 2017) and as such, proposals for HMOs will need to be compliance with other policies in the Local Plan, as well as national planning policies and guidance.

### Communities, Housing, Services/Facilities, & Health

- 3.2 The total population of Coventry City Council (2020)<sup>15</sup> was 379,387 of which 193,290 was male and 186,097 was female with 72,983 under age 16, 62,108 aged 16-24, and 193,833 aged 25-64. This illustrates a high number of young people aged 20-24. Coventry City Council (2020)<sup>16</sup> information reports that Healthy Life Expectancy (HLE) at birth is 64.2 for females and 61.9 years for males and this compares to national data of 63.5 for females and 63.2 years for males.
- 3.3 The Index of Multiple Deprivation (IMD) data (2019)<sup>17</sup> for Coventry City indicate a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west.
- 3.4 Whilst the city's stock of HMOs is contributing to meeting local housing needs, increased numbers of multiple occupancy properties have the potential to create negative impacts. Over many years across the Coventry area, many issues have been reported to the Council<sup>18</sup>, including concern about the increasing numbers and concentrations of HMOs and their effects on reduced social cohesion, reduced housing choice, reduced community engagement with a more transient population, and overlooking with loss of privacy – all of which can affect health and wellbeing of residents.
- 3.5 It is understood that non-student HMOs are generally clustered across wards in Sherbourne, Whoberley, and Upper/Lower Stoke. The level of student population in the city is also a factor affecting the amount and distribution of HMOs. The residential areas that tend to have high concentrations of student populations are the areas that surround or are accessible easily to the city's two universities. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities.

<sup>15</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>16</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>17</sup> <https://coventry-city-council.github.io/imd/2019/>

<sup>18</sup> Coventry City Council (2022) Supporting Case for Homes in Multiple Occupation (HMOs)

## Climate Change

- 3.6 Coventry was one of the first cities to produce a Climate Change Strategy in 2012 with a target to reduce carbon dioxide emissions by 27.5% by the year 2020. Coventry achieved this in 2014 – six years early. The Strategy is currently under review and will set targets to reflect the current urgency of the climate crisis that is recognised by the City Council. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. It is also important to understand the implications for climate change and the historic environment.

## Transport, Air Quality & Noise

- 3.7 A Coventry City-Wide AQMA was declared<sup>19</sup> for nitrogen dioxide in 2009 and emissions from road transport are the principal source of NO<sub>2</sub>. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO<sub>2</sub> standard. The LAQM annual status report<sup>20</sup> 2020 advises that there is a general decline in levels of nitrogen dioxide and that levels of particulates – PM<sub>10</sub> – do not exceed national standards. The main concern remains associated with the major arterial routes with high levels of queuing traffic contributing vehicle emissions.
- 3.8 Noise is a common problem arising from transport, and studies have shown it can have major negative direct and indirect effects on health and well-being and on quality of life. Noise and disturbance resulting from intensification of residential use and/or constantly changing nature of households is an issue of concern that has been reported to the Council.

## Natural Resources – Waste Management

- 3.9 Around 92% of residual municipal solid waste from the Coventry area is incinerated within an Energy from Waste facility and this heats eight major buildings in the city centre. There are concerns about detriment to visual amenity and potentially health/wellbeing resulting from poor waste management. Also, risks to highway safety through accumulation of poorly stored waste on the pavement or roadside.

## Historic Environment

- 3.10 Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Coventry has over 400 Listed Buildings of national importance, together with over 280 buildings selected by the Council

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<sup>19</sup> [https://uk-air.defra.gov.uk/aqma/details?aqma\\_ref=625](https://uk-air.defra.gov.uk/aqma/details?aqma_ref=625)

<sup>20</sup> <https://www.coventry.gov.uk/downloads/file/36081/2020-air-quality-annual-status-report-asr->

for Local Listing. The city has 16 Conservation Areas<sup>21</sup>, 20 Scheduled Monuments 4 Registered Parks and Gardens, and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record<sup>22</sup>. Historic England advised that understanding the effects of climate change on the historic environment is important, particularly as Coventry has a lot of older housing stock, some of which will be, or may become, HMOs.

### Landscape & Visual Amenity

- 3.11 Coventry is located within the Arden National Character Area (NCA) as profiled by Natural England<sup>23</sup>. The NCA comprises farmland and former wood-pasture lying to the south and east of Birmingham; the eastern part abuts and surrounds Coventry. The Coventry Historic Landscape study<sup>24</sup> (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council.
- 3.12 Concerns have been raised about intensification of HMOs and detriment to visual amenity resulting from poor waste management, poor property maintenance, accumulative external alterations to properties, and use of frontage areas for off-street parking.

### Do-Nothing Situation

- 3.13 If the Council continues to rely on CLP Policy H11 HMOs, the issues and concerns reported to the Council are likely to become exacerbated. The Council has identified three key strategic issues arising if nothing is done, as follows:
- Cumulative negative effects on the qualities and characteristics of a residential area
  - Negative effects at a local level when an existing dwelling is sandwiched between two HMOs
  - Negative effects at a ward level with an accumulation of HMOs resulting in an unbalanced community

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<sup>21</sup> [https://www.coventry.gov.uk/downloads/download/904/conservation\\_area\\_maps](https://www.coventry.gov.uk/downloads/download/904/conservation_area_maps)

<sup>22</sup> <https://www.coventry.gov.uk/heritage-ecology-trees/coventry-historic-environment-record>

<sup>23</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands>

<sup>24</sup> <https://www.coventry.gov.uk/downloads/file/11670/coventry-historic-landscape-characterisation-report>

## 4 SA of HOMES in MULTIPLE OCCUPATION (HMO) DEVELOPMENT PLAN DOCUMENT (DPD)

### SA of Options for Concentrations & Thresholds

- 4.1 Options for thresholds and concentrations of HMOs at 5% & 10% and 100m & 750m were investigated through SA using the SA framework of objectives and the findings are detailed in Appendix IV of this SA Report. The summary SA findings are shown in the table, as follows:

**Table 4.1: Summary SA of Options for Concentrations & Thresholds**

SA Objective	Threshold		Concentration	
	5%	10%	100m	750m
SA No 1: <b>Improve accessibility to and use of basic services and amenities to all residents.</b>	0	0	0	0
SA No 2: <b>Enable vibrant and inclusive communities that participate in decision-making</b>	+?	++?	++?	+?
SA No 3: <b>Reduce social exclusion and poverty</b>	0	0	0	0
SA No 4: <b>Improve health, reduce health inequalities and promote active living</b>	+	+	+	+
SA No 5: <b>Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs</b>	+?	++?	++?	+?
SA No 6: <b>To reduce crime, disorder and fear of crime</b>	+?	+	+	+?
SA No 7: <b>To encourage increased cultural and recreational activities across all sectors of the community</b>	0	0	0	0
SA No 8a: <b>To protect and enhance landscapes, local countryside, open spaces</b>	++?	+	+	-?
SA No 8b: <b>To protect and enhance the historic environment, and the setting of heritage assets</b>	++?	+	+	-?
SA No 9: <b>To protect and enhance biodiversity</b>	Scoped out			
SA No 10: <b>Promote a high quality built environment by improving design &amp; layout &amp; encourage local distinctiveness</b>	0	0	0	0
SA No 11: <b>Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	++?	+	+	-?
SA No 12: <b>Minimise and manage the risk of flooding &amp; the impacts of climate change</b>	Scoped out			

SA No 13: <b>To minimise greenhouse gas emissions and energy use, increase energy efficiency &amp; renewable energy</b>	0	0	0	0
SA No 14: <b>To minimise use of water, minerals and other natural resources</b>	0	0	0	0
SA No 15: <b>To reduce travel by car and air</b>	0	0	0	0
SA No 16: <b>To reduce pollution and waste generation and increase levels of reuse and recycling</b>	++?	+	+	-?
SA No 17: <b>To meet local needs locally</b>	+	+	+	+
SA No 18: <b>To improve Coventry's economy</b>	Scoped out			
SA No 19: <b>To ensure access to good quality employment opportunities for all</b>	Scoped out			
SA No 20: <b>Good education and training opportunities for all</b>	Scoped out			

- 4.2 There were several SA objectives for which the HMO policies had only a negligible or neutral effect. SA No 3 focuses on reducing social exclusion and poverty; SA No 7 focuses on encouraging increased cultural and recreational activities; SA No 10 seeks to promote a high quality built environment by improving design and layout of new development; SA No 13 is focused on mechanisms to minimise greenhouse gas emissions; SA No 14 protects natural resources; and SA No 15 seeks to reduce travel by car. The HMO DPD in itself will not affect these sustainability factors significantly, and mitigation is provided by other CLP policies.
- 4.3 **Communities, Health & Housing:** Objective SA No 2 aims to enable vibrant and inclusive balanced communities. The Council recognises potential cumulative negative effects through incremental intensification of HMOs in an area. This is already experienced in some areas and resulting in unbalanced communities. The proactive planning for HMOs through the DPD is likely to have major positive effects by mitigating for such unbalance in communities.
- 4.4 This mitigation may be limited by reducing the concentration to 5% and by extending the distance to 750m - less likely to resolve existing problems of unbalanced communities. There may still be a focus of HMOs in certain areas such that the objectives for balanced communities and affordable housing for all are not so well progressed - therefore, only minor positive effects. There is some uncertainty of the precise level of significance and it is noted that the situation will change in time as more purpose built student accommodation (PBSA) becomes established. SA No 17 aims to meet local needs locally. Proactive planning through the DPD intentions will have likely positive effects but some uncertainty with extending the radius to 750m as may still result in an accumulation of HMOs in some areas. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character.



- 4.5 The proactive approach to managing housing is likely to have positive effects for all options, since provision and access to decent quality housing is known to have positive effects for health. The DPD is responding to an identified need in housing and thus, overall major positive effects through provision of a particular type of housing with identified need.
- 4.6 However, by reducing the concentration threshold to 5% existing HMOs, there may be less support for progressing HMOs (as the concentration might be considered to be too restrictive) - and this type of housing is an important identified need, so that the positive effects may be reduced to minor. Similarly, if the distance is extended to 750m, this would seem to extend the concentration of HMOs and limit the areas to which the DPD would apply – therefore, potential for not progressing the housing objectives and positive effects reduced to minor.
- 4.7 Minor positive effects are indicated for objectives to reduce crime, but these are less certain if the DPD only applies to where there is a concentration of 5% and/or a 750m radius – less likely to resolve an existing sustainability problem when applied across the city as whole.
- 4.8 **Townscape/Landscape & Historic Environment:** The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out to 750m, the risk of adverse effects on townscape and the historic environment are increased, less mitigated – and there is some uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs and the potential for minor negative effects as accumulation continues. Retaining the distance to 100m, mitigation is more certain and with resolution of the existing sustainability problems.
- 4.9 **Air & Noise Pollution; Waste Management:** Minor positive effects as the potential for negative effects on nuisance odour or air quality associated with road traffic and waste management has been reduced through limiting HMOs in areas where there are existing sustainability issues. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out of 750m, the risk of adverse effects on nuisance odour and air quality are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs and risk of negative effects. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems and confirming likely positive effects.

### Outline Reasons for Progressing the Preferred Option

- 4.10 The Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. Research based on similar sized cities, such as Warwick, Birmingham, and Liverpool, already implementing an HMO policy indicates that this threshold is appropriate and reasonable. High concentrations of HMOs are already having an adverse impact on character and amenity in Coventry, and the Council aims to help maintain mixed and balanced communities. Reducing the concentration threshold to 5% existing HMOs would reduce further negative effects on amenity topics but might risk restricting the number of HMOs supported and progressed with issues for meeting the need for this kind of housing. Extending the radius distance to 750m could risk continued accumulation of HMOs and possible negative effects for amenity and community factors.
- 4.11 Therefore, the Council continues to consider that the proposed threshold and concentration of 10% and 100m is suitable and deliverable; it does not restrict the progress of HMO delivery and it provides mitigation to reduce the cumulative negative effects for amenity and communities. Each HMO application will be considered on a case by case approach, and this will include the consideration of the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing.

### SA of HMO DPD Policies

- 4.12 The proposed four policies for the HMO DPD was tested through SA using the SA Framework and professional judgment with the evidence base. Details of the SA findings are presented in Appendix IV of this report and summary findings are shown in Table 4.1, as follows:

**Table 4.2: Summary SA of Policies**

SA Objective	Policy HMO1	Policy HMO2	Policy HMO3	Policy HMO4
SA No 1: <b>Improve accessibility to and use of basic services and amenities to all residents.</b>	0	0	0	0
SA No 2: <b>Enable vibrant and inclusive communities that participate in decision-making</b>	0	++?	+	0
SA No 3: <b>Reduce social exclusion and poverty</b>	0	0	0	0
SA No 4: <b>Improve health, reduce health inequalities and promote active living</b>	+	+	+	++
SA No 5: <b>Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs</b>	++?	++?	0	++
SA No 6:	+	+	++?	+

<b>To reduce crime, disorder and fear of crime</b>				
SA No 7: <b>To encourage increased cultural and recreational activities across all sectors of the community</b>	0	0	0	0
SA No 8a: <b>To protect and enhance landscapes, local countryside, open spaces</b>	0	+	+	0
SA No 8b: <b>To protect and enhance the historic environment, and the setting of heritage assets</b>	0?	+	0	0?
SA No 9: <b>To protect and enhance biodiversity</b>	Scoped out			
SA No 10: <b>Promote a high quality built environment by improving design &amp; layout &amp; encourage local distinctiveness</b>	0	0	0	0
SA No 11: <b>Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	0	+	+	+
SA No 12: <b>Minimise and manage the risk of flooding &amp; the impacts of climate change</b>	Scoped out			
SA No 13: <b>To minimise greenhouse gas emissions and energy use, increase energy efficiency &amp; renewable energy</b>	0	0	0	0
SA No 14: <b>To minimise use of water, minerals and other natural resources</b>	0	0	0	0
SA No 15: <b>To reduce travel by car and air</b>	0	0	0	0
SA No 16: <b>To reduce pollution and waste generation and increase levels of reuse and recycling</b>	0	+	+	+
SA No 17: <b>To meet local needs locally</b>	+	+	0	0
SA No 18: <b>To improve Coventry's economy</b>	Scoped out			
SA No 19: <b>To ensure access to good quality employment opportunities for all</b>	Scoped out			
SA No 20: <b>Good education and training opportunities for all</b>	Scoped out			

4.13 There were several SA objectives for which the HMO policies had only a negligible or neutral effect. SA No 3 focuses on reducing social exclusion and poverty; the HMO DPD policies will not in themselves reduce poverty as defined by the SA sub-objectives and therefore, neutral effects. SA No 7 focuses on encouraging increased cultural and recreational activities; the HMO policies will not in themselves affect cultural and recreational activities and therefore, neutral effects.

4.14 Objective SA No 10 seeks to promote a high quality built environment by improving design and layout of new development; the HMO policies in

themselves will not affect a high quality built environment as defined by the sub-objectives and therefore, neutral effects. SA No 13 is focused on mechanisms to minimise greenhouse gas emissions – this will be promoted through other Policies in the CLP and therefore, neutral effects from the HMO DPD in itself.

- 4.15 The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives for water, land and energy. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.
- 4.16 SA No 15 seeks to reduce travel by car. The Council will consider the accessibility to local amenities and public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised. Nonetheless, the implications overall for reducing car travel are likely to be negligible and therefore, neutral effects.
- 4.17 Objective SA No 2 aims to enable vibrant and inclusive communities, including to reduce the potential for social isolation particularly with regard to potentially disadvantaged groups. The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people<sup>25</sup>. This indicates that currently communities tend to be balanced.
- 4.18 The Council recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs – and already experienced in some areas. Thus, the intention of Policy HMO2 with thresholds and concentrations is to mitigate/reduce the likely negative effects on the vibrancy and inclusivity of communities by limiting further HMOs in areas where there are already causing negative effects. In this way, the DPD is resolving an existing sustainability problem.
- 4.19 The concentration of 10% or more of all dwellings within 100m radius of the centre point of the application property has been carefully selected after research on other similar cities in England and determining what was appropriate and deliverable. It is considered that 10% is a modest threshold given the size and scale of the problem. Therefore, likely major positive effects indicated as the policy is resolving an existing sustainability problem of unbalanced communities due to an over-concentration of HMOs in some areas, particularly for student shared accommodation where there is transience and short-term living with perhaps different lifestyles to nearby residents. Some uncertainty of the precise level of significance and noting that the situation will change in time as more purpose built student accommodation (PBSA) becomes established.

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<sup>25</sup> Coventry City Council (2022) Supporting Case for Homes in Multiple Occupation (HMOs)

- 4.20 SA No 4 aims to improve health, reduce health inequalities and promote active living. The provision of good quality housing, amenity, accessibility to services/facilities and green/open spaces, active travel and lifestyle all contribute to good health.<sup>26</sup> By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions, all four DPD policies are likely to have minor positive effects on health objectives.
- 4.21 For Policy HMO4, all the requirements set out in criteria (a) – (f) in are likely to have positive effects on health and wellbeing, including considerations of suitable space for households, no adverse nuisance impacts from increased noise, disturbance or activities, safe and secure external space, and suitable waste management. Thus, major positive effects are indicated that will be cumulative in the longer term. It may be noted that concerns about health and wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process<sup>27</sup>.
- 4.22 Objective SA No 5 aims to provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs. The DPD is taking a proactive approach to manage the potential negative effects that could arise for housing balance as the need for HMOs is met locally. The requirements in HMO1 for good access and provision of satisfactory living conditions ensure that the SA objectives for housing are supported. The concentrations and thresholds set out in HMO2 will ensure that housing is more balanced by avoiding concentrations of HMOs. The requirements in HMO4 for suitable amenity and design ensure that the SA objectives for housing are supported. Policy HMO3 on sandwiching is not directly relevant to housing objectives and therefore, neutral effects.
- 4.23 The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character. There is some concern that the HMO will limit certain housing types, especially student accommodation.<sup>28</sup> However, this is not the intention of the DPD and as the provision of PBSA increases, the likely cumulative negative effects in certain areas will reduce. The DPD is responding to an identified need in housing and objectives to provide decent and affordable housing for all; thus, overall major positive effects indicated.
- 4.24 SA No 6 aims to reduce crime, disorder and fear of crime. It is understood that some residents have been concerned about increases in anti-social behaviour associated with HMOs. The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations and that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour; therefore, minor positive effects indicated for all four policies. Through Policy HMO3, avoiding localised intensification by avoiding sandwiching of HMOs may have further positive effects on reducing the likelihood of anti-social behaviour as communities will

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<sup>26</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

<sup>27</sup> <https://www.coventry.gov.uk/housing-enforcement/hmo-licensing>

<sup>28</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

be more balanced – some uncertainty of precise significance as this depends on specific locations. The criterion (e) in Policy HMO4 specifically requires the design of the external space to be safe and secure – with minor positive effects.

- 4.25 SA No 17 aims to meet local needs locally. One of the sub-objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through HMO1-HMO2 and mitigating potential negative effects, the Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally. Policy HMO3 only seeks to avoid sandwiching; it does not affect the ability of HMOs to meet local needs locally – not applicable, neutral effects. Policy HMO4 is not directly relevant to meeting local needs locally and neutral effects indicated.

### **Townscape/Landscape & Historic Environment**

- 4.26 Objective SA No 8 aims to protect and enhance landscapes, open spaces, and the historic environment and its setting. Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance; Policy HMO4 includes requirements in criterion (b) to ensure no demonstrable adverse impact on character. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design and R2 City Centre. Therefore, potential negative effects are mitigated by policy requirements and overall, neutral effects.
- 4.27 It is the deterioration of the visual amenity that can have particular negative effects where there is intensification. Therefore, Policies HMO2 and HMO3 that seek to reduce or avoid cumulative negative effects by more proactively managing concentrations and/or sandwiching of HMOs are likely to have positive effects.
- 4.28 Historic England raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs and there is a need to carefully convert them taking into account historic assets. The historic environment is addressed through other CLP Policies, such as DE1, HE1-2, and R2, with neutral effects for the HMO DPD. However, the provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated for Policy HMO2.

### **Air, Soil, Water, Light & Noise Pollution**

- 4.29 Objective SA No 11 is concerned with enhancing the quality of, and minimising pollution of air, soil, water, light and noise. SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste. Poor air quality in the UK is mostly associated with

road traffic and the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>29</sup>. The Council also has an Air Quality SPD (2019)<sup>30</sup> to help guide development schemes with regard to emissions. Concern has been raised about the increase in numbers of cars and parking for HMOs – all of which could have implications for air quality.

- 4.30 The Council will consider the accessibility to local amenities and public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised. The potential negative effects for nuisance odour and air quality from road traffic associated with cumulative effects from sandwiching are mitigated by the policy requirements in HMO2 and HMO3 that avoid intensification. Criterion (f) of Policy HMO4 requires proposals to include provision of suitably designed refuse bin storage that is not visible from the public realm. Criteria (b) and (d) make specific requirements regarding nuisance noise thus avoiding potential adverse effects. Therefore, overall, likely minor positive effects for policies HMO2-4 as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.

### Waste Management

- 4.31 Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive and unsatisfactory waste generation and storage associated with HMOs. Policy HMO1 requires that proposals should meet with requirements in Policy HMO4 that includes a criterion on refuse management. Therefore, neutral effects for HMO1 as the potential for negative effects associated with wastes have been mitigated through policy requirements. The provision of concentrations & threshold, together with avoidance of sandwiching of HMOs, will better ensure that the intentions are deliverable and that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.

### Implementation of the HMO DPD as a Whole

- 4.32 There were several SA objectives for which the HMO policies had only a negligible or neutral effect. There were no significant negative effects found. The HMO DPD as a whole was found to have positive effects for SA objectives on inclusive communities, health and wellbeing, housing, reducing crime, and for meeting local needs locally. Major positive effects were identified for housing as the DPD is responding to an identified need in this particular type of housing and seeking to manage the need more proactively so that likely negative effects can be mitigated.
- 4.33 The Council has recognised that sustainability problems have developed in certain areas of Coventry and associated with intensification of HMOs. Such negative effects have been reported on amenity and character, including

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<sup>29</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<sup>30</sup> [https://www.coventry.gov.uk/downloads/download/5199/air\\_quality\\_supplementary\\_planning\\_document\\_spd](https://www.coventry.gov.uk/downloads/download/5199/air_quality_supplementary_planning_document_spd)

nuisance noise, overcrowding and highway safety concerns with parking, and odour/health concerns with poor waste management . These likely negative effects have been mitigated through clear policy requirements such that there are no residual negative effects.



## 5 IMPLEMENTATION & MONITORING

- 5.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>31</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the local plan itself. Government requires local planning authorities to produce Monitoring Reports (AMRs), and the Coventry Authority Monitoring Report (AMR)<sup>32</sup> (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

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<sup>31</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>32</sup> [https://www.coventry.gov.uk/downloads/download/2678/annual\\_monitoring\\_reports](https://www.coventry.gov.uk/downloads/download/2678/annual_monitoring_reports)

## 6 CONCLUSION & NEXT STEPS

- 6.1 The SA has been utilised in an iterative and ongoing way to inform decision-making for the development of the HMO DPD. The SA helped confirm that there were no suitable alternatives to the proposals in the DPD that needed testing through the SA process. The DPD addresses one specific issue and thus, it is limited in its scale and sphere of influence. The SA investigated the four draft Policies in the DPD through the SA framework of objectives for sustainable development.
- 6.2 Overall, the SA found that there was strong mitigation provided through policy requirements to mitigate potential negative effects for amenity and character of Coventry areas. This included consideration of avoiding/reducing likely cumulative effects for social isolation, anti-social behaviour, amenity and visual impacts, poor air quality and traffic/parking, nuisance noise, and poor waste management.
- 6.3 The SA found positive effects for objectives on housing, balanced communities, and health and wellbeing. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity and character. The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented. This will resolve existing sustainability problems, and avoid exacerbation of further cumulative negative effects such that overall positive effects are indicated. There were no residual likely negative effects.
- 6.4 This SA/SEA Report is accompanying the draft HMO DPD on formal and public Regulation 19 consultation through the Council's website in early 2023. The Regulation 19 draft DPD and supporting evidence, including this SA Report, will then be submitted to the Secretary of State. Any representations made on the draft plan and the SA will also be provided to the Inspector to be appointed in due course for independent examination of the draft DPD.

## **APPENDICES**

**I: Statement on Compliance with SEA Directive & Regulations**

**II: SA Scoping Report – available separately**

**III: Consultation Representations & Responses**

**IV: SA of Options for Thresholds & Concentrations**

**V: SA of Policies**

## Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive<sup>33</sup> (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)<sup>34</sup>. This is Appendix 1 of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Report (December 2022) – and in accordance with paragraph 32 of the National Planning Policy Framework (2021)<sup>35</sup>.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out the objectives of the Homes in Multiple Occupation Development Planning Document
	Section 3 Context & Baseline	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2022)
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the HMO DPD area. The information is set out in more detail in the SA Scoping Report (2022) that also indicates the likely evolution of current conditions and trends where available

<sup>33</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>34</sup> <http://www.parliament.uk/documents/post/postpn223.pdf>

<sup>35</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised in Section 3 of SA Report; where relevant and available this information is detailed in the SA Scoping Report
<i>Any existing environmental problems which are relevant to the plan including, in particular, those relation to any areas of a particular environmental importance</i>	Section 3 Context & Baseline	Summarises existing sustainability (including environmental problems) for the DPD area. This section also summarises information for Natura 2000 sites in line with Habitats Regulations Assessment requirements.
<i>The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i>	Section 2 SA Methods Section 3 Context & Baseline	Provides the summary of objectives for sustainability in the DPD area (including environmental objectives) and the implications of these objectives for the DPD (refers to details in the SA Scoping Report 2022); explains how the environmental considerations have been taken into account.
<i>The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary,</i>	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that includes the issues listed by the SEA Regulations and are progressed by which SA objectives. This ensures that all relevant issues are considered during the assessment of each policy of the DPD.
	Section 4 Appendix V	Summarises the likely significant effects of implementing the DPD (including environmental effects) with details provided in the appendix. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</i>		
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Section 4 Appendix V	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are summarised in the main report, detailed in the appraisal matrices that comprise the appendices.
<i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>	Section 4 & Appendix IV	The reasons for progressing the preferred option and not taking others forward are presented in Section 4 – para 4.9-4.11.
	Sections 2 & 3 Methods & Context, Baseline; paras 4.1-4.11	Outlines how the assessment was undertaken – the appraisal methodology and any difficulties encountered in compiling information are noted.
<i>A description of the measures envisaged concerning monitoring</i>	Section 5	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the DPD.

<b>SEA Directive &amp; Regulation Requirements</b>	<b>SA Report Section</b>	<b>Summary of Contents</b>
<i>A non-technical summary of the information provided under the above headings</i>	Report preface (available separately)	Provides a non-technical summary.

## Appendix III: Consultation Representations & Responses

### Consultation Representations to SA Scoping Report (April 2022)

Section of SA Scoping Report	Consultee Comments	Enfusion Responses & Action Taken
<b>Environment Agency</b>		
	No comment received	Noted
<b>Historic England</b>		
Chapter 4 Climate Change	One recent publication is Historic England's Climate Change Strategy, March 2022, which we suggest referencing in the SA. Understanding the effects of climate change on the historic environment is important and we suggest that reference is made to this within the SA Scoping document, particularly as Coventry has a lot of older housing stock, some of which will be, or may become, HMOs. Specific projects or actions may be needed to improve the resilience of heritage assets to climate change and plans should set these out. The following links may be of assistance:	Noted, with thanks & added to the SA Scoping Report
Chapter 8 Historic Environment	We welcome the recognition that there may be localised issues/opportunities relating to HMOs and we are pleased to see the retention from the Coventry Local Plan of SA Objective No 8: <i>To protect and enhance landscape, local countryside, open spaces and the historic environment.</i>	Noted, with thanks
Chapter 9 Landscape	Historic England welcomes the recognition given in the SA Scoping document of issues and opportunities for protecting and enhancing the local landscape. Again, we are therefore pleased to see the retention from the Coventry Local Plan of SA Objective No 8: <i>To protect and enhance landscape, local countryside, open spaces and the historic environment.</i>	Noted, with thanks.
Chapter 10 SA Framework	Historic England welcomes SA Objective No 8: <i>"To protect and enhance landscapes, local countryside, open spaces and the historic environment"</i> . However, we suggest that the setting of heritage assets, historic settlements and conservation areas is also referenced within the sub-objectives.	<i>"and their setting"</i> added to SA Objective No 8 Explicit mention of <i>heritage assets, historic settlements and conservation areas &amp; their setting</i> added to first sub-objective



Section of SA Scoping Report	Consultee Comments	Enfusion Responses & Action Taken
	<p>We also welcome SA Objective No 13: <i>“To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources”</i>. However, we suggest adding some further decision making criteria to reflect wider sustainability issues regarding the historic environment, such as improving the energy efficiency of historic buildings and taking into account their embodied carbon value when considering the retention and re-use, versus their replacement.</p>	
Chapter 10 Proposed Approach	<p>Historic England is concerned that it is not clear from the document as to how impacts will be evaluated, as there is no evaluation method, or scoring mechanism, for assessment included, although we acknowledge that paragraph 10.5 alludes to testing policies to determine the nature of their likely sustainability effects. The document does not therefore set out how policies will be assessed or provide detailed information about how potential significant effects will be identified (both positive and negative); for example, using professional judgement and reference to evidence base documents. We strongly recommend that this is included within a revised SA Scoping document and would be happy to discuss any assessment methodology for the historic environment with you ahead of the SA being developed further./</p>	<p>Para 10.5 explains that professional judgment will be used for the assessment stage using the SA framework of objectives with reference to the baseline information, and aligned with table 10.2 for significance. Sensitivity of receptors will vary depending upon sustainability topic. A narrative approach will be taken as appropriate for the SA of this specific DPD. Only 4 policies specific to the issues for HMOs are being proposed. It is not considered necessary/relevant (or possible) to develop specific &amp; quantitative thresholds for each sub-objective.</p>
SA Scoping	<p>Overall, Historic England considers that the amendments to the scope of the SA for Coventry City Council's HMO DPD, as set out above, are necessary to ensure that it meets the requirements of the Directive and Legislation in relation to heritage. The changes suggested will ensure compliance in this respect and will ensure the development of an appropriate framework for assessing the significant effects which this DPD may have upon the historic environment of Coventry. Historic England would be happy to provide further comments as the Sustainability Appraisal for Coventry City</p>	Noted, with thanks

Section of SA Scoping Report	Consultee Comments	Enfusion Responses & Action Taken
	Council's HMO DPD is progressed over the coming months.	
<b>Natural England</b>		
SA Report	Agree with conclusion reached	Noted, with thanks

### Consultation Representations to Draft Reg 18 HMO DPD & relevant to SA (April 2022)

Section of Reg 18 DPD Draft	Consultee Comments relevant to SA/SEA	Enfusion Responses & Action Taken
<b>Residents</b>		
Draft Policy HMO2	<p>Concentrations &amp; Thresholds</p> <p>Several residents expressed concern about the proposed concentration of 10% or more of all dwellings and within 100m radius of the centre point of the application property – where there is an existing HMO concentration, applications will not be supported.</p> <p>Residents are concerned that this may not reflect the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing. Some residents suggested that the Council should consider different concentrations and different thresholds, and for example, suggested 5% and 750m radius.</p>	<p>The Council has set out in the policy supporting text the reasoning for proposing a concentration of 10% or more and within 100m radius.</p> <p>A single threshold of 10% is modest in consideration of issue to be addressed; research based on similar size cities already implementing an HMO policy indicates that this threshold is appropriate &amp; reasonable.</p> <p>High concentrations of HMOs are already having an adverse impact on character &amp; amenity; the Council aims to help maintain mixed &amp; balanced communities.</p> <p>The Council does not consider that there are any other reasonable (deliverable) alternatives that are relevant &amp; that would need to be tested through SA.</p>

## Appendix IV: SA of Options for Thresholds & Concentrations

<b>Sustainability Appraisal Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	<b>Threshold 5%</b>	<b>Threshold 10%</b>	<b>Concentration 100m</b>	<b>Concentration 750m</b>
<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The aims of the HMO DPD is to ensure that potentially harmful concentrations of HMOs do not arise & that a high standard of accommodation & amenity is created. Variations to thresholds & concentrations will not have any specific effects on making accessibility to local services mor affordable or more sustainable & therefore, neutral effect.	0	0	0	0
<b>2: Enable vibrant and inclusive communities that participate in decision-making</b>	The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people <sup>36</sup> . This indicates that currently communities tend to be balanced. It is understood that patterns of supply and demand will change over time. The number of student shared houses may change as there is increasing provision of purpose built student accommodation (PBSA). Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining area; new areas may be identified. It is likely that students will still predominate near the universities. The proposed eleven wards to be included in the Article 4 Direction already have varying levels of existing HMO concentrations. <sup>37</sup> However the proposed policy is intended to apply to the city as a whole.	+?	++?	++?	+?

<sup>36</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

<sup>37</sup> Ibid

	<p>The Council recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs – and already experienced in some areas. Thus, the intention of the thresholds &amp; concentrations is to mitigate/reduce the likely negative effects on the vibrancy and inclusivity of communities by limiting further HMOs in areas where there are already causing negative effects.</p> <p>The concentration of 10% or more of all dwellings within 100m radius of the centre point of the application property has been carefully selected after research on other similar cities in England &amp; determining what was appropriate &amp; deliverable. Therefore, likely major positive effects indicated as the policy is resolving an existing sustainability problem of unbalanced communities due to an over-concentration of HMOs in some areas, particularly for student shared accommodation where there is transience &amp; short-term living with perhaps different lifestyles to nearby residents. Restricting the concentration to where there are existing HMOs to only 5% and/or extending the radius to beyond 750m is less likely to resolve existing problems of unbalanced communities. There may still be a focus of HMOs in certain areas such that the objectives for balanced communities &amp; affordable housing for all are not so well progressed - therefore, only minor positive effects.</p> <p>Some uncertainty of the precise level of significance &amp; noting that the situation will change in time as more PBSA becomes established.</p>				
<b>3: Reduce social exclusion and poverty</b>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>38</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p>	0	0	0	0

<sup>38</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>There is some concern<sup>39</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people &amp; those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. The concentrations and thresholds seek to mitigate/reduce potential negative effects on amenity &amp; character. Therefore, no significant effects on social inclusion and overall, neutral effects.</p>				
<p><b>4: Improve health, reduce health inequalities and promote active living</b></p>	<p>The provision of good quality housing, amenity, accessibility to services/facilities &amp; green/open spaces, active travel &amp; lifestyle all contribute to good health.<sup>40</sup></p> <p>By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions<sup>41</sup>, the DPD is likely to have minor positive effects on health objectives. It may be noted that concerns about health &amp; wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process.</p> <p>It is assumed that applications for HMOS will be subject to building control regulation &amp; any other applicable standards that ensure the adequacy of the building for the purposes of housing. The Council will make a judgment on satisfactory living conditions according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects associated with healthy housing are mitigated. Minor positive effects indicated for health objectives through provision of a particular type of housing – effects not significantly influenced by options for thresholds or concentrations.</p>	+	+	+	+

<sup>39</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>40</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

<sup>41</sup> Adequate housing defined as housing which meets minimum structural, heating, lighting, ventilation, sanitary, occupancy, and maintenance standards compatible with applicable building and housing codes, as determined under rules of the authority <https://www.lawinsider.com/dictionary/adequate-housing>

<p><b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b></p>	<p>The changing demographic &amp; economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no significant negative effects on amenity &amp; character. There is some concern that the HMO will limit certain housing types, especially student accommodation.<sup>42</sup> However, as the provision of PBSA increases, the likely cumulative negative effects in certain areas will reduce.</p> <p>The DPD is responding to an identified need in housing &amp; thus, overall major positive effects through provision of a particular type of housing with identified need – effects not significantly influenced by options for thresholds or concentrations. However, by reducing the concentration threshold to 5% existing HMOs, there may be less support for progressing HMOs (as the concentration might be considered to be too restrictive) - and this type of housing is an important identified need, so that the positive effects may be reduced to minor. Similarly, if the distance is extended to 750m, this would seem to extend the concentration of HMOs and limit the areas to which the DPD would apply – therefore, potential for not progressing the housing objectives &amp; positive effects reduced to minor.</p> <p>Some uncertainty as the extent of the significance of the positive effects is unclear at this stage.</p>	+?	++?	++?	+?
<p><b>6: To reduce crime, disorder and fear of crime</b></p>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp; sexual offences.<sup>43</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; mitigation measures are implemented to help resolve an existing sustainability</p>	+?	+	+	+?

<sup>42</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>43</sup> <https://crimerate.co.uk/west-midlands/coventry>

	problem. Therefore, minor positive effects are indicated but these are less certain if the DPD only applies to where there is a concentration of 5% and/or a 750m radius – less likely to resolve an existing sustainability problem when applied across the city as whole.				
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations & that they meet with various requirements that are more likely to limit the potential for negative effects on cultural & recreational activities. This is unlikely to be influenced significantly by options for thresholds and concentrations; therefore, likely neutral effects.	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design & R2 City Centre. Therefore, potential negative effects mitigated by policy requirements & overall, neutral effects.	<b>++?</b>	<b>+</b>	<b>+</b>	<b>-?</b>
	The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out to 750m, the risk of adverse effects on amenity/townscape are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs & potential for minor negative effects as accumulation continues. Retaining the distance to 100m, mitigation is more certain & resolution of the existing sustainability problems.				
	HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs & there is a need to carefully convert them taking into account historic assets & also with regard to climate change (see also later SA No 13).	<b>++?</b>	<b>+</b>	<b>+</b>	<b>-?</b>

	The historic environment is addressed through other CLP Policies, such as DE1, HE1-2, & R2. The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out of 750m, the risk of adverse effects on the historic environment are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs & risk of minor negative effects. Retaining the distance to 100m, mitigation is more certain & resolution of the existing sustainability problems.				
<b>9: Biodiversity</b>	Scoped out				
<b>10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments</b>	The aims of the HMO DPD is to ensure that potentially harmful concentrations of HMOs do not arise & that a high standard of accommodation & amenity is created. It is not directly associated with design – covered by other CLP policies - and therefore, neutral effects.	0	0	0	0
<b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste.  Poor air quality in the UK is mostly associated with road traffic & the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations <sup>44</sup> . Concern has been raised about the increase in numbers of	++?	+	+	-?

<sup>44</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)



	<p>cars &amp; parking for HMOs – all of which could have implications for air quality. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; that mitigation measures are implemented to resolve existing sustainability problems such that minor positive effects are indicated.</p> <p>The Council will consider the accessibility to local amenities &amp; public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.</p> <p>Minor positive effects as the potential for negative effects on nuisance odour or air quality associated with road traffic has been reduced through limiting HMOs in areas where there are existing sustainability issues. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. This indicates further positive effects overall but uncertainty of precise significance.</p> <p>By extending the distance out to 750m, the risk of adverse effects on nuisance odour &amp; air quality are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs &amp; risk of negative effects. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems &amp; confirming likely positive effects.</p>				
<b>12: Flood Risk</b>	Scoped out				
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	0	0	0	0

<b>generated from renewable resources</b>					
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	0	0	0	0
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	0	0	0	0
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs.	++?	+	+	-?
	The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. This indicates further positive effects overall but uncertainty of precise significance. By extending the distance out of 750m, the risk of adverse effects associated with poor waste management are increased, less mitigated – and there is uncertainty of any positive effects, particularly for those areas that already have an accumulation of HMOs – potential for negative effects as accumulation continues. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems & confirming likely positive effects.				
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through application of concentrations & thresholds to mitigate potential & existing negative effects, the	+?	+	+	+?

	<p>Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally.</p> <p>By reducing the concentration of HMOs to 5%, there may be less support for progressing HMOs (as the concentration might be considered to be too restrictive) - and this type of housing is an important identified need, so that the positive effects may be reduced to minor. Similarly, is the distance is extended to 750m, this would seem to extend the concentration of HMOs and limit the areas to which the DPD would apply – therefore, potential for not progressing the housing objectives &amp; some uncertainty about the positive effects for meeting local needs locally.</p>				
<b>18: Economy</b>	Scoped out				
<b>19: Employment</b>	Scoped out				
<b>20: Education &amp; Training</b>	Scoped out				

**Appendix V: SA of Policies**

<b>Policy HMO1</b>	<p><b>HMOs:</b> All proposals for the provision of HMOs will be required to demonstrate that:</p> <p>a) there is good accessibility to local amenities and public transport;</p> <p>b) they accord with the emerging Accessible Homes standards<sup>[2]</sup> (or future equivalent) and provide satisfactory living conditions for the intended occupiers; and</p> <p>c) there will be no demonstrably adverse impact on the amenity of neighbouring properties or the character of the area by way of character, appearance, highway safety and parking. The proposal must also meet the criteria in draft policy HMO4.</p>
<b>Policy HMO2</b>	<p><b>CONCENTRATIONS &amp; THRESHOLDS:</b> Where there is an existing HMO concentration of 10% or more of all dwellings within 100 metres radius of the centre point of the application property, HMO applications will not be supported. Where there is an existing HMO concentration of less than 10% within 100 metres radius of the centre point of the application property, HMO applications will be considered against the other Policies in this DPD and all other relevant policies.</p>
<b>Policy HMO3</b>	<p><b>SANDWICHING:</b> Proposals for the provision of HMOs must not result in a non-HMO dwelling being sandwiched between two HMOs and must not lead to a continuous frontage of three or more HMOs.</p> <p>Sandwiching includes:</p> <ul style="list-style-type: none"> <li>• Up to three single residential properties in a street located between two single HMO properties;</li> <li>• Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;</li> <li>• A residential flat within a sub-divided building where the majority of flats are HMOs.</li> <li>• A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;</li> <li>• A residential flat within a sub-divided building located between two HMO flats above and below; and</li> <li>• A residential flat within a sub-divided building located between two HMO flats on both sides.</li> </ul>

<b>Policy HMO4</b>	<p><b>AMENITY &amp; DESIGN:</b> All proposals for the provision of HMOs will be assessed against the following criteria:</p> <p>a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated;</p> <p>b) There would be no demonstrably adverse impact on the amenity of neighbouring properties and the character of the surrounding area in particular through increased activity, noise or disturbance;</p> <p>c) The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements* and light and ventilation;</p> <p>d) The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation;</p> <p>e) The design of external space is safe and secure, and includes provision for refuse storage, washing facilities and adequate vehicular and cycle parking, and ensures access to outdoor amenity space; and</p> <p>f) Refuse bin storage is provided externally within the curtilage of the property, within a suitably designed structure and the refuse bin not visible from the public realm.</p>
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**Significance Key**

	Description & Significance of Effect
++	Major Positive
+	Minor Positive
0	Neutral/no impact
-	Minor Negative
--	Major Negative
?	Uncertain

Policy HMO1 Homes in Multiple Occupation		
Sustainability Appraisal Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		<p><b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b></p> <p>The Policy requires that all proposals for provision of HMOs should have good accessibility to local amenities and public transport. However, it does not define what "good access" represents. Accessibility standards for walkability vary according to the type of facility/service, the number of people required to support it, the density of the area and the local geography.<sup>45</sup> The provision of HMOs will not have any effects on improving accessibility or make access more affordable. The Council will make a judgment on good access according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects are mitigated – therefore, neutral effect.</p>
<p><b>2: Enable vibrant and inclusive communities that participate in decision-making</b></p> <p>The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people<sup>46</sup>. This indicates that currently communities tend to be balanced. It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about a concentration of HMOs in certain parts of the city – those with a lower density &amp; characterised by fewer larger houses. This could result in an unbalanced community with the potential for social isolation, in particular for older people who may often characterise such areas, and the transient shorter-term &amp; different lifestyle that typically may characterise student accommodation.</p> <p>The Council has already recognised the potential for cumulative negative effects on communities &amp; risk of social isolation in areas where HMOs have accumulated. There is the intention for an Article 4 designation to remove PDRs changing the use of a C3 property (dwelling house) to a C4 property</p>	0	

<sup>45</sup> Barton, Grant & Guise (3<sup>rd</sup> edition 2021) Shaping Neighbourhoods for Local Health & Global Sustainability

<sup>46</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

	<p>(house in multiple occupation) in certain wards of the city – and this will help mitigate negative effects when implemented.</p> <p>Nonetheless, the Council still recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs. Mitigation for such cumulative effects is provided by the requirement for applications to be assessed using criteria in Policies HMO01 &amp; HMO04 that aim to resolve potential amenity impacts that could affect potential groups of people such as the elderly – therefore, neutral effects.</p>	
<b>3: Reduce social exclusion and poverty</b>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>47</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p> <p>There is some concern<sup>48</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people &amp; those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. Therefore, no significant effects on social inclusion and overall, neutral effects.</p>	<b>0</b>
<b>4: Improve health, reduce health inequalities and promote active living</b>	<p>The provision of good quality housing, amenity, accessibility to services/facilities &amp; green/open spaces, active travel &amp; lifestyle all contribute to good health.<sup>49</sup></p>	<b>+</b>

<sup>47</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>48</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>49</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

	<p>By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions<sup>50</sup>, the DPD is likely to have minor positive effects on health objectives. Policy HMO1 requires proposals to meet with the criteria in Policy HMO4 which includes requirements for HMO licensing.<sup>51</sup></p> <p>It may be noted that concerns about health &amp; wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process.</p> <p>It is assumed that applications for HMOS will be subject to building control regulation &amp; any other applicable standards that ensure the adequacy of the building for the purposes of housing. The Council will make a judgment on satisfactory living conditions according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects associated with healthy housing are mitigated.</p>	
<b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b>	The changing demographic & economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The requirements in HMO1 for good access & provision of satisfactory living conditions ensure that the SA objectives for housing are supported. The DPD is responding to an identified need in housing & thus, overall major positive effects indicated with some uncertainty as the extent of the significance of the positive effects is unclear at this stage.	++?
<b>6: To reduce crime, disorder and fear of crime</b>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp; sexual offences.<sup>52</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. Therefore, minor positive effects are indicated.</p>	+
<b>7: To encourage increased cultural and</b>		0

<sup>50</sup> Adequate housing defined as housing which meets minimum structural, heating, lighting, ventilation, sanitary, occupancy, and maintenance standards compatible with applicable building and housing codes, as determined under rules of the authority <https://www.lawinsider.com/dictionary/adequate-housing>

<sup>51</sup> <https://www.coventry.gov.uk/housing-enforcement/hmo-licensing>

<sup>52</sup> <https://crimedata.co.uk/west-midlands/coventry>



<p><b>recreational activities across all sectors of the community</b></p>	<p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for negative effects on cultural &amp; recreational activities. The Council has recognised the possibilities for cumulative adverse effects &amp; made provision for requirements to mitigate negative effects, including on cultural &amp; recreational facilities. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects.</p>	
<p><b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b></p>	<p>Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design &amp; R2 City Centre. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects.</p>	<p><b>0</b></p>
<p><b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b></p>	<p>HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs &amp; there is a need to carefully convert them taking into account historic assets &amp; also with regard to climate change (see also later SA No 13). It is suggested that the Council consider adding "and historic assets &amp; their setting" to criterion c in HMO01 to make explicit that the historic environment is included in character &amp; appearance of an area. Nonetheless, the historic environment is addressed through other CLP Policies, such as DE1, HE1-2, &amp; R2. Therefore, likely neutral effects through mitigation in policy wording, but some uncertainty as to precise significance with regard to the historic environment.</p>	<p><b>0?</b></p>
<p><b>9: Biodiversity</b></p>	<p>Scoped out</p>	
<p><b>10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments</b></p>	<p>Policy HMO1 requires no demonstrative adverse impact on character or appearance. Proposals will be required to meet with other CLP policies, including DE1 High Quality Design – therefore, neutral effects.</p>	<p><b>0</b></p>
<p><b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b></p>	<p>SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste. Policy HMO1 requires proposals to meet with HMO4 which includes a criterion addressing refuse disposal/storage.</p>	<p><b>0</b></p>

	<p>Poor air quality in the UK is mostly associated with road traffic &amp; the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>53</sup>. Concern has been raised about the increase in numbers of cars &amp; parking for HMOs – all of which could have implications for air quality. Policy HMO1 requires that there will be no demonstrable adverse impact on highway safety and parking, indicating that there will be no significant increase in the poor air quality associated with road traffic. The Council will consider the accessibility to local amenities &amp; public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.</p> <p>Therefore, neutral effects as the potential for negative effects on nuisance odour or air quality associated with road traffic has been mitigated through policy requirements.</p>	
<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	<b>0</b>
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs. Policy HMO1 requires that proposals should meet with requirements in Policy HMO4 that includes a criterion on refuse	<b>0</b>

<sup>53</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<b>and increase levels of reuse and recycling</b>	management. Therefore, neutral effects as the potential for negative effects associated with wastes have been mitigated through policy requirements.	
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through HMO1 and mitigating potential negative effects, the Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally.	<b>+</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	
<b>20: Education &amp; Training</b>	Scoped out	

<b>Policy HMO2 Concentrations &amp; Thresholds</b>		
<b>Sustainability Appraisal Objective</b>	<b>Assessment of Effects</b> <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The Policy aims to ensure that potentially harmful concentrations of HMOs do not arise & that a high standard of accommodation & amenity is created. This will not have any specific effects on improving accessibility to local services & therefore, neutral effect.	<b>0</b>
<b>2: Enable vibrant and inclusive communities</b>	The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly	<b>++?</b>

<p><b>that participate in decision-making</b></p>	<p>occupied by students, provide accommodation for a range of people<sup>54</sup>. This indicates that currently communities tend to be balanced. It is understood that patterns of supply and demand will change over time. The number of student shared houses may change as there is increasing provision of purpose built student accommodation (PBSA). Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining area; new areas may be identified. It is likely that students will still predominate near the universities. The proposed eleven wards to be included in the Article 4 Direction already have varying levels of existing HMO concentrations.<sup>55</sup> However the proposed policy is intended to apply to the city as a whole.</p> <p>The Council recognises the risk of cumulative negative effects through incremental intensification in an area caused by numerous changes of use from small HMO to large HMO or an extension to existing HMOs – and already experienced in some areas. Thus, the intention of the thresholds &amp; concentrations is to mitigate/reduce the likely negative effects on the vibrancy and inclusivity of communities by limiting further HMOs in areas where there are already causing negative effects. The concentration of 10% or more of all dwellings within 100m radius of the centre point of the application property has been carefully selected after research on other similar cities in England &amp; determining what was appropriate &amp; deliverable. It is considered that 10% is a modest threshold given the size and scale of the problem. Therefore, likely major positive effects indicated as the policy is resolving an existing sustainability problem of unbalanced communities due to an over-concentration of HMOs in some areas, particularly for student shared accommodation where there is transience &amp; short-term living with perhaps different lifestyles to nearby residents. Some uncertainty of the precise level of significance &amp; noting that the situation will change in time as more PBSA become established.</p>	
<p><b>3: Reduce social exclusion and poverty</b></p>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>56</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p>	<p><b>0</b></p>

<sup>54</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

<sup>55</sup> Ibid

<sup>56</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>There is some concern<sup>57</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people &amp; those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. The concentrations and thresholds seek to mitigate/reduce potential negative effects on amenity &amp; character. Therefore, no significant effects on social inclusion and overall, neutral effects.</p>	
<p><b>4: Improve health, reduce health inequalities and promote active living</b></p>	<p>The provision of good quality housing, amenity, accessibility to services/facilities &amp; green/open spaces, active travel &amp; lifestyle all contribute to good health.<sup>58</sup></p> <p>By managing potential effects on amenity factors more proactively, and including cumulative effects, and requiring provision of satisfactory living conditions<sup>59</sup>, the DPD is likely to have minor positive effects on health objectives. The policy on concentrations &amp; thresholds provides mitigation that is clearly deliverable to limit potential negative effects on amenity &amp; character that might affect health &amp; wellbeing.</p> <p>It may be noted that concerns about health &amp; wellbeing, including fire risk, size of rooms, access to kitchen/bathroom etc are dealt with through the Council's HMO licensing process.</p> <p>It is assumed that applications for HMOS will be subject to building control regulation &amp; any other applicable standards that ensure the adequacy of the building for the purposes of housing. The Council will make a judgment on satisfactory living conditions according to location, the proposal, and using expert/specialist judgment as necessary on a case by case basis. Thus, it is ensured that potential adverse effects associated with healthy housing are mitigated.</p>	+
	<p>The changing demographic &amp; economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no</p>	++?
<p><b>5: Provide decent and affordable housing for</b></p>	<p>The changing demographic &amp; economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The DPD does not seek to limit the number of HMOs but rather to ensure that there are no</p>	++?

<sup>57</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>58</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

<sup>59</sup> Adequate housing defined as housing which meets minimum structural, heating, lighting, ventilation, sanitary, occupancy, and maintenance standards compatible with applicable building and housing codes, as determined under rules of the authority <https://www.lawinsider.com/dictionary/adequate-housing>

<b>all, of the right quantity, type, tenure &amp; affordability for local needs</b>	<p>significant negative effects on amenity &amp; character. There is some concern that the HMO will limit certain housing types, especially student accommodation.<sup>60</sup> However, as the provision of PBSA increases, the likely cumulative negative effects in certain areas will reduce.</p> <p>The DPD is responding to an identified need in housing &amp; thus, overall major positive effects indicated with some uncertainty as the extent of the significance of the positive effects is unclear at this stage.</p>	
<b>6: To reduce crime, disorder and fear of crime</b>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp; sexual offences.<sup>61</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; mitigation measures are implemented to help resolve an existing sustainability problem. Therefore, minor positive effects are indicated.</p>	+
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	<p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for negative effects on cultural &amp; recreational activities.</p> <p>The Council has recognised the possibilities for cumulative adverse effects &amp; made provision for requirements to mitigate negative effects, including on cultural &amp; recreational facilities. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects.</p>	0
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	<p>Policy HMO1 includes requirements to ensure that there will be no demonstrably adverse impact on the character of the area by way of character or appearance. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design &amp; R2 City Centre. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.</p>	+
	<p>HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs &amp; there is a need to carefully convert them taking into account historic assets &amp; also with regard to climate change (see also later SA No 13).</p>	+

<sup>60</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>61</sup> <https://crimerate.co.uk/west-midlands/coventry>

	The historic environment is addressed through other CLP Policies, such as DE1, HE1-2, & R2. The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.	
<b>9: Biodiversity</b>	Scoped out	
<b>10: Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments</b>	Policy HMO2 is concerned with concentrations & thresholds for HMOs; it is not directly associated with design and therefore, neutral effects.	<b>0</b>
<b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	<p>SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste.</p> <p>Poor air quality in the UK is mostly associated with road traffic &amp; the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>62</sup>. Concern has been raised about the increase in numbers of cars &amp; parking for HMOs – all of which could have implications for air quality. The provision of concentrations &amp; thresholds will better ensure that the intentions are deliverable &amp; that mitigation measures are implemented to resolve existing sustainability problems such that minor positive effects are indicated.</p> <p>The Council will consider the accessibility to local amenities &amp; public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.</p> <p>Therefore, minor positive effects as the potential for negative effects on nuisance odour or air quality associated with road traffic has been reduced through limiting HMOs in areas where there are existing sustainability issues.</p>	<b>+</b>

<sup>62</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	<b>0</b>
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs.  The provision of concentrations & thresholds will better ensure that the intentions are deliverable & that mitigation measures are implemented to resolve an existing sustainability problem such that minor positive effects are indicated.	<b>+</b>
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. By taking a proactive approach through application of concentrations & thresholds to mitigate potential & existing negative effects, the Council is recognising the local needs for HMOs and addressing the situation positively. Therefore, minor positive effects indicated for meeting local needs locally.	<b>+</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	



<b>20: Education &amp; Training</b>	Scoped out	
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<b>Policy HMO3 Sandwiching</b>		
<b>Sustainability Appraisal Objective</b>	<b>Assessment of Effects</b> <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The Policy seeks to avoid a non-HMO dwelling being sandwiched between two HMOs & avoid a continuous frontage of 3 or more HMOs which would represent a localised intensification of HMOs that could have adverse impacts on amenity. This includes seeking to reduce the potential for reduced community services that might result from a shift in retail/business sectors towards a narrower demographic such as a proliferation of hot food takeaways. Therefore, it is ensured that potential cumulative negative effects are mitigated – therefore, neutral effect.	<b>0</b>
<b>2: Enable vibrant and inclusive communities that participate in decision-making</b>	The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (3 bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people <sup>63</sup> . This indicates that currently communities tend to be balanced. The Council recognises the risk of cumulative negative effects through incremental intensification in an area & the policy seeks to avoid a non-HMO dwelling being sandwiched between two HMOs & avoid a continuous frontage of 3 or more HMOs. This will allow a more balanced population & contribute to more vibrant and inclusive communities with likely minor positive effects.	<b>+</b>

<sup>63</sup> Coventry City Council (2022) **Supporting Case for Homes in Multiple Occupation (HMOs)**

<b>3: Reduce social exclusion and poverty</b>	<p>In Coventry, the population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. This is higher than the overall increase for England (6.6%)<sup>64</sup>. As of 2021, Coventry is the fourth most densely populated of the West Midlands 30 local authority areas. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population &amp; this reflects the growth of the city's further/higher education institutions. These demographic changes, together with economic factors, have made it increasingly difficult for younger people &amp; those on lower incomes to finance home ownership &amp; this has exacerbated the growth of the private &amp; social rented sectors.</p> <p>There is some concern<sup>65</sup> that the new HMO DPD would limit the number of houses in multiple occupation through the removal of the PDRs. This then might have negative effects on younger people &amp; those on lower incomes, such that there could be an increase in poverty or social exclusion. The DPD does not seek to limit the number of HMOs that might be needed, rather to ensure that any increase does not adversely affect amenity and character. Policy HMO3 seeks to avoid localised intensification by avoiding sandwiching - no significant effects on social inclusion and overall, neutral effects.</p>	<b>0</b>
<b>4: Improve health, reduce health inequalities and promote active living</b>	<p>The provision of good quality housing, amenity, accessibility to services/facilities &amp; green/open spaces, active travel &amp; lifestyle all contribute to good health.<sup>66</sup> Overlooking and loss of privacy resulting from intensification of use can affect wellbeing of residents with negative effects. Policy HMO3 seeks to avoid sandwiching, thus reducing the risk of overlooking &amp; loss of privacy with likely minor positive effects.</p>	<b>+</b>
<b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b>	<p>The policy does not seek to limit the number of HMOs but rather to minimise potential adverse impacts on amenity. Overall, this policy will be not applicable or neutral as it does not reduce the effects of HMO1 but rather provides further mitigation.</p>	<b>0</b>
<b>6: To reduce crime, disorder and fear of crime</b>	<p>As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales &amp; Northern Ireland overall figure. The most common crimes in Coventry are violence &amp;</p>	<b>++?</b>

<sup>64</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<sup>65</sup> For example, <https://sturents.com/news/2022/02/16/coventry-council-considers-article-4-direction/2840/>

<sup>66</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

	<p>sexual offences.<sup>67</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for any increased antisocial behaviour. Avoiding localised intensification by avoiding sandwiching of HMOs may have major positive effects on reducing the likelihood of anti-social behaviour as communities will be more balanced – some uncertainty of precise significance as depends on specific locations.</p>	
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	<p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; that they meet with various requirements that are more likely to limit the potential for negative effects on cultural &amp; recreational activities.</p> <p>The Council has recognised the possibilities for cumulative adverse effects &amp; made provision for requirements to mitigate negative effects, including on cultural &amp; recreational facilities. Therefore, potential negative effects mitigated by policy requirements &amp; overall, neutral effects.</p>	<b>0</b>
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	<p>Policy HMO3 seeks to avoid adverse impacts on amenity &amp; it is the deterioration of the visual amenity that can have particular negative effects where there is intensification. The potential negative effects from sandwiching are mitigated by policy requirements &amp; overall, likely minor positive effects as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.</p>	<b>+</b>
	<p>HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs &amp; there is a need to carefully convert them taking into account historic assets &amp; also with regard to climate change (see also later SA No 13). However, Policy HMO3 is concerned with avoiding localised intensification &amp; the effects on the historic environment &amp; its setting is less applicable or negligible as depends upon the specific location.</p>	<b>0</b>
<b>9: Biodiversity</b>	Scoped out	
<b>10: Promote a high quality built environment by</b>	The avoidance of sandwiching is not directly related to this SA objective and not applicable or neutral effects indicated.	<b>0</b>

<sup>67</sup> <https://crimerate.co.uk/west-midlands/coventry>

<b>improving design and layout and encourage local distinctiveness and stewardship of local environments</b>		
<b>11: Enhance quality and minimise air, soil, water, light and noise pollution levels</b>	<p>SA objectives relating to contaminated land, water quality, and soils are not applicable. Some concern has been raised about nuisance odour, particularly associated with management of waste. Policy HMO3 requires proposals to avoid sandwiching which can have implications for adverse impacts associated with poor refuse disposal/storage through accumulation of waste in a specific area.</p> <p>Poor air quality in the UK is mostly associated with road traffic &amp; the whole of the Coventry City administrative area is declared as a AQMA in consideration of nitrogen dioxide concentrations<sup>68</sup>. Concern has been raised about the increase in numbers of cars &amp; parking for HMOs – all of which could have implications for air quality.</p> <p>The potential negative effects for nuisance odour &amp; air quality from road traffic associated with cumulative effects from sandwiching are mitigated by the policy requirements that avoid intensification. Therefore, overall, likely minor positive effects as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.</p>	+
<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	0

<sup>68</sup> [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=69](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=69)

<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive & unsatisfactory waste generation & storage associated with HMOs. Policy HMO3 seeks to avoid localised intensification thus avoiding the potential for issues associated with poor waste management.	<b>+</b>
	Therefore, overall, likely minor positive effects as there will be a cumulative positive effect over time as the provision of HMOs is more proactively managed.	
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. Policy HMO3 only seeks to avoid sandwiching; it does not affect the ability of HMOs to meet local needs locally – not applicable, neutral effects.	<b>0</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	
<b>20: Education &amp; Training</b>	Scoped out	

<b>Policy HMO4 Amenity &amp; Design</b>		
<b>Assessment of Effects</b>		
<b>Sustainability Appraisal Objective</b>	<b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	

<b>1: Improve accessibility to &amp; use of basic services &amp; amenities to all residents</b>	The provision of HMOs will not have any effects on improving accessibility or make access more affordable; details of design requirements set out in HMO4 are not directly relevant – therefore, neutral effect.	<b>0</b>
<b>2: Enable vibrant and inclusive communities that participate in decision-making</b>	The details of design requirements set out in HMO4 are not directly relevant & therefore, negligible or neutral effects indicated.	<b>0</b>
<b>3: Reduce social exclusion and poverty</b>	The details of design requirements set out in HMO4 are not directly relevant & therefore, negligible or neutral effects indicated.	<b>0</b>
<b>4: Improve health, reduce health inequalities and promote active living</b>	The provision of good quality housing, amenity, accessibility to services/facilities& green/open spaces, active travel & lifestyle all contribute to good health. <sup>69</sup>	<b>++</b>
	All the requirements set out in criteria (a) – (f) in Policy HMO4 are likely to have positive effects on health and wellbeing, including considerations of suitable space for households, no adverse nuisance impacts from increased noise, disturbance or activities, safe & secure external space, and suitable waste management. Major positive effects that will be cumulative in the longer term.	
<b>5: Provide decent and affordable housing for all, of the right quantity, type, tenure &amp; affordability for local needs</b>	The changing demographic & economic climate has identified a growing need for HMOs. The DPD takes a proactive approach to manage the potential negative effects that could arise as this need is met. The requirements in HMO4 for suitable amenity and design ensure that the SA objectives for housing are supported.	<b>++</b>
	The DPD is responding to an identified need in housing & thus, overall major positive effects indicated as decent housing will be ensured through the policy requirements for accommodation spaces – and this will be cumulative in the longer term.	
<b>6: To reduce crime, disorder and fear of crime</b>	As of 2022, the crime rate in Coventry is 15% higher than the West Midlands and 34% higher than the England, Wales & Northern Ireland overall figure. The most common crimes in Coventry are violence &	<b>+</b>

<sup>69</sup> For example: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

	<p>sexual offences.<sup>70</sup> It is understood that some residents were concerned during the Issues &amp; Preferred Option DPD consultation about increases in anti-social behaviour associated with HMOs.</p> <p>The more proactive management of proposed HMOs is more likely to ensure that HMOs are in suitable locations &amp; criterion (e) in Policy HMO4 specifically requires the design of the external space to be safe &amp; secure – with minor positive effects.</p>	
<b>7: To encourage increased cultural and recreational activities across all sectors of the community</b>	The detailed requirements for design set out in Policy HMO4 are not directly relevant or applicable to SA objectives on culture & recreation – neutral effects.	<b>0</b>
<b>8: To protect and enhance landscapes, local countryside, open spaces and the historic environment</b>	Policy HMO4 includes requirements in criterion (b) to ensure no demonstrable adverse impact on character. Landscape and open spaces are protected by other plan policies, for example, DE1 High Quality Design & R2 City Centre. Therefore, potential negative effects mitigated by policy requirements & overall, neutral effects.	<b>0</b>
	HE raised some concern about ensuring that the historic environment and its setting is considered within the SA, since the stock of historic buildings is important for HMOs & there is a need to carefully convert them taking into account historic assets & also with regard to climate change (see also later SA No 13). It is suggested that the Council consider adding “and historic assets & their setting” to criterion (b) in HMO4 to make explicit that the historic environment is included in character & appearance of an area. Nonetheless, the historic environment is addressed through other CLP Policies, such as DE1, HE1 -2, & R2. Therefore, likely neutral effects through mitigation in policy wording, but some uncertainty as to precise significance with regard to the historic environment.	<b>0?</b>
<b>9: Biodiversity</b>	Scoped out	
<b>10: Promote a high quality built environment</b>	Criterion (b) Policy HMO4 requires no demonstrative adverse impact on character. Proposals will be required to meet with other CLP policies, including DE1 High Quality Design – therefore, neutral effects.	<b>0</b>
<b>11: Enhance quality and minimise air, soil,</b>	SA objectives relating to contaminated land, water quality, and soils are not applicable.	<b>+</b>

<sup>70</sup> <https://crimerate.co.uk/west-midlands/coventry>

<b>water, light and noise pollution levels</b>	<p>Some concern has been raised about nuisance odour, particularly associated with management of waste. Criterion (f) of Policy HMO4 requires proposals to include provision of suitably designed refuse bin storage that is not visible from the public realm.</p> <p>Criteria (b) and (d) make specific requirements regarding nuisance noise thus avoiding potential adverse effects.</p> <p>Therefore, minor positive effects as the potential for negative effects on nuisance odour &amp; noise have been mitigated through policy requirements, &amp; there will be cumulative positive effects in the longer term.</p>	
<b>12: Flood Risk</b>	Scoped out	
<b>13: To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on climate change objectives. Measures for adapting to, and mitigating for, the effects of climate change are addressed through other CLP policies, including DS3 Sustainable Development, EM1 Climate Change Adaptation, EM2 Building Standards, & EM3 Renewable Energy Generation.	<b>0</b>
<b>14: To minimise use of water, minerals and other natural resources</b>	The proposed changes to the management and planning of HMOs is unlikely to have any significant effects on natural resources objectives. Measures for addressing the more efficient use of natural resources are considered through other CLP policies, including DS3 Sustainable Development.	<b>0</b>
<b>15: To reduce travel by car and air</b>	The Council will consider the accessibility to local amenities & public transport when assessing HMO proposals such that it is possible that HMOs will be favoured in more sustainable locations such that any increase in car usage can be minimised.	<b>0</b>
<b>16: To reduce pollution and waste generation and increase levels of reuse and recycling</b>	<p>Waste management in the Coventry area is addressed through CLP Policy EM7. Concern has been raised about excessive &amp; unsatisfactory waste generation &amp; storage associated with HMOs.</p> <p>Policy HMO4 includes criterion (f) that requires external refuse bin storage to be provided externally with a suitably design structure &amp; not visible from the public realm.</p> <p>Therefore, potential for minor positive effects as the potential for negative effects associated with wastes have been mitigated through policy requirements, &amp; managed more proactively such that there will be cumulative effects in the longer term. .</p>	<b>+</b>



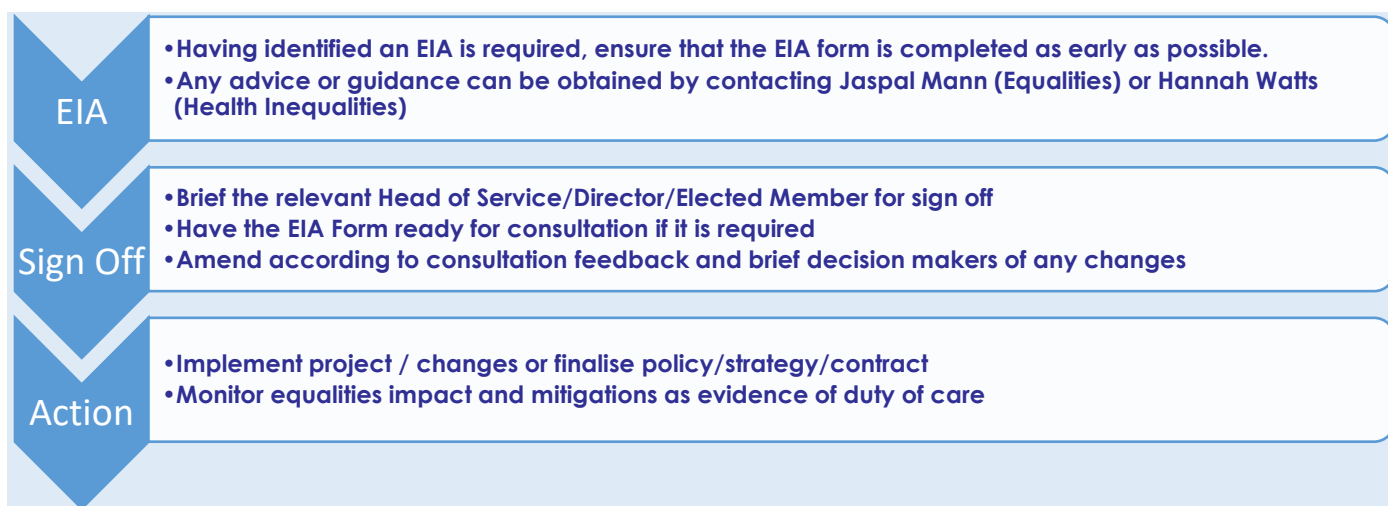
<b>17: To meet local needs locally</b>	One of the SA objectives for meeting local needs is to provide appropriate housing for local needs. Policy HMO4 is not directly relevant to meeting local needs locally & neutral effects indicated.	<b>0</b>
<b>18: Economy</b>	Scoped out	
<b>19: Employment</b>	Scoped out	
<b>20: Education &amp; Training</b>	Scoped out	

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## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Title of EIA</b>		<b>Homes in Multiple Occupation (HMO) DPD Consultation Draft (Regulation 18)</b>
<b>EIA Author</b>	Name	<b>Rob Haigh</b>
	Position	<b>Senior Planning Policy Officer</b>
	Date of completion	<b>07/02/2023</b>
<b>Head of Service</b>	Name	<b>Rob Back</b>
	Position	<b>Strategic Lead Planning</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*) *Development Plan Document for Homes in Multiple Occupation (HMO).*

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

The HMO (DPD) adds further complementary policy details to the Local Plan which was adopted on 6<sup>th</sup> December 2017 and for which EIA was undertaken. DPDs introduce new policy and provide further detail to enable and manage future development in the city.

Delivering sufficient land to enable homes to be built over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. The aim of this DPD is to set out the detailed policy framework that will be used for the determination of HMO planning applications in Coventry. The policies contained within the DPD will provide further detail to the strategic policies set out in the Council's Local Plan and City Centre Area Action Plan and national policy as set out in the National Planning Policy Framework.

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

Applicants who are required to submit planning applications for HMO schemes, agents and individuals who may want to let private housing and those members of the community who need to access HMOs. The Government defines a HMO<sup>1</sup> as:

*" Your home is a house in multiple occupation (HMO) if both of the following apply:*

- at least 3 tenants live there, forming more than 1 household*
- you share toilet, bathroom or kitchen facilities with other tenants*

*Your home is a large HMO if both of the following apply:*

- at least 5 tenants live there, forming more than 1 household*
- you share toilet, bathroom or kitchen facilities with other tenants*

*A household is either a single person or members of the same family who live together. A family includes people who are:*

- married or living together - including people in same-sex relationships*
- relatives or half-relatives, for example grandparents, aunts, uncles, siblings*
- step-parents and step-children".*

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

Coventry City Council Planning Policy Service.

<sup>1</sup> [www.gov.uk/private-renting/houses-in-multiple-occupation](http://www.gov.uk/private-renting/houses-in-multiple-occupation)



## SECTION 2 – Consideration of Impact

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

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

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

### 2.1 Baseline data and information

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

The HMO DPD was formulated using detailed evidence including a bespoke evidence gathering document and an independent study. The HMO DPD will be independently examined by a Planning Inspector to ensure that its policies are robust and formulated using appropriate evidence before it can be adopted. Further detail on the HMO DPD and the evidence base can be found here:

[www.coventry.gov.uk/planning-policy](http://www.coventry.gov.uk/planning-policy)

This DPD sets out the policy position in managing and guiding decision makers in determining HMO planning applications across 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	Nature of impact and any mitigations required
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## EQUALITY IMPACT ASSESSMENT (EIA)



	P, N, PN, NI or ID	
Age 0-18	<b>P</b>	HMOs are aimed at those whose needs are not met by the market. Whilst those aged 0-18 would generally not be directly able to access HMO products, many will live in households where their parents and carers will not be able to afford open market homes and thus they will indirectly benefit from the policies. 22.5% of children live in low income families which is above the regional and national average (20.2% and 17% respectively) <sup>2</sup>
Age 19-64	<b>P</b>	HMO housing is aimed at those whose needs are such that they cannot or are unable to buy in the open market for a variety of social and economic reasons. The average gross disposable household income for Coventry is below the regional and national average (£15,353 per head per annum compared to £18,222 and £21,609 respectively in 2018), and the average house price was £185,000 (October 2019 to September 2020 figures). Currently the claimant count stands at 15,320 (ONS July 2021) compared to 8,000 in March 2020. The DPD has the potential for improvement of the quality of HMOs. HMOs have the potential to benefit the wider local community by reducing social and environmental factors associated with high concentrations of HMOs relating to noise, rubbish and general upkeep.
Age 65+	<b>P</b>	See above in terms of disposable household income and average house prices. Some HMO products (as defined by the Government in the National Planning Policy Framework) will be applicable depending upon the individual / household circumstances
Disability	<b>ID</b>	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Gender reassignment	<b>ID</b>	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Marriage and Civil Partnership	<b>ID</b>	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Pregnancy and maternity	<b>ID</b>	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Race (Including: colour, nationality,	<b>ID</b>	No direct impact although Coventry has a diverse population and affordable products will be applicable depending upon the individual / household circumstances

<sup>2</sup> <https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-201415-to-201819>

## EQUALITY IMPACT ASSESSMENT (EIA)



citizenship ethnic or national origins)		
Religion and belief	<b>ID</b>	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Sex	<b>ID</b>	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Sexual orientation	<b>ID</b>	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances

### 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> <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	
2.3a What HIs exist in relation to	<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> </ul>	

## EQUALITY IMPACT ASSESSMENT (EIA)



<p>your work / plan / strategy</p>	<ul style="list-style-type: none"> <li>Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation</li> </ul>
	<p>Response:</p> <p>The HMO DPD supplements and provides complementary policies to Policy H11 of the adopted Local Plan which was subject to a 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="http://www.coventry.gov.uk/localplan">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 HMOs. See <a href="http://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd">www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd</a></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 style="padding-left: 40px;">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>



## EQUALITY IMPACT ASSESSMENT (EIA)



### 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> </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 access to a range of HMO products to meet a range of needs and circumstances is a key aim of the HMO DPD which provides the further detail to ensure that policies within the DPD can be delivered.

The HMO DPD which seeks to safeguard the amenities of future occupants and the local community and meets relevant housing standards. The HMO DPD will have a direct linkage with the Environmental Health department and licencing of relevant HMOs. For example, HMOs may have a higher risk of fire and overcrowding. Its important that residents of HMOs have access to decent facilities. The HMO DPD will accord with Local Plan policy H11 which addresses HMOs in Coventry. Planning policy resists the loss of local character and family housing. All members of the population including young, single people, care leavers, homeless people, students may be more satisfied given the impact of managing HMOs to deliver accommodation of a higher quality than existing for all HMOs.

Whilst the DPD cannot directly influence the behaviour of the end-user of the product (as this is for the private landlords who deliver the products to determine in terms of prioritisation and access to the product), Policy H11 of the Local Plan (upon which this DPD provides a detailed suite of complementary policies) sets the strategic context for appraising and assessing HMOs across the city. For example, Policy H11 sets out a suite of

criteria upon which HMO schemes are assessed. However, the policies in the HMO DPD provide a more detailed issue specific response to the challenges HMOs can represent. These include strategic issues such as concentrations, sandwiching and thresholds. Other localised issues include:

- **Reduced social cohesion** resulting from the short-term nature of residencies involved with HMOs which may involve younger people overall. demographic imbalance.
- **Reduced housing choice** resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation);
- **Reduced community engagement** from residents resulting from an increase in the transient population of an area;
- **Noise and disturbance** resulting from intensification of the residential use and/or the constantly changing nature of households;
- **Overlooking and loss of privacy** resulting from poorly considered internal layouts and intensification of use;
- **Detriment to visual amenity** resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking;
- **Reduced community services** resulting from a shift in the retail/business offer towards a narrower demographic such as the proliferation of Hot Food Takeaways; and
- **Highway safety concerns** resulting from congested on-street parking and poor waste management.

It is considered that the HMO DPD would have an overall positive impact for landlords, tenants, residents and businesses, by virtue of the potential improvement to the quality of HMOs and the management of them by bringing them within the planning systems regulatory control. The assessment of planning applications for HMOs will provide the opportunity for the assessment of the potential impacts on amenity, city character and issues arising from concentrations of HMOs. In addition, there are potential benefits arising from the increased choice of quality housing.

### 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 this document provides the detail to ensure the Local Plan policies can be delivered effectively.

The HMO DPD contains four bespoke policies in addition to the strategic Local Plan policy H11 and has the underlying principle to deliver sustainable development to secure a better quality of life for everyone now and for future generations. Every policy in the DPD is intended to positively impact all residents of Coventry, regardless of gender, faith, race, disability, sexuality, age, rural isolation and social deprivation.



It will promote improved equal access to opportunities throughout the city. All the policies within the DPD contribute towards achieving sustainable development and balanced communities.

Planning applications for HMOs will be considered based on their individual planning merit on a case by case basis, in a manner that is fair to all sections of the community with due regard on potential impact on amenity. By bringing the consideration of all HMOs within the remit of the planning system enables the involvement of the public in the planning decision making process.

Large HMOs already require planning permission and licencing from the environmental health services. The proposal is an extension of the planning permission requirement to cover all HMOs. It is difficult to assess differential impacts arising for the implementation of a HMO DPD which will require greater control and assessment criteria for all HMO proposals. The Councils planning team does not collate any data on equalities profiles of private landlords.

By requiring all HMO proposals to be assessed against a clear suite of bespoke policies provides the opportunity for people to make informed representations through the planning application process. The HMO DPD advocates higher quality housing and management which helps to promote good relations between different communities in that it addresses some of the negative impacts of the over concentration of HMOs (refer to the HMO Article 4 evidence base). However some landlords, having to submit a planning application for new HMOs may continue to creating HMOs without the benefit of a planning application in breach of planning legislation. This will be managed, as with all potential planning contraventions, through the planning enforcement service.

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

The Local Plan already includes monitoring indicators which keep track of HMO completions delivered annually. These will be linked to this DPD for continuity. However, the DPD provides clarity to the process which will assist with more efficient delivery of HMOs. However, there is scope to improve the monitoring process, we will be looking at this in more detail as the DPD is progressed through the regulatory process.

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

No.

## EQUALITY IMPACT ASSESSMENT (EIA)



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:**

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

## EQUALITY IMPACT ASSESSMENT (EIA)



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>Rob Back</b>	<b>Date: 07.02.23</b>
<b>Name of Director:</b> <b>Andrew Walster</b>	<b>Date sent to Director: 08.02.23</b>
<b>Name of Lead Elected Member:</b> <b>Councillor D Welsh</b>	<b>Date sent to Councillor: 17.02.23</b>

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

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# Coventry City Council

## Homes in Multiple Occupation (HMO)

### Development Plan Document (DPD)

#### Regulation 18: Consultation Statement

March 2023

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## 1. Introduction

1.1 The Council is in the process of preparing a Homes in Multiple Occupation (HMO) Development Plan Document (DPD). As part of this process, the Council undertook a consultation on the draft DPD from 20 September 2022 until 15 November 2022 in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012.

1.2 The purpose of this consultation statement is to set out how the Council undertook this consultation and the findings that emerged from it. The following document summarises how the Council consulted, who was invited to make representations, the comments that were received and how we have responded to these in the Draft HMO DPD (submission version).

1.3 The Council received 53 separate responses resulting in 190 individual representations during the Regulation 18 consultation. This statement summarises the main comments received and the Council response to them. It identifies what consultation was undertaken, when, with whom and how it has influenced the submission version of the plan (Regulation 19).

1.4 This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012 (Clause 22) (1)(c)(i-iv). This states that a Consultation Statement has to be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18;
- How those bodies and persons were invited to make representations under Regulation 18;
- A summary of the main issues raised by the representations made pursuant to Regulation 18; and
- How any representations made pursuant to regulation 18 have been taken into account.

1.5 The Consultation Statement will assist the Inspector at the Examination in determining whether the Councils DPD complies with the requirements for public participation and government guidance. The report shows that the consultation carried out by the Council has complied with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). The report also shows that public

involvement was carried out following the approach set out in the Councils Statement of Community Involvement (SCI)<sup>1</sup>.

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<sup>1</sup> [https://www.coventry.gov.uk/downloads/file/37080/statement\\_of\\_community\\_involvement\\_july\\_2021](https://www.coventry.gov.uk/downloads/file/37080/statement_of_community_involvement_july_2021)

## 2. Consultation Approach

2.1 There is considerable flexibility open to Local Planning Authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, in respect of consultation, and with the commitments made within the Councils Statement of Community Involvement (SCI).

### **Promotion of the consultation**

2.2 Consultation on the HMO DPD (Regulation 18) document took place between 20 September 2022 until 15 November 2022.

2.3 The Regulation 18 consultation was promoted through a variety of means. These included:

- Formal notifications of the consultation were sent via the Councils consultation management system to the specific and general consultation bodies set out in the SCI as well as other individuals and organisations on the Councils Local Plan consultee database that requested to be notified.
- The Councils Planning Policy webpage was used to the draft Local Plan Reg 18 consultation event. This gave people access to information on the consultation as well as the Reg 18 draft HMO DPD and the supporting documentation.
- The HMO DPD and supporting documents were made available online and in hard copy at the Council House and public libraries. Libraries have specific facilities to enable disabled users to access the consultation material including large print screens.
- Statutory notices were placed in the Coventry Telegraph newspaper on 29 September 2022 (see Appendix 1).
- Media press release occurred in the local news on 23 September 2022 and on the Councils website homepage and 'Lets Talk' website homepage.
- Public notices were distributed across the city to raise awareness of the DPD and consultation.
- A summary leaflet was made available at libraries, Council offices and the consultation events. This leaflet set out the main themes of the HMO DPD and encouraged people to have their say on the plan and indicated how they could find out more and have their say. (see Appendix 2).
- Social media was also used extensively (see Appendix 4) which included:

## Homes in Multiple Occupation (HMO) Development Plan Document Regulation 18 – Consultation Statement

- 5 separate tweets and Facebook posts on the Councils official social media accounts during the consultation period;
- A bespoke post on the Councils YouTube channel which generated 507 views - <https://www.youtube.com/watch?v=ayTKcgwA5Hc>



 **Coventry City Council**  @coventrycc · 29 Sep 2022 ⋮

Your voice matters.

As part of our Public Consultation process, we want to hear from residents to understand their thoughts on our Article 4 and planning policy proposals.

Want to get involved? Visit one of our drop-in sessions: [orlo.uk/planning\\_consultation](https://orlo.uk/planning_consultation)



ALT

 **Coventry City Council**  @coventrycc · 30 Sep 2022 ⋮

We're hosting drop-in sessions over the next few weeks to hear your thoughts, ideas & concerns on our Article 4 & planning policy proposals as part of our Public Consultation, which is now live.

The next drop-in session is on Oct 1.

Find out more: [orlo.uk/4suw3](https://orlo.uk/4suw3)



ALT

### Consultation events and Hard to Reach Groups

2.4 A comprehensive round of drop sessions were carried out across several public libraries which involved officers answering questions and making available the draft DPD and supporting documents to anyone who attended. These included the following events:

Location	Date and Time
Hillfields Library	27 September 2022, 10am – 12noon
Stoke Library	27 September 2022, 1pm – 3pm
Earlsdon Caranagie Community Library	1 October 2022, 10.30am - 12.30pm
Allesley Park Library	1 October 2022, 2pm - 4pm
Alder Moor Library	4 October 2022, 11am - 1pm
Finham Library	4 October 2022, 2.30pm - 4.30pm
Canley Library	7 October 2022, 10am – 12noon
Central Library	8 October 2022, 1pm - 3pm
Cheylesmore Library	11 October 2022, 9:45am – 11:45am
Jubilee Crescent Library	11 October 2022, 2pm - 4pm
Coundon Library	14 October 2022, 11am - 1pm

2.5 In addition, targeted sessions were organised with hard to reach groups such as asylum seekers, migrants and refugees who were considered to represent a hard to reach group whom the draft DPD may affect. In line with the expectations set out in the SCI, contact was made with the Coventry Council's Migration enabling contact with forums and groups who would be able to help facilitate engagement with the identified hard to reach groups.

2.6 Contact was made with the numerous groups (106) and forums provided by the Councils migration team. Engagement was made with three specific groups and officers attended events/workshops in which the consultation could be discussed and for more information provided to those in attendance. This included the Coventry Refugee and Migrant Centre, Inini Peer Support Group and Carriers of Hope Coventry and the Landlords Forum. Leaflets were left with attendees once the event had taken place.

### Feedback

2.7 Any comments could be provided through a number of means including:

- Comments forms (available both online and hard copy versions).
- Comments could be made online via Inovem<sup>2</sup>, the Councils consultation system which allowed people the time to consider what they wanted to say in their own time.
- Submission of letters and emails.

2.8 A copy of the comments form is contained in Appendix 3.

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<sup>2</sup> <https://coventrycitycouncil.inconsult.uk/HMO/consultationHome>

### 3. Responses to the Consultation

3.1 As a result of the methods outlined in Section 2, 53 responses were received which resulted in 190 representations during the consultation.

3.2 Comments were received from a wide range of people and organisations including statutory consultees, special interest groups, neighbourhood planning groups and individual residents. Organisations concerned with HMOs were represented, as were resident groups.

3.3 From the various library drop-in sessions and online meetings with local community groups, many issues were raised and can be summarised as follows:

**I. Drop in sessions and other engagement work:**

- Reduced social cohesion resulting from the short-term nature of residencies involved with HMOs which may involve younger people overall resulting in a demographic imbalance.
- Reduced housing choice resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation);
- Reduced community engagement from residents resulting from an increase in the transient population of an area;
- Noise and disturbance resulting from intensification of the residential use and/or the constantly changing nature of households;
- Overlooking and loss of privacy resulting from poorly considered internal layouts and intensification of use;
- Detriment to visual amenity resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking;
- Reduced community services resulting from a shift in the retail/business offer towards a narrower demographic such as the proliferation of Hot Food Takeaways; and
- Highway safety concerns resulting from congested on-street parking and poor waste management.

**II. Hard to reach groups:**

As previously mentioned, Council officers attended 3 separate meetings where specific engagement was sought with suggested local hard to reach groups, and the main points raised are as follows:

*The Coventry Refugee and Migrant Centre*

Key points raised included:

- focusing on the fact that any actions taken to limit HMO numbers in the city would have an effect on the hard to reach groups identified.

*Inini Peer Support Group:*

- The group seeks to support people from Black and Asian Minority Ethnic groups, those seeking asylum and refugees with integration. Not all questions raised were of direct relevance to the consultation, with many of the questions concerned with wider issues across the Council of which other services would be responsible for, for example questions around the quality of parks in the city.
- Alleviating the need for HMOs for Migrants, Asylum seeker and refugees by developing accommodation specifically for them in a similar vein to that of Purpose Built Student Accommodation.
- Designating certain areas (those in proximity to the University/City Centre) solely for HMO development in order to contain them in a controlled area, preventing the identified issues from spilling into other areas.

*Carriers of Hope Coventry:*

- An organisation active in supporting refugees, asylum seekers and other migrants.
- Broadly supportive of the intentions underpinning the introduction of the article 4 direction and associated DPD.
- In particular the opportunity to see areas with some of the problems associated with HMOs was welcomed, as was the potential for less pressure on existing housing stocks being eroded away from family dwellings to HMOs.

**Overall results**

3.4 Overall, there were 190 comments received during the consultation via the Councils consultation management system<sup>3</sup>. A summary of the main issues raised included the following:

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<sup>3</sup> <https://coventrycitycouncil.inconsult.uk/HMO/consultationHome>



**III. Significant support for the four policies:**

Respondents expressed support for the policies (either in whole or in part) and the plan objectives. Notable policies attracting support included HMO1 – Homes in Multiple Occupation, HMO3 – Sandwiching and HMO4 – Amenity and Design.

**IV. Mixture of support and objection to the concentration and threshold policy approach:**

- Whilst many expressed support, some respondents wanted to see lower and higher concentration thresholds expressed in policy HMO2 – concentrations and thresholds both in terms of distance and concentration thresholds in certain wards, particularly near the University of Warwick.

**V. Objection to the proposed assessment process:**

- Several respondents objected to para 6.4 and felt this represented a ‘defeatist’ approach by allowing applicants to circumvent the policies and that the wording was too loose and open to interpretation.

3.5 The Council also published a Sustainability Appraisal (SA) Scoping report and an Equalities/Health Impact Assessment (EqIA) report alongside the HMO DPD policy document, with both documents available for public comment. Comments were received in respect of the SA Scoping report from the statutory consultees only and no comments were received in respect of the EqIA report.

**Option Selection**

3.6 The key issues raised by respondents to the consultation are summarised in table 1 below. A comprehensive capture of all respondent comments can be found in Appendix 5.

Table 1: Key Issues

Respondent comments – summary of key issues	Officer response
<b>General</b>	
- How are the number of HMOs calculated?	The number and distribution of existing HMOs is made through the following data sources:

	<ul style="list-style-type: none"> <li>• Council tax records – properties with student exemptions (excluding purpose built student accommodation and self-contained flats).</li> <li>• Licensing records – properties licensed as an HMO.</li> <li>• Planning records – properties with C4 or Sui Generis planning consent or issued with a Certificate of Lawful Development.</li> </ul>
<b>HMO1: Homes in Multiple Occupation</b>	
<ul style="list-style-type: none"> <li>- The policy proposals set out in Draft Policy HM01 are supported.</li> <li>- Increase in HMOs has led to an increase in vehicular parking and elderly individuals feeling isolated and lonely.</li> <li>- Waste left on the public highways and noise being an issue at certain times of the day for existing residents.</li> <li>- Huge changes to the appearance and feel of the areas that they live.</li> </ul>	<p>Policy HMO1, in conjunction with the other policies contained within the DPD and existing adopted Local Plan policies will be used to assess all future prospective HMO planning applications which, will give the Council greater control in terms of how HMOs are managed through the planning system. General support noted and welcome.</p>
<b>HMO2: Concentrations and Thresholds</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Concentrations are already exceeding 10% and the 100m distance threshold is generally supported.</li> <li>- Lower and higher concentrations need to be considered both in terms of distance and concentration thresholds in certain wards, particularly near the University of Warwick.</li> </ul>	<p>The suggestion to use different figures for the concentration and distance thresholds were tested through the Sustainability Appraisal process (please refer to SA report). On balance, and based on the SA testing, it is considered to keep the figures as put forward in the Regulation 18 as they are robust and tested through a Local Plan Examination process in other comparable cities. The Council are unable to apply these policies retrospectively so will only be applied if and when the DPD is adopted. Support noted and welcome.</p>
<b>HMO3: Sandwiching</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Sandwiching only relevant to high density areas and consideration should be given to lower density areas.</li> </ul>	<p>Given the city is a predominately high density area, it is considered that policy HMO3 holds good as set out in the Regulation 18 document. Support noted and welcome.</p>
<b>HMO4: Amenity and Design</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Need to make specific reference to 'Secured By Design' standards.</li> <li>- Character of the neighbourhood can change due to HMO</li> </ul>	<p>It is acknowledged that reference to 'Secured By Design' standards in policy HMO4 would be beneficial and so a proposed change to policy HMO4 and reasoned justification has been made. The Council are unable to apply these policies</p>

<p>increases by way of increased vehicular parking on street and also green space provision should be insisted when HMO applications are made.</p>	<p>retrospectively but will use existing policy mechanisms through the Local Plan and Green Space Strategy to address green space matters. If and when the DPD is adopted, the policies will then be used to determine all future HMO planning applications. In any event, the reference to vehicular parking is already addressed through point e) of the policy. Support noted and welcome.</p>
<p><b>Assessment Process</b></p>	
<ul style="list-style-type: none"> <li>- General support to the approach.</li> <li>- Para 6.4 is effectively 'throwing the towel in' and is totally unacceptable.</li> <li>- Para 6.4 wording is far too loose and open to interpretation. Even where the existing HMO concentration is high, each and every new proposal must be subjected to rigorous planning scrutiny and the views of local residents must be taken into account.</li> </ul>	<p>Agreed to delete para 6.4 as on balance, the para does not provide added value to the way in which HMO applications will be assessed through the planning application process.</p>

# Appendix 1- Statutory notice

facebook.com/coventrytelegraph

THURSDAY, SEPTEMBER 29, 2022 **COVENTRY TELEGRAPH** 39

**Classified**

**Articles Wanted**

**WANTED**  
Mobility scooters  
All models any condition.  
Instant cash payments on  
the day daily collections.  
Also wheel chair access  
vehicles purchased all  
makes urgently needed  
will pay up to  
££££££££  
07768362853

HELLO  
Any item  
any price  
free online  
marketplace.co.uk

**FISH4JOBS**  
phone 0333 321 2601

**Full/Part Time  
Experienced  
Barber  
required**

Location - The Cuttingedge,  
41 Attleborough Road, Nuneaton.  
Happy to discuss hours and  
pay over phone.

Contact Soyabali (Saba) -  
**07772518145** or  
**07583170979**

**FISH4JOBS**  
Start your job search on  
**Fish4jobs.co.uk**

**Property**

**Property Wanted**

**goodmove**  
We buy any house

**WE BUY HOUSES  
FOR CASH**

✓ Sell in days - or in your timescale  
✓ No fees & no obligation  
✓ Any condition or location  
✓ NABP approved & RICS regulated

GET UP TO  
**£30,000**  
CASH ADVANCE

BEST PRICE PAID

Call us **FREE** today for a cash offer - available 24/7  
**0800 031 9071**

goodhousemove.co.uk

**Motors**

**Cars Wanted**

The Easiest Way To Sell Your Car, Van or Bike

**All Vehicles Wanted.co.uk**

A Trusted Family Business  
For More Than 30 Years

New or Old, With/Without MOT - For Best Prices Call or Text Mick Anytime  
**0800 112 34 67 or 07732 767 318**  
Over 50 Google 5 Star Reviews

**Caravans For Sale/Wanted**

**WANTED CARAVANS**  
cash paid  
any age, any size,  
any caravan considered  
0778567739

**Vehicles Wanted**

**WANTED FORD TRANSIT 15 SEATER MINI BUS**  
Year 18 -19.  
0121 7831439 or  
07847 622521

Any item any price free online

marketplace.co.uk  
Your local place to buy and sell

**Public Notices**

**Planning**

**CITY COUNCIL NOTICES**

**COVENTRY CITY COUNCIL  
THE TOWN AND COUNTRY PLANNING  
(GENERAL PERMITTED DEVELOPMENT)  
(ENGLAND) ORDER 2015**

Coventry City Council being the appropriate Local Authority, are consulting upon the introduction of an Article 4 Direction alongside consultations regarding the Homes in Multiple Occupation Development Plan Document. The Article 4 direction shall be introduced under Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015.

The Direction proposes that development of the type listed below under part one should not be undertaken unless planning permission is granted by the Local Planning Authority when proposed within the area shown in part two.

A copy of the proposed order and area to which the order relates, is available to view and comment upon via the Local Authorities Online Public Consultation platform at <https://www.coventry.gov.uk/planning-policy/planning-policy-consultations> and available to view and comment upon at The Council House, Earl Street, Coventry, CV1 5RR and the following libraries: Hillfields Library, 8 Victoria Street, CV1 5LZ Stoke Library, Kingsway, CV2 4EA Earlsdon Carnegie Community Library, Earlsdon Avenue North, CV5 6FZ Allesley Park Library, Allesley Park Neighbourhood Centre, Whitaker Road, CV5 9JE Aldermoor Library, Acorn Street, CV3 1DP Finham, Finham Green Road, CV3 6EP Canley Library, Prior Dream Walk, CV4 8FT Central Library, Smithford Way, CV1 1FY Chylesmore Library, Chylesmore Community Centre, Poitiers Road, CV3 5JX Jubilee Crescent Library, Jubilee Crescent Community Centre, Jubilee Crescent, CV6 3EK Coundon Library, Moseley Avenue, CV6 1HT and Foleshill Library, Broad Street, CV6 5BG

A period of consultation is now underway between the dates of 20th September and 15th November 2022 within which representations may be made upon the proposed order to the Local Planning Authority. Any representations made during this time will be considered by the City Council when confirming the Article 4 Direction. Should the Article 4 Direction be introduced, this shall take effect on the 20th September 2023.

**PART ONE**

Part 3 of Schedule 3 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)  
Class L (b)  
Development consisting of a change of use of a building from a use falling within Class C3 (dwellinghouses) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 as amended, to a use falling within Class C4 (houses in multiple occupation) of that Schedule.

**PART TWO**

Properties within the wards as illustrated by the Map below (Fig 1) ARE SUBJECT to this direction. The following are wards are subject to this direction: Chylesmore, Earlsdon, Foleshill, Lower Stoke, Radford, Sherbourne, St Michaels, Upper Stoke, Wainbody, Westwood and Whoberly.

1: Wards subject to this direction  
Rob Back, Strategic Lead - Planning  
29.9.22

**CITY COUNCIL NOTICES**

**TOWN AND COUNTRY PLANNING  
(DEVELOPMENT MANAGEMENT  
PROCEDURE) (ENGLAND) ORDER 2015 -  
NOTICES UNDER ARTICLE 15  
PLANNING (LISTED BUILDINGS AND  
CONSERVATION AREAS) ACT 1990 -  
NOTICES UNDER SECTION 67 & 73**

Notice is given that the following planning applications have been made.

Application reference: S73/2022/2363 Site address: Unit 8-9, Central Six Retail Park, Warwick Road Proposed development: Submission of details to vary condition 10-servicing hours: imposed on planning permission S73/2022/0751 Reason: The proposal is classified as a major development.

Application reference: HH/2022/2435 Site address: 20 Central Avenue Proposed development: First floor side and rear extensions and loft conversion Reason: The proposal may affect the character or appearance of a Conservation Area.

Application reference: FUL/2022/2325 Site address: 10 Melville Road Proposed development: Conversion of 6-bedroom house in multiple occupation (HMO) into 9-bedroom, 7-person HMO Reason: The proposal may affect the character or appearance of a Conservation Area.

Computers are available at the Customer Service Centre, Broadgate House, Broadgate, Coventry CV1 1FS - Opening times: 9.00am-5.00pm, Monday-Friday (excluding public holidays) where you can view the plans and any other documents submitted or at [www.coventry.gov.uk/planningappeal](http://www.coventry.gov.uk/planningappeal).

Any representations about these applications must be made within 21 days of today's date. We do not publish neighbour comments online although we may refer to them within the case officer report and redacted comments will be made available on request. Full details of our Planning Privacy Notice can be found at: [https://www.coventry.gov.uk/info/107/planning\\_and\\_development/3212/planning\\_privacy\\_notice](https://www.coventry.gov.uk/info/107/planning_and_development/3212/planning_privacy_notice).

To find out more about the planning process and how to comment please visit [www.coventry.gov.uk/howtocomment](http://www.coventry.gov.uk/howtocomment)

Rob Back, Strategic Lead for Planning  
Date 29.09.22

**Public Notices**

**national highways**

**ROAD TRAFFIC REGULATION ACT 1984 -  
SECTION 141(1)(a)  
THE A423 AND A45 TRUNK ROADS  
(RYTON-ON-DUNSMORE, WARWICKSHIRE)  
(CONNECTING ROADS) (TEMPORARY  
PROHIBITION OF TRAFFIC) ORDER 2022**

NOTICE IS HEREBY GIVEN that National Highways Limited (Company No. 9346363) has made an Order on the A423 and A45 Trunk Roads, at Ryton-on-Dunsmore, in the County of Warwickshire, to allow cyclical maintenance works to be carried out. The effect of the Order will be to close, at different times, -

- (1) the slip road leading from the eastbound carriageway of the A45 to the roundabout junction with the A423 Oxford Road and Hillman Way, at Ryton-on-Dunsmore;
- (2) the link road leading from the westbound carriageway of the A45 to the link road described in (1) above; and
- (3) the slip road leading to the westbound carriageway of the A45 from the roundabout described in (1) above.

The work will be carried out overnight between 21:00 hours and 06:00 hours and is expected to start on Monday 10 October 2022 and continue for four nights. The Order will come into force on 3 October 2022.

Vehicles being used by police, fire and rescue authority or ambulance purposes, and vehicles being used in connection with the works or for winter maintenance purposes will be exempt from the closures.

Diversion routes via alternative junctions of the A45 and the A423 will be signed.

For more information, please contact Marcus Peart on 07764 972 107.

Karen Eustace, an Officer in National Highways Limited. National Highways Limited (Company No. 9346363) registered office: Bridge House, Walnut Tree Close, Gulkford, GU1 4LZ. A Company registered in England and Wales.

**24/7**

marketplace.co.uk

## Appendix 2 – Summary leaflet

# Homes in Multiple Occupation Consultations. *Have your say!*

20 SEPTEMBER 2022 – 15 NOVEMBER 2022

**A Home in Multiple Occupation (HMO) is defined as a property rented to at least three people who are not from one 'household' (e.g., a family) but share facilities such as a bathroom and kitchen. HMOs meet a variety of needs for private rented housing, ranging from young professional 'house-shares' and students wanting to live off campus, as well as providing a vital source of housing supply for people on lower incomes as well as a range of other reasons. For many people, HMOs provide a practical and affordable housing option that meets their housing needs. They provide an important contribution to peoples' housing choice.**

- With the city's growing population, there is a need to ensure that new development supports thriving communities by ensuring the right mix of housing types in a neighbourhood, securing appropriate design, and supporting well managed properties. Some HMOs are purpose-built, e.g., student accommodation, but many are created through the conversion of buildings. Within areas of Coventry where there are a lot of HMOs there are increasing concerns about the changing nature of communities and neighbourhoods, and the impact of this change.
- Coventry City Council is looking at introducing some new planning policies which will be used to help decide whether planning applications for HMOs in Coventry are acceptable or not. The policies focus upon issues such as the need for a range of different housing options to serve the community, matters relating to maintaining positive residential environments, and acceptable parking standards to ensure that new HMO developments do not have a negative impact on the surrounding areas. It is the aim of the policy document to ensure that potentially harmful concentrations of HMOs do not arise and that a high standard of accommodation is delivered and maintained.
- However, while this new policy document sets our views on a potential preferred approach, we are seeking views and any input on any alternative approaches that you may want to put forward and what evidence we should consider to support this.
- In conjunction with the Development Plan Document, Coventry City Council will be introducing an 'Article 4 Direction'. Currently, under 'Permitted Development' rules, planning permission is not required for the change of use a family dwelling to a small HMO (less than 6 unrelated occupants in a single dwelling). The introduction of an Article 4 Direction will withdraw these permitted development rights, so planning permission will need to be obtained before the use can be changed. The Article 4 Direction will apply to eleven wards in Coventry which have been identified as having especially high concentrations of HMOs already, so the impacts of further changes would need to be very carefully considered to assess whether or not this might negatively affect the surrounding area.

**Consultations are now under way, and we want to hear from you! Comments can be provided through the consultation platform, accessed via the following link or you can use our comments form [www.coventry.gov.uk/planning-policy/planning-policy-consultations](http://www.coventry.gov.uk/planning-policy/planning-policy-consultations)**

Handwritten forms can be scanned and emailed to us at [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), alternatively, they can be posted (addressed to the **Planning Policy Team**) to **PO Box 15, Council House, Earl Street, Coventry, CV15RR.**

The deadline date for representations to be submitted is 15/11/2022.

# FAQ

○ **What type of policies will the document contain?**

The four draft policies address the key issues that have been raised which will be used when considering HMO planning applications.

---

○ **Can we still convert houses into HMO's?**

Once the new rules are adopted you may need to submit a planning application to change a house into a HMO – this will be the only way can convert a house to a HMO in the 11 wards to which the Article 4 will apply.

---

○ **How will HMO applications be assessed?**

They will continue to be assessed against the policy in the adopted Coventry Local Plan and once adopted, the policies in the HMO DPD. As with all planning applications, other factors will be considered alongside relevant policies.

---

○ **What areas will this affect?**

The Article 4 Direction will apply to the 11 specific Coventry wards only (Cheylesmore, Earlsdon, Foreshill, Lower Stoke, Radford, St. Michaels, Sherbourne, Wainbody, Whoberley, Westwood and Upper Stoke). The policies in the DPD will be applied and used to assess all HMO planning applications across the city.

---

○ **What will happen to existing HMOs?**

The Article 4 Direction will not be applied retrospectively once it comes into force (expected autumn 2023) so any lawful HMOs operating within the 11 specified wards will not need to apply for planning permission.

○ **Do these policies still affect areas outside the areas listed?**

Yes – the HMO DPD policies will apply to HMO planning applications across the city.

---

○ **Will this affect landlords of HMOs?**

Yes – once the Article 4 comes into force, all landlords in the affected wards will have to apply for planning permission if they want to create a new HMO.

---

○ **If a house is already a HMO can it be converted back to a residential home?**

Yes of course however, it may still require planning permission.

---

○ **Will Purpose Built Student Accommodations be affected?**

No – the Article 4 Direction and HMO DPD relate specifically to HMO proposals. Purpose Built Student Accommodation will continue to be considered against the policy in the adopted Coventry Local Plan.

---

○ **When will this policy be introduced?**

The HMO DPD is currently expected to be adopted in autumn 2023. The Article 4 direction is to be introduced as a non-immediate direction; it is expected to be in place by autumn 2023.



## Appendix 3 – Comments form

### Comments Form – Homes in Multiple Occupancy Development Plan Document and Supporting Documents

Comment is now being sought in relation to the Homes in Multiple Occupancy Development Plan Document, Regulation 18: Issues and Preferred Option Consultation Document and associated supporting documents. Please use the form attached to share your comments. Completed forms should be scanned and sent to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), alternatively, completed forms can be posted (addressed to the Planning Policy Team) to PO Box 15, Council House, Earl Street, Coventry, CV1 5RR. The deadline for submissions is 15<sup>th</sup> November 2022.

You should be aware that all submitted information including your name and your comments will be publicly available. Other personal details e.g. private address and email will be kept confidential. For further information please read our privacy statement <https://www.coventry.gov.uk/planning-policy/planning-policy-privacy-notice>

Name:.....  
.....

Address:.....  
.....  
.....

Representing (If Applicable):  
.....  
.....  
.....

Email (Optional):  
.....  
.....

Would you like us to add your email to our consultation database, so you are aware of updates and other planning consultations. (Please tick yes if you consent to us adding your details). Yes

**Which document are you commenting on (please tick).**

- Development Plan Document
- The Article 4 Direction
- Equality Impact Assessment
- Sustainability Appraisal and Habitats Regulations Assessment Screening



## Appendix 4 – Social media analytic report

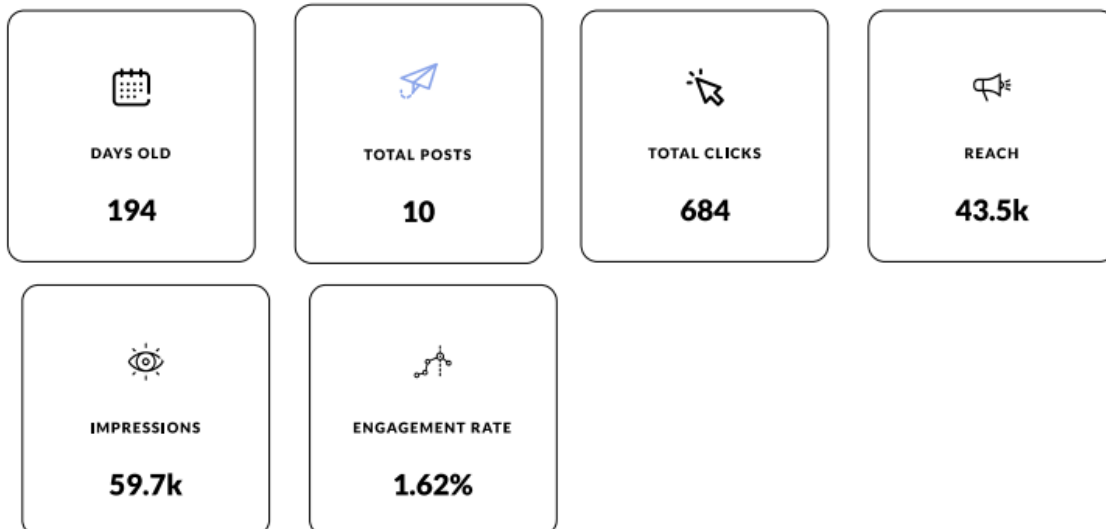
CAMPAIGN REPORT

1 Jul 22 - 11 Jan 23 HMO DPD/A4D

 <b>Twitter</b> 1 Account	<b>0</b> MESSAGES	<b>5</b> POSTS
 <b>Facebook</b> 1 Account	<b>0</b> MESSAGES	<b>5</b> POSTS

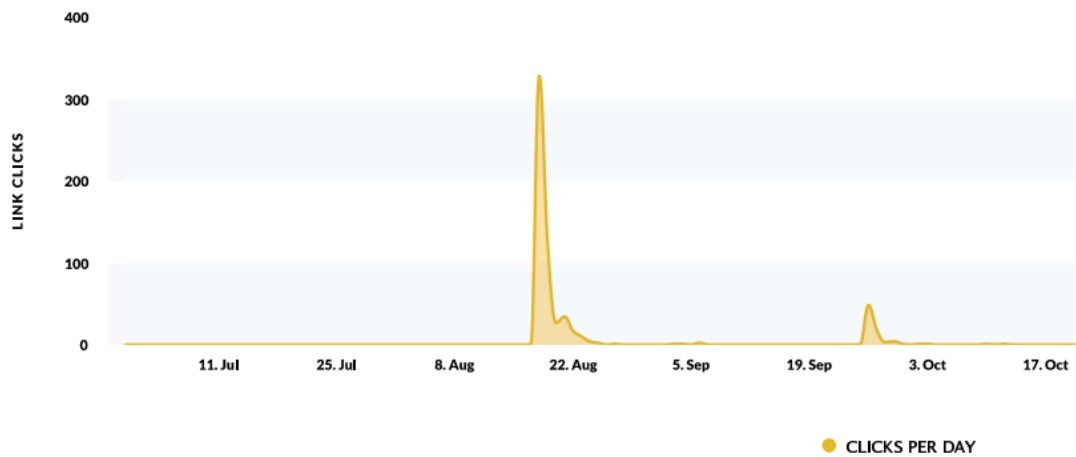
### Overview

ALL NETWORKS TWITTER FACEBOOK



### Link clicks

ALL NETWORKS TWITTER FACEBOOK INSTAGRAM LINKEDIN YOUTUBE

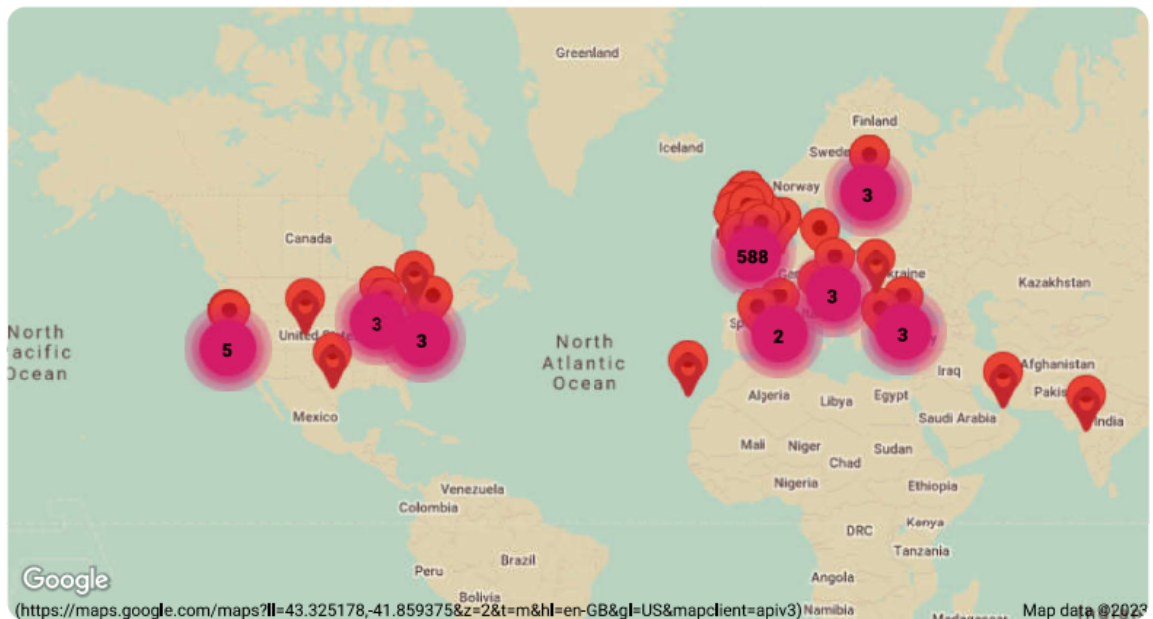


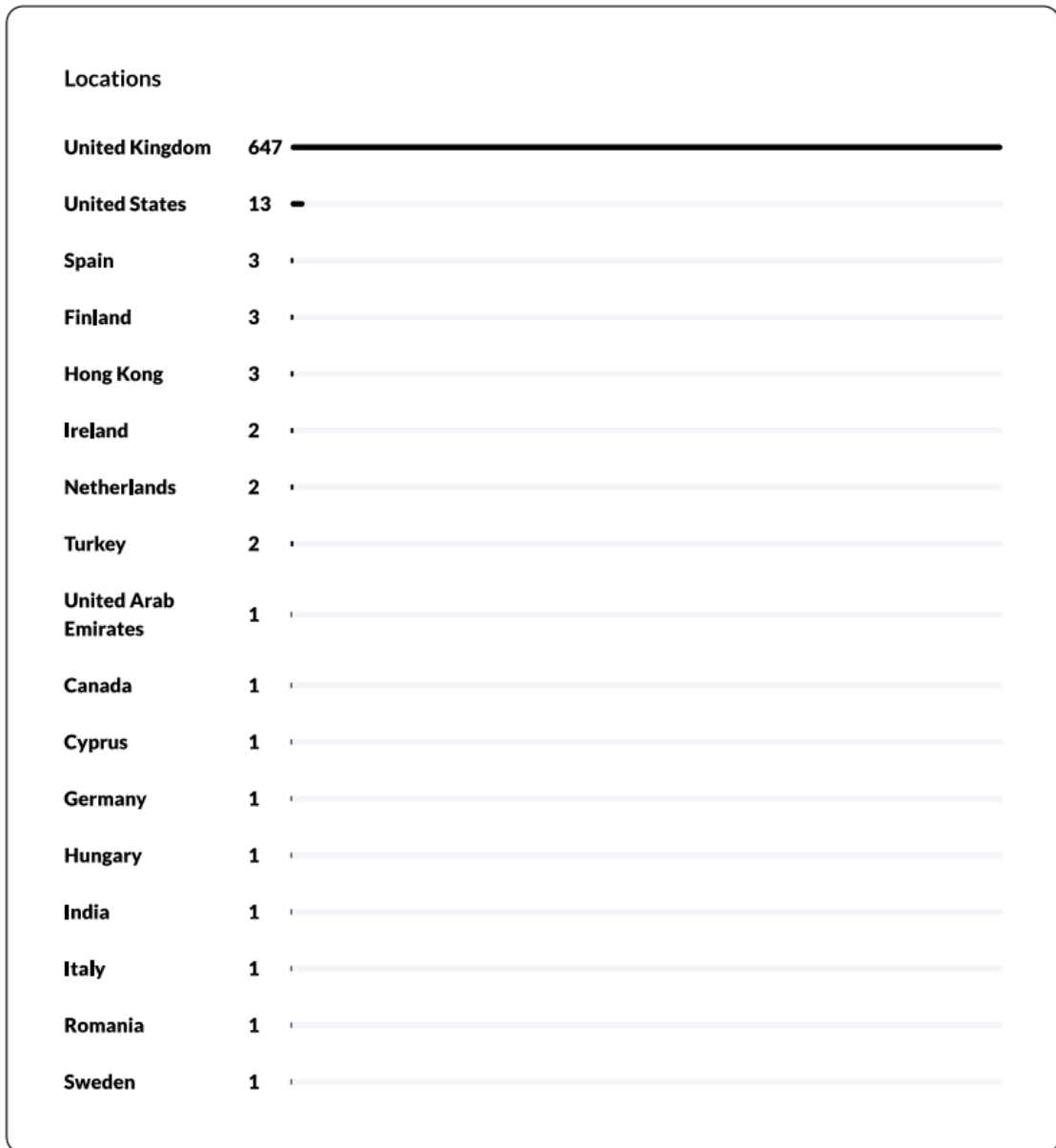
  
TOTAL CLICKS  
**684**

### Make sure it all clicks into place!

Shorten URLs and get the most accurate reporting by using orlo.uk (unsafe:"http://orlo.uk/") tracking links in your posts! Remember, for Instagram and Youtube, no data will be available as posts on these channels can't contain links

### Global Link Clicks





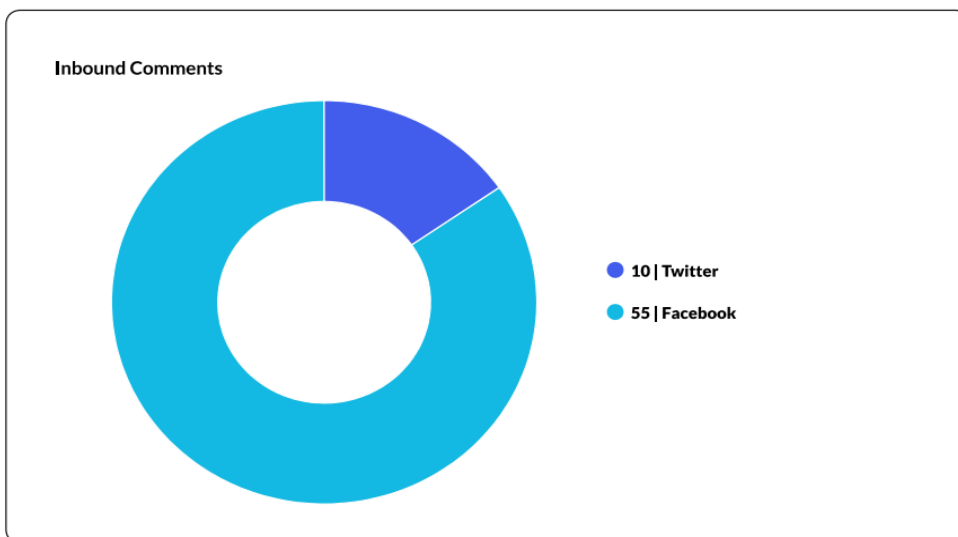
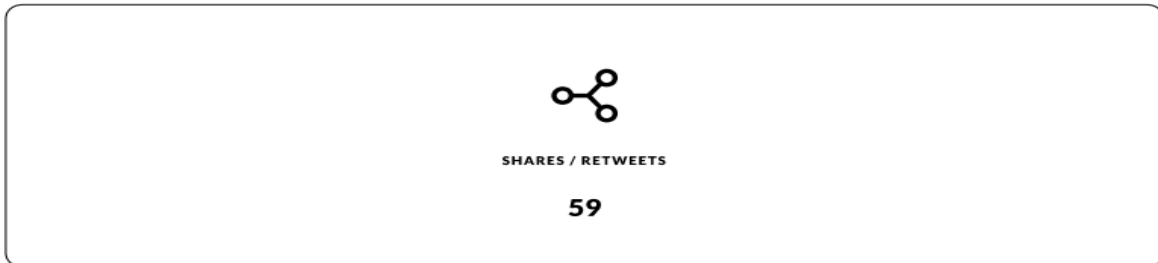
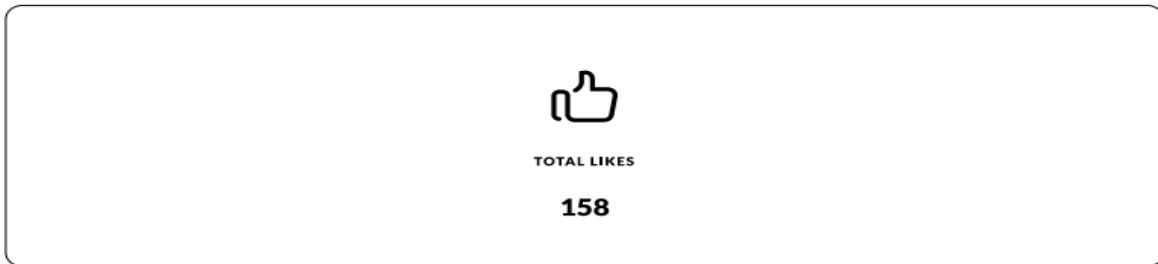
### Posts breakdown

#### Posts by Network

**f Facebook**  
TOTAL REACH







**43.5k**























## Top Posts

ALL NETWORKS TWITTER FACEBOOK INSTAGRAM LINKEDIN YOUTUB

By Clicks 

<p>View post</p> <p>18 Aug</p> <p>coventrycc f 2022  </p> <p>12:46</p> <p>In early September, we'll be holding a public...</p> 	<p>•</p> <p>•</p> <p>•</p>	<p>♥ 91</p> <p>✂ 32</p> <p>💬 40</p> <p>🚩 512</p>	<p>📢 27.7K</p> <p>👁 28.6K</p> <p>🗨 2.36</p>	<p>1</p>  <p>512</p> <p>CLICKS</p>
<p>View post</p> <p>26 Sep</p> <p>coventrycc  </p> <p>11:02</p> <p>Public Consultation on our proposals for...</p> 	<p>•</p> <p>•</p> <p>•</p>	<p>♥ 2</p> <p>✂ 2</p> <p>💬 3</p> <p>🚩 40</p>	<p>👁 1.7K</p> <p>🗨 2.84</p>	<p>2</p>  <p>40</p> <p>CLICKS</p>

 <p>coventrycc  2022                                     12:46</p> <p>In early September, we'll be holding a public...</p>			 4  1  37	 1.9K  2.25	 3 <b>37</b> CLICKS
<p>View post</p> <p>26 Sep</p>  <p>coventrycc  2022                    11:02</p> <p>Public Consultation on our proposals for...</p>			 5  3  2  36	 2.1K  2.2K  2.08	
<p>View post</p> <p>11 Nov</p>  <p>coventrycc  2022                    13:00</p> <p>We want to hear your thoughts, ideas and...</p>			 0  0  0  17	 1.3K  1.4K  1.25	
<p>View post</p> <p>07 Nov</p>  <p>coventrycc  2022                    11:00</p> <p>Your voice matters. As part of our public...</p>			 2  3  0  15	 1.5K  1.6K  1.28	
<p>View post</p> <p>11 Nov</p>  <p>coventrycc  2022                                     13:00</p> <p>We want to hear your thoughts, ideas and...</p>			 0  0  2  15	 919  1.85	
<p>View post</p> <p>07 Nov</p>  <p>coventrycc  2022                                     11:00</p>			 1  0  0	 617  2.11	

## **Appendix 5 – Regulation 18 responses report**

## Houses in Multiple Occupation DPD - Regulation 18 Consultation Statement

Report of representations received

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/56	Madelein Struthers				<p>The clustering/dots used here is totally inappropriate and gives no indication of the true situation on Cannon Park estate.</p> <p>In the 134 property Greens there would be 107 dots very close together. Better use of magnification is seen on page 43, Figure 23 of the CCC Supporting document.</p>	15	Evidence base Object
HMO/101	Mrs Debbie Williams				<p>This is a good indication of how densely populated the area around Cannon Park shops and along charter avenue is with existing HiMOs. Already far too many. Plus new student accomodation blocks are being built near the Tesco shopping centre, within Canley and on Westwood Business Park so there should be less demand for student HiMOs rather than more. Hopefully some of the exisiting HiMOs could be turned back into family homes.</p>	4	Evidence base Support
HMO/115	Mr David Swanson				<p>The identification of current HMOs as red dots on the map inadequately captures and reflects the concentration of HMOs across the local community, in part due to the inappropriate scale used to represent the entire city on one map. If maps ere presented covering each ward, it would be easier to fully</p>	14	Evidence base Object



Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					understand the number of HMOs in each community. From inspection of the map as presented, I believe that the number of HMOs in the Cannon Park Estate/Cannon Hill Road community is significantly understated, possible due to missing data such as unlicensed HMOs.		
HMO/160	Philip Cowen				The extent of HMO conversion of roads such as Charter Avenue is extreme. Driving along the road I have seen houses almost completely demolished to be re-built from the ground up. Surely this should not be allowed and the fabric of existing buildings should be retained if conversions to HMOs go ahead.	13	Amenity Own experience
HMO/180	Mr David Cass				The scale of the plan is far too small and needs to be enlarged so that each HMO (which is represented by a red dot) can be specifically identified.	10	Evidence base Object
HMO/190	Mrs Jillian Cass				Comment – The scale of the plan is far too small and needs to be enlarged so that each HMO (which is represented by a red dot) can be specifically identified.	10	Evidence base Object
HMO/14	Leah Tardivel				What will happen with existing HMO's where they're already	2	Object Policy HMO1 Homes in

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					causing issues?		Multiple Occupation
HMO/27	None (Ms Janet Dixon)			None	The preferred approach looks a good way forward .	2	Policy HMO1 Homes in Multiple Occupation Support
HMO/37	Mr Keith Struthers				<p>At 40%, has a harmful concentration of HMOs already occurred in the Cannon Park estate?</p> <p>CCC needs to address that, and come up with actions that protect remaining home owning Council Tax paying residents. In addition for consideration of introduction of Article 4 Direction, current restrictions in Cannon Park of enforceable double and single yellow lines must be maintained in perpetuity to protect what remains of the social fabric of the Estate.</p>	5	A4D Miscellaneous Policy HMO2 Concentrations and Thresholds Support
HMO/47	Madelein Struthers				<p>In Cannon Park Estate, harmful concentrations have already arisen with elderly individual isolated and lonely. This should never have been allowed to occur.</p> <p>Article 4 Direction must be introduced to gain further control of the process, which is already weak.</p>	6	A4D Miscellaneous

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/66	Mr Jon Hodge				Waste Management and Parking are key considerations. We are in a restricted residents parking zone, which means parking has to be on driveways meaning there is typically a maximum of 2 cars that can be managed sensibly for each property	1	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support
HMO/67	Mr Jon Hodge				Waste Management and Parking are key considerations. We are in a restricted residents parking zone, which means parking has to be on driveways meaning there is typically a maximum of 2 cars that can be managed sensibly for each property	2	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support
HMO/106	Mr David Swanson				The policy proposals set out in Draft Policy HM01 are supported. Point (c) is particularly important as it has been failure to consider this these aspects consistently in the local community that has resulted in the current over intensification of HMOs in the Cannon Park Estate and is starting to be evident in the Cannon Hill Road localities.	5	Policy HMO1 Homes in Multiple Occupation Support
HMO/138	Bevcor Group Ltd (Mr Robert Corrigan)			Bevcor Group Ltd	We have lived in the southern tip of the Canley Conservation Area for the past 15 years. We are immediately adjacent to the housing most greatly affected over that time regarding the	1	Policy HMO1 Homes in Multiple Occupation Support

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					<p>conversion to HMOs in the Canley / Cannon Park area. We are completely in support of the Article 4 Direction policy and its attempt to better regulate HMOs, in the name of improving the quality of life for existing and future homeowners in our neighbourhood.</p> <p>The advent of the HMOs in our area we understand to be down to the rapid expansion of the student population at the University of Warwick. We are not members of the university community, but overall we are extremely supportive of the university. We also understand the importance of the University of Warwick, not to mention Coventry University, for the economic well-being of Coventry.</p> <p>However, we have been greatly dismayed over the years to watch the quality and upkeep of the housing in the neighbourhood decline substantially, almost all due to the HMOs. A 10 minute walk around our neighbourhood provides proof certain that the absentee landlords of many HMOs have little interest in the physical appearance of their properties, and willfully neglect their upkeep. For example, where there were flourishing flowerbeds in years past, there are weeds and often overgrown grass uncut for months or even a year. Much of the fencing is in horrific condition. Once refurbishment is done, construction materials often lie about the site haphazardly for weeks, months and years. We also have strong reason to believe, from conversations with builders, that the representations made by HMO owners /</p>		

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					<p>landlords to the Council often have false information in them to disguise the nature of their HMOs eg, an 'office' is really an accommodation, and a house is repurposed for eight students not five or six.</p> <p>We are hopeful that Article 4 will lead to much needed additional scrutiny and regulation of HMOs in our area and throughout the city.</p>		
HMO/151	Philip Cowen				<p>The council should set the bar high for proposals to meet the points above. We have already seen in Chapelfields around Craven Street that traffic surveys can be carried out at the most suitable times to demonstrate there is parking capacity in an area. Developers and their representatives will have no qualms about using similar tactics to demonstrate the points above. The council should have clear metrics established to determine the bar to be reached for each point.</p>	4	Key Issues Other Policy HMO1 Homes in Multiple Occupation Support Support
HMO/165	CARTA (Miss Sian Thuraisingam)			CARTA	<p>The CARTA area incorporates the Chapelfields Conservation Area. Properties are narrow terraced houses with very limited off-street parking. The existing conversions have had no regard for reasonable, safe, accessible and convenient vehicular parking. The increase in people living in a property has increased the volume of vehicles vying for parking spaces. Our area has a</p>	3	Policy HMO2 Concentrations and Thresholds Support

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					<p>thriving pub trade so in addition to issues with residents being able to park the increase in vehicles is having a detrimental impact to people being able to visit the local pubs. As a Residents' and Traders' Association we are keen to ensure that local businesses are also not impacted negatively.</p> <p>Developers are often not local and have no regard for the Conservation status and character of the area. We have had instances of changes made to properties without appropriate planning including illegal installation of external cladding to a property, this was despite a number of residents pointing out to the builders that there are additional requirements because of our conservation area status.</p>		
HMO/1	Mr Charles Barker				<p>I fully support the proposed introduction of Article 4 directions. This is overdue. The rapid growth of HMOs in my area (Lower Stoke) has already had a seriously negative effect. It has all been said before but I say it again: A large number of HMOs mean houses falling into neglect. The residents have no stake in the community, nor do the (often absentee) landlords. The fabric of what was a settled, cared-for community slowly falls apart - litter in the streets, overflowing bins, fly-tipping, shabby housing. This is happening now! Families drift away to better cared-for suburbs, their homes in turn become HMOs, and the spiral of decline continues. Instead of allowing rentiers to make money by packing people into low-quality accommodation, let's keep our houses fit</p>	1	<p>Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support Support</p>

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					<p>for families to bring up their children in safety. Let's create and maintain genuine communities for the long term - places where people know and care for each other, and their surroundings.</p> <p>Yes to Article 4 directions!</p>		
HMO/2	Rebecca Thompson				<p>Would love to see article 4 introduced. However, concerned about the length of time to become effective meaning developers could buy up stick and convert quickly. Plus what will happen to houses already converted or in the process of being that haven't had planning approval for things they need, such as velux on the front elevation? To grant retrospectively just says they can do what they want and with many having been bought by quick buy developers during covid, street scenes have changed rapidly. The developers price first time buyers out as they have cash and buy quickly.</p>	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/8	National Highways (Miss Karishma Khatri)			National Highways	<p>Thank you for the opportunity to respond to the Homes in Multiple Occupation (HMO) Development Plan Document consultation. We have reviewed the associated documentation and do not consider this to be of interest to the Strategic Road Network. As such, National Highways have no further comment.</p>	1	Miscellaneous No comment

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HMO/9	Mr John Hudson				Whether this does preserve the character of neighbourhoods remains to be seen, as lack of an Article 4 directive over the best part of a decade has seen areas of our city deteriorate to a point which seems beyond reclamation. Still, it's better late than never,, even if it does seem too little too late. I look forward to a detailed plan of how these 11 wards can be regenerated into something like what they once were.	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/10	Ms Janet Vaughan				I support the introduction of Article 4, because in the 25 years I have lived in Sherbourne Ward, I've seen the houses in my street gradually become HMOs to house 6 or more tenants/separate households in what were previously family homes. When we first moved in, the street was a mix of families, older couples who had been there a while and a couple of the houses were converted into two flats. There was a stability about the area as there was a pretty low turnover of residents, and there was a feeling of community and safety in those familiar faces. The street was tidy because less people generate less rubbish and there tends to be more care for the area; and the neighbours we would recognise by sight even if we were not exactly friends. It's very different now - with at least 75% of the street HMOs, or short term rentals, almost all the front (and back) gardens are yards - so there is less greenery and less wildlife. The rain water run off is far faster and greater volume because it is running off paving rather than soaking into grass/earth/ground, and of course there is more demand for parking etc.	1	Amenity General Observation Own experience Policy HMO1 Homes in Multiple Occupation Statistical evidence Support



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					<p>The number of additional toilets (most HMOs in the street seem to have en suite bathrooms for each room) adds a huge amount of additional waste into the Victorian sewers that they were not designed for, and as the inspection cover for several houses is sited in my garden, I can attest to the impact this has in terms of smell. However, perhaps the main impacts of high concentrations of HMOs are 1. High turnover of tenants means we don't know who our neighbours are, feel less safe and community becomes pretty non-existent; 2. High turnover of tenants also means that every year landlords re-fit rooms that people have vacated which generates an enormous amount of waste on top of the waste tenants leave; 3. Multiple wheelie bins are needed for each HMO, which means the pavement is very difficult to navigate, bins are continually overflowing because landlords/ short term tenants do not have a good system for separating waste streams and all bins get filled with plastic bags and so are never emptied, leading to rubbish piled up and - of course - rats. I feel that the introduction of Article 4 would be a step towards mapping HMO provision across the city and enabling communities to resist additional HMOs - although I worry that there is so little community left in areas that already have areas of high HMO concentration, that this may not be a strong enough measure.</p>		
HMO/11	Stephen Child				<p>I live in canon park and moved here in July 2021. Already in only 12 months have seen HMO's created without any planning</p>	1	<p>Amenity General Observation</p>

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					permission and these are all for housing students. The estate is starting to look dirty and there are clusters of HMO's. This legislation is vital if we are to maintain some sense of community in our city and some balance. No one in the council can tell me what good looks like for an area for ratios of HMO's per x houses or people so no surprise it's growing uncontrollably.		
HMO/12	Miss Lucy Thorpe				I live in Cannon Park and have done for the past year (Old Mill Avenue CV4). This is an area with an extremely large number of HMOs and rising. There are 'official' HMOs with planning and then numerous other dwellings that have either been denied HMO status but are clearly operating as such, or landlord owned homes which have a high volume of student tenants. There are now whole roads which are purely made up of student housing. The area is gradually being bought up by business people who are looking to provide student accommodation for overseas students at Warwick University. The end result is that we are now in a position where the estate is becoming unkempt and pretty much an off-shoot of the uni - despite our property being valued in the region of 700K we are now living alongside residencies which are becoming in gradual disrepair with overgrown gardens and huge volumes of rubbish and numerous shopping trolleys (there were 9 alone left in the roads last Friday night on a short walk that I did with my dog on the estate). The council needs to take action to address the unsanctioned HMOs and stop these landlords from	1	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support

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					<p>buying what could become family properties. This would enable us to drive a sense of local community and also help to maintain the general upkeep of the estate. There are another two properties currently which I know of that are in the process of being converted and something needs to be done about this as a matter of urgency. I know that one was refused HMO status but is obviously being converted as such (indeed I saw students moving in there today). If I built an extension without proper planning I would be asked to take this down but it would seem that these landlords can do what ever they like and the council turns a blind eye.</p>		
HMO/18	Mrs Lynn Hnat				<p>Afternoon,</p> <p>I have petitioned the Proposed Blanket Banned HMO area for Moreall Meadows estates. I would like to proposed 10% limit for the the Moreall Meadows estate which covers Moreall Meadows, The Arboretum, Russet Grove, Cassandra Close, Poppyfield Court and Heritage Court streets. There was over 120 signatures for the banned HMO proposal that wasn't accepted. This would be the fairest way to make sure there is a very limited HMOs in this neighbourhood.</p> <p>The development area that already in used only for single household unit has already been agreed by Coventry Council regarding a restrictive covenant that has been placed on the</p>	1	Policy HMO2 Concentrations and Thresholds Support

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					<p>development area by the land deed agreement which was dated 27 March 1897 between David Wilson, developer and the private owners and Coventry Council. The tile number is WM44722. The 10% limited HMO proposal would cover Moreall Meadows, The Arboretum, Russet Grove, Cassandra Close, Poppyfield Court and Heritage Court.</p> <p>If you have any further enquiries, please do not hesitate to get in touch with me. Many thanks.</p> <p>Lynn Hnat</p> <p><a href="mailto:lynnhnat66@sky.com">lynnhnat66@sky.com</a> or <a href="mailto:lynnhnat00@gmail.com">lynnhnat00@gmail.com</a></p>		
HMO/19	Mrs Teresa Whetstone				There should be greater control over the number of HMOs in residential areas.	1	Policy HMO1 Homes in Multiple Occupation Policy HMO2 Concentrations and Thresholds Support Support

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HMO/33	Mr Keith Struthers				<p>Since 2008, when the University of Warwick expressed its intention to house students in neighbouring suburbs, the CP/CHR area has been increasingly targeted by developers for conversion to student HMOs. Concern was raised by CPCA from the outset about this, and asked in 2011, for Article 4 Direction to be introduced. These please were ignored, and residents objected to many applications for HMOs of 7 or more residents, supported by Cllr Sawdon at Planning meetings. These objections were usually ignored. By 2017, it was estimated that 27% of properties in CP were HMOs; a 159 signature petition was gathered by CPCA following a AGM. This was presented by Cllr Sawdon to CCC Cabinet, but this and a second petition were shelved for 1 year and no appropriate review took place. The HMO rate in CP is now estimated at 40%.</p> <p>In the Greens of CP, with 134 properties, essentially all HMOs of 6 or less occupants, it is estimated at the HMO rate is 80%. If Article 4 Direction had been introduced in 2011, this could have prevented the ongoing social disruption of CP in particular, and if a sensible limit had been put on these areas.</p> <p>The HMO-isation of CP/CHR area has led to an overwhelming demographic change of a previously cosmopolitan, family orientated community. Isolation and loneliness of single elderly CT paying residents is completely unacceptable; it is remaining residents who try to obviate and address these issues.</p>	1	Evidence base General Observation Object Statistical evidence

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					<p>These issues are apparently of no concern to CCC, the University or owners of HMOs.</p> <p>It is astonishing that the IcenI (the key evidence based document cited by CCC) makes no reference at all to CP/CHR area.</p>		
HMO/42	Madelein Struthers				<p>Cannon Park Estate (CPE) has been under pressure to provide HMOs for University of Warwick students since 2009. In 2013 17% of properties in CPE were HMOs, by 2017 this was 27% and 2022 the rate is estimated 40%. CCC planning committee granted many applications for HMOs of 7 or more bedrooms. In CPE local residents were very concerned about, this uncontrolled development, and also the fact that HMOs which have 6 or less bedrooms were granted.</p>	1	General Observation Statistical evidence
HMO/43	Madelein Struthers				<p>Cannon Park Estate (CPE), a residential area of 368 properties in a family orientated, cosmopolitan suburb has been under increasing pressure to provide student HMOs for University of Warwick (UoW). By 2013, 17% of properties were HMOs, this had risen to 27% by 2017 and 40% by 2022, dramatically altering the social fabric of CPE, so much so that very few local children are present to attend Cannon Park Primary School on the Estate. The local Council Tax (CT) paying home owners are increasingly older, often single retired individuals.</p>	2	General Observation Policy HMO1 Homes in Multiple Occupation Statistical evidence Support

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					<p>Through the community association (CPCA), residents felt unsupported by the Council to prevent this. Applications for HMOs of 7 or more bedrooms were readily granted by CCC Planning Committee, with total disregard of local residents. HMOS of 6 or less beds, which do not require planning permission were especially developed in the 134 property Greens, where 80% are now HMOs, an unacceptable level.</p> <p>Article 4 Direction must be introduced for CPE in order that all HMO applications require planning permission. This must be done with Planning Committee robustly enforcing, for a change, CCC planning policies and national guidance, to put a stop to the unacceptable level of HMO-isation.</p> <p>Properties for students must be built on campus where there is plenty of space</p>		
HMO/57	Mrs Diane Tolley				<p>I believe having an Article 4 in place to be excellent in fact this should have been done years ago. I have nothing against students and know that they do a lot of good in communities. I have a problem with landlords they do not look after the properties or give the students enough information about what is expected from them. I have worked in the community for over 20 years and have seen how the state of the community has deteriorated. We have a real problem with rubbish being dumped everywhere, landlords not providing enough rubbish bins and not telling students what</p>	1	<p>Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support</p>

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					<p>goes in each bin. Students leaving windows open at night which encourages burglars and putting the rest of the community at risk. By allowing landlords to keep buying up houses prevents younger people from getting on the property ladder as this this puts the price of properties out of their price range. I also believe that part of the planning application should be an agreement to install solar panels on any new properties or HMO's irrespective of whether it is a private property or housing association.</p>		
HMO/58	Mr Terry Smith				<p>Having lived in a residential street for 30 years I have seen how things have changed over the years.</p> <p>About 20 years ago there wasn't any HMO's in my street, it was clean, it was quiet &amp; it was a nice place to bring up a child.</p> <p>Gradually over time greedy landlords began to convert the lovely 100 year old houses into HMO's, overtime you start to see how much impact they can have on your area.</p> <p>The noise is completely rediculas, noone has any pride in the property they live in &amp; leave it in a mess because non of the occupants see it as their job so clean or sort out.</p> <p>The landlords place several people in one house without any criminal background check, how on earth is that safe, especially as a tenant. You will have no say on who you share you home</p>	1	<p>Amenity Own experience Policy HMO4 Amenity and Design Support</p>



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					<p>with.</p> <p>A man across the road from me had lived there for roughly 15 years, then the landlord decided to add more people into the property, the man had schizophrenia &amp; was clearly mentally unstable. About 6 months later he had stabbed the other guy in the back, the back of the neck &amp; left him to bleed to death, luckily he survived but was on a life support machine for weeks, he has not been the same since. Bottom line is they are not safe. I don't understand how single young women can feel safe living with complete strangers.</p> <p>Bins are another issue, how on earth is a house with more than 3 or 4 people supposed to share 1 wheelie bin? You can see how much rubbish is all over the street that they can't fit the HMO's shared bins.</p> <p>On top of HMO's there is Student accommodation in the street, there is hundreds &amp; hundreds of people living in one small road, it's unbareable to live here.</p> <p>My son has autism &amp; really struggles with the noise here.</p> <p>There really is no thought about familys anymore. We don't feel safe because of it.</p> <p>It is all a case of greed, turning family homes into separate rooms</p>		

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					<p>in order to charge more rent per calander month.</p> <p>Where are families supposed to live these days?</p>		
HMO/60	Mr Paul Smith				<p>I am fully supportive of the introduction of Article 4 in the area of Wainbody, Coventry. Having lived in the Cannon Park area since 1970 I have first-hand knowledge / experience of living in a neighborhood that has become over-run with HiMO's to the detriment of local young and professional families. The balance of ownership has swung too far away from such family ownership and this has led to a decline in the value and ambience of an otherwise family orientated suburb of Coventry. A 5% max limit of HiMO's is more than adequate for such an area of Coventry.</p>	1	Other Policy HMO1 Homes in Multiple Occupation Policy HMO2 Concentrations and Thresholds Support
HMO/65	Mr Dennis Cullinane				<p>I live on the Moreall Meadows estate which is adjacent to Warwick University. I have seen the negative impact on areas like Canley where there are numerous HMOs used mainly by students. Too many HMOs concentrated in an area greatly affects family and community life. I am totally against the same situation developing on the Moreall Meadows estate. As an individual resident I would suggest that the number of HMOs allowed on this estate is limited to a maximum of 5% of the total properties. There are 104 properties on the estate which would allow 5 HMOs in this area.</p>	1	Policy HMO2 Concentrations and Thresholds Support

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HMO/75	The Coventry Society (Mr John Payne)			The Coventry Society	I support this policy.	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/83	Mrs Wendy Scrivener				I support the City Councils proposals. It is vital to retain and if possible increase the availability of family homes in the city.	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/84	University of Warwick (Mrs Vikki Lomas)			University of Warwick	<p>Having lived at my property for around 30 years now I am surrounded by rental properties that nobody takes any care or pride in and the area is starting to look like a slum.</p> <p>I have had to make complaints to EHO for rat infestations due to rubbish outside the house next door, none of the surrounding gardens are taken care of and noise issues are becoming more frequent.</p> <p>We have had notice of the 3 bedroom terraced house next door now wanting to be a 7 bedroom, this is just not acceptable on many levels - parking, rubbish facilities, noise of amount of</p>	1	Amenity Amenity General Observation Own experience Policy HMO4 Amenity and Design Support

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					<p>people in the house, extension overlooking my private garden and no doubt the garden still not being maintained.</p> <p>What was once a lovely friendly community Is now just a cash cow for greedy landlords and an extension of student accommodation.</p>		
HMO/85	Phyllis Hyde				<p>I strongly support what the Council is trying to do. I have lived next door to a rental property, which has been occupied by a variety of different tenants, over a long period of time. I have seen what changes occur when a primarily owner occupier/ residential area changes character too rapidly both where I live and where friends and family live. There needs to be some sort of control here, as there is in other comparable cities. As a volunteer advisor at Coventry Citizens Advice, I see the impact of less than ideal landlords on the lives of some Coventry tenants.</p>	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/86	Mrs Michele Gawthorpe				<p>Allowing multiple HMOs in our neighbourhood is detracting from its nature and desirability. Students do not care for the properties and large quantities of rubbish, overflowing skips and supermarket trollies are a sadly common sight around much of our area. Please help our area return to a lively and friendly area with neighbours who talk to each other and walk their children to</p>	1	Amenity Amenity General Observation Own experience Policy HMO4 Amenity and Design

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					the local primary school.		Support
HMO/87	mr jagtar rai				<p>There is a strong and compelling need for HMO's. Restricting them by implementing planning controls is totally unnecessary and is likely to have adverse impacts on the room let sector by pushing up prices for tenants as they compete for fewer available rooms. HMO's serve a need in the community but sadly they are marginalised by communities as having the 'wrong' type of tenants. Residents often complain of late night ubers, pizza deliveries, parking issues with parties day and night, however, this is far from the truth. The residents of such houses do not usually have cars and parties are rare based on the nature of the multiple occupation. We need to stop this stigma and NIMBYISM in our communities where we appear to want longer term tenants in our communities and discriminate against those that are there for short-medium term work or study. We should leave the forces of supply and demand to work and not interfere. Surely if there is local work contracts, university places etc in residents local area, surely HMO's come part and parcel of this environment? All that will happen if you restrict HMO's is this type of occupation will go underground and unregulated with the authority being able to do nothing. We need to stop marginalising and discriminating against such tenants and occupation as it seems longer term residents are only concerned for their house prices and their perception of the 'wrong' types of shorter term</p>	1	Object Object Policy HMO1 Homes in Multiple Occupation Policy HMO2 Concentrations and Thresholds

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					residents occupying what they perceive to be 'their' streets.		
HMO/88	Coventry Tree Wardens (Mrs Dorothy Brady)			Coventry Tree Wardens	<p>There have been many complaints that Coventry population projections are too high in the recent past. See link - <a href="https://www.planningresource.co.uk/article/1715462/watchdog-finds-ons-population-projections-coventry-small-cities-potentially-high">https://www.planningresource.co.uk/article/1715462/watchdog-finds-ons-population-projections-coventry-small-cities-potentially-high</a></p> <p>I would like to see more detail about how the projected population increase is calculated</p> <p>If you include the population of students from the 2 universities, we need to remember that the vast majority of students are not permanent residents and that a high proportion of students are served by the many student accommodation buildings that have been build in recent times.</p> <p>I also want to know about the negative effects of the destruction of green land; destruction of green land, which adds to climate change and destroys wildlife environments.. All development must be weighed against Coventry people's need for green spaces and the mental and physical health benefits derived from them.</p>	1	Evidence base Miscellaneous Other

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HMO/95	Mrs. Barbara Moore				<p>Many permanent residents have been trying for years now to raise awareness to the detrimental effect of uncontrolled conversion of family homes into HMOs. Personally, since I first noticed the detrimental changes in our immediate neighbourhood in 2011, I have badgered Lower Stoke councillors, who have been very supportive, written many letters to the local press, and sat through many ward meetings, meetings of local residents' groups, and meetings with Planners and Council Officers, when we have urged the Council to introduce an Article 4 Direction to control the rapid proliferation of HMOs in our area and others.</p> <p>My husband George and I were founder members of a city-wide organisation, Coventry Action for Neighbourhoods (CAN), and together with other concerned residents' groups, have campaigned tirelessly for the Council to take control of the situation, pointing out that virtually every other University town in England had already used Article 4 to do so. The inevitable process of 'slumification' has gone largely unchecked as streets and whole areas begin to look shabby and run-down, and properties and their environs are neglected by transient tenants and 'rogue' landlords who don't care about their tenants or the area.</p> <p>We are glad to know that the Council is at last taking action, but are sorry to say that some areas of the city have already suffered considerable damage, probably irreparable, over recent years.</p>	1	Amenity Amenity General Observation Own experience

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HMO/96	MR MIKE THOMAS				I live in Cannon Hill Rd and very concerned about the number of houses of multi occupation both here and in adjacent Cannon Park Estate. They are mainly occupied by students of Warwick University. Many such houses are visibly poorly maintained, the grass is never cut, the students cause a parking issue, late night parties are an issue, and there are already sufficient HYMO's in the whole of the area. The value of our properties are clearly being affected by these issues significantly. I beg the council to do all in their power to stop more properties being used as such. So I support the move to implement Article 4.	1	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support Support
HMO/97	Mrs Vina Mistry				I live on Moreall Meadows and next to a house that has been on rent for the last 12+ years. We have seen this house not maintained by the landlord, multiple tenants, fighting on the lawn, tenants not able to access the circuit board or know the basics and end up knocking on our door as the landlord doesn't always help. We've had tenants sub let on Airbnb and when people come they were not able to get in as the keys were not left for them and my husband has ended up arranging a room in a hotel in Kenilworth. We have had numerous problems with multi tenants and the landlord taking the money and not caring about the neighbourhood or the property.  We deeply care about the area we live in and the people who live	1	Air B&Bs Amenity Miscellaneous Own experience Policy HMO2 Concentrations and Thresholds Support



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					here. We want tenants to take responsibility of their property like the residents do and not add tenants that they do not look after and houses they do not manage. Please restrict the number of HMOs as this is having a great impact on full time residents.		
HMO/98	Mrs Debbie Williams				<p>There is a strong need for this in the Cannon Park area. Many family homes are now converted to HiMO's, often massively over developed. Some landlords take care of the properties, others do not, making the area appear untidy and run down.</p> <p>There is limited stock for families now and the prices are being driven up due to developers buying houses as soon as they are on the market as they have no chain or other commitments.</p>	1	Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support Support
HMO/102	Mr David Swanson				<p>The bringing forward of an Article 4 Direction consultation by Coventry City Council is broadly welcomed. Living in the Cannon Park area of the Wainbody ward, we have seen an enormous increase in the number of HMOs in the past 10 years following the University of Warwick's declared intention to seek an increase in the number of students to be housed in the local community close to the university campus. I am not objecting to the fact that so many students live in the community as they are generally quiet and do not make any trouble; but what is unacceptable is the enormous loss of family homes and the</p>	1	Amenity General Observation Own experience Policy HMO1 Homes in Multiple Occupation Support

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<p>associated neighbourhood community.</p> <p>The largest single estate in the area, Cannon Park Estate, was previously home to over 300 professional families and couples. Now over 40% of these properties have been acquired by developer landlords and converted into HMOs generally housing between 4 and 8 students each. The local school was once thriving with children from the estate; now it has a relatively small intake from the estate and is dependent on attracting pupils from further afield who need to be driven to and from the school every day. In one 'sub-estate' comprising 134 properties, now over 80% have been converted to HMOs included many small semi-detached bungalows originally build to house retired couples. The conversion of all but one of these has effectively removed this valuable source of easy-manageable housing from the market and led to elderly residents being unable to down-size their property locally.</p> <p>In my personal opinion, the proposed introduction of Article 4 Direction is far too late to avoid the decimation of our local community, and should have been introduced as policy at the time the university stated its intent to promote housing students off-campus. Our local community association raised concerns about the proliferation of HMOs in 2011 but these concerns were ignored; applications to convert properties to HMOs were objected to with support from our local councillors but these objections were set aside; and despite constant lobbying for an</p>		

<b>Comment ID</b>	<b>Respondent Name</b>	<b>Agent Name</b>	<b>Agent Organisation</b>	<b>Respondent Organisation</b>	<b>Comment</b>	<b>Comment number by this respondent</b>	<b>Tags against this comment</b>
					Article 4 Direction, the association was unable to stem the flow of HMO conversions. That said, so long as the policy is consistently implemented going forward, it will protect other local communities in ways that Cannon Park has not been able to enjoy.		
HMO/122	Mrs Joscelyne Bigham				As well as a focus on the wider impact on residents living within an area affected by HMOs, would it be possible to refer to the impact on health and wellbeing of the residents living in HMOs and the importance of having high quality housing standards for all.	5	Recommendations Suggested change to supporting text
HMO/123	Mrs Joscelyne Bigham				For the DPD to work successfully, it is important to have an accurate picture of the current level of HMOs within Coventry's wards at the street level. However, there is a concern that HMOs may be under recorded. Is there a register of existing HMOs which is regularly updated? Is there a mechanism in place to identify HMOs which are not registered? If not, is it possible to use the recent Census 2021 data to help identify them? Are there other ways of identifying HMOs that could be used? If they are not registered, should members of the public be able to report HMOs to the Council?	6	Evidence base Object Reporting mechanisms

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/137	Andrew Staker				We would welcome the implementation of an Article 4 in the Cannon Park and Cannon Hill area's. However, we regularly walk both of the estates and the large number of properties that are HIMO's is very obvious. Overflowing waste bins, Tesco trolley's left outside front doors or left on pavements and some of the houses badly kept has spoilt what were Coventry City Council Flagship Estates. But they are both Band E Council Tax area's. Most of these houses could not be returned to normal family houses as it would cost too much to convert them back.	1	Amenity General Observation Own experience Policy HMO1 Homes in Multiple Occupation Support
HMO/139	Mrs Irina Lloyd-Maggs				Licence for HMOs should be granted only on the condition of a landlord providing off road parking spaces for his tenants. Otherwise, if there is no off road parking spaces to satisfy HMO these houses should be rented only on the condition that the tenants have no driving licence and the tenants should sign a special declaration that they would not use any on road parking. Furthermore, the houses that have no off road parking spaces should be rented only to a one single family. In the case of no provision for off road parking the licence for HMO should be refused.	1	Miscellaneous licensing regime
HMO/140	Mr Philip Bywater				See comments in later sections	1	Miscellaneous

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HMO/145	CARTA (MR GRAHAM PAINE)			CARTA	As a longtime resident of Craven Street (I moved here in 1978) I feel that I am in an ideal position to comment, particularly as I have been chair of CARTA, the local residents and traders association (one of the very few in the country to include traders as well as residents), for some years. The area has suffered a slow, but inexorable, decline in recent years as we have seen an exodus of families (for which these former watch industry houses were constructed in the Victorian era). As families have moved out, these houses have been purchased by rapacious landlords with an eye to the quick buck who have converted these spacious properties to flats, leading to a massive increase in car ownership and reduction in care for properties. Worse, these conversions have often been carried out with no eye on maintaining appearance which has meant a much scruffier look now pervades the neighbourhood.	1	Own experience
HMO/146	Mr Tom Woodard				Reducing the number of new HMO will make more housing available for families and aids community cohesion.	1	General Observation
HMO/147	Dave Adkins				I am an absolute support of this new act.  As a home owner sandwiched between 2 HMO's and the various challenges this brings, I wish to state my unequivocal support to make the new HMO act happen in Coventry. It is long awaited!	1	General Observation Own experience Policy HMO3 Sandwiching Support

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					Dave Adkins		
HMO/161	Mr G S Jandu				I think a 5% limit will be a fair limit on estates which are primarily family estates. This will help in limiting Drugs, alcohol abuse, noise levels, litter, car parking, traffic and most importantly SECURITY. Security is a major problem as each adjoining householder usually keeps an eye on there neighbouring properties as as the link is broken by HMO there is a void and the existing householders become vulnerable so causing anxiety, depression and unable to leave there properties unsure if they will be safe on return. I strongly would like the limit to be NO MORE THAN 5%. THIS REPORT IS EVIDENCE BASED FROM THE EXISITING MULTI LET PROPERTIES IN THE AREA.	1	Own experience Policy HMO2 Concentrations and Thresholds Recommendations Suggested change to policy wording
HMO/171	Mr David Cass				This consultation relates to the change of use of properties from use class C3 (dwellinghouse), to use class C4 (small HMO) or Sui generis (large HMO). This consultation makes no reference to occupation that changes the use from C3 to occupation let via Airbnb, which could be short or long term and to a potentially changing number of related or unrelated people. Airbnbs are now very common and I am aware of at least 3 properties in my street that are let through Airbnb and cause the same problems as	1	Air B&Bs Miscellaneous

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					HMOs. Will Airbnbs be covered by Article 4?		
HMO/181	Mrs Jillian Cass				This consultation relates to the change of use of properties from use class C3 (dwellinghouse), to use class C4 (small HMO) or Sui generis (large HMO). This consultation makes no reference to occupation that changes the use from C3 to occupation let via Airbnb, which could be short or long term and to a potentially changing number of related or unrelated people. Airbnbs are now very common and I am aware of at least 3 properties in my street that are let through Airbnb and cause the same problems as HMOs. Will Airbnbs be covered by Article 4?	1	Air B&Bs Miscellaneous
HMO/34	Mr Keith Struthers				<p>The problem for the Cannon Park/Cannon Hill Road area (CP/CHR area) is that there was no control of the way property development took place here. There was a demand for housing of University of Warwick students, and home owning Council Tax paying residents were essentially ignored. Properties were bought by developers for commercial reasons, and there was no consideration of the consequences for local residents. One major consequence is that very few children from CP attend the CP Primary School. The cosmopolitan, family orientated suburb of CP was irrevocably changed.</p> <p>Now in CP with about 40% of properties as HMOs, many of 6 or</p>	2	General Observation Statistical evidence

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					<p>less persons, and the neighbourhood requires local residents to regularly help student HMO occupants with ongoing issues such as refuse disposal in order to keep the areas in reasonable condition. The University, Landlords, and local Councillors are generally not interested in these issues.</p> <p>In view of the current 40% HMO-isation of CP, Article 4 Direction must be introduced to control this process, combined with a more accountable Planning process. Discussion must take place with all parties as to the maximum allowable HMO-isation of the area.</p> <p>In addition, there is evidence that many HMOs are unlicensed. For HMOs occupied by students, there needs to be a (confidential) mechanism to cross check student addresses with CCC licensing data. It is only in this way that unlicensed HMOs are identified.</p> <p>The Iceni document astonishingly makes no reference to the CP/CHR side.</p>		
HMO/44	Madelein Struthers				<p>Cannon Park Estate (CPE) must have Article 4 Direction introduced so that all applications require permission. HMOs here are for UoW students, and this has placed an unacceptable burden on the social fabric of the Estate.</p>	3	Policy HMO2 Concentrations and Thresholds Support



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					<p>In addition to this, there needs to be more robust refusal of applications by Planning Committee, especially where the application will result in a change to the local neighbourhood character.</p> <p>Furthermore, all HMOs require licensing. On CPE a significant number are unlicensed. This has to improve, with more robust inspection.</p>		
HMO/76	The Coventry Society (Mr John Payne)			The Coventry Society	I support the council's efforts to bring HMOs under control. The damage caused to some neighbourhoods by unconstrained changes of use needs to be reduced for the benefit of resident families.	2	Policy HMO1 Homes in Multiple Occupation Support
HMO/103	Mr David Swanson				The need to better control the expansion of HMO housing stock is fully supported to prevent blighting local communities when HMOs become a significant part of a local community, as is the case in the Cannon Park Estate, and is increasingly the case in the housing estates off Cannon Hill Road. The issues identified in paragraph 2.3 are well recognised and are very evident in local community areas where HMOs have proliferated, particularly the issue of waste management and recycling. It is recommended that the need for effective management of waste be made a mandatory requirement for routine licencing of HMOs with	2	Policy HMO2 Concentrations and Thresholds Support

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					potential withdrawal of licences if waste regularly becomes a problem. Unfortunately, in the local area, too many HMOs remain unlicensed, and effectively outside of any direct council intervention. It is essential that, with the introduction of Article 4 Direction, there is a mandatory requirement to licence HMOs that achieve approval through the planning process.		
HMO/141	Mr Philip Bywater				See comments in later sections	2	Miscellaneous No comment
HMO/148	Philip Cowen				I agree and until January 2021 lived in Craven Street, Chapelfields for over 22 years. In that time the number of HMOs increased dramatically and the number of family homes reduced significantly. It became more difficult to park, there was more litter in the area and the wheelie bins were often left out all week. In addition more people came into the area to visit the pubs, which became more popular with little consideration for residents. Successive planning applications were approved and the developers were able to conduct their parking surveys to suit their purpose and prove whatever they wanted. This was all to the detriment of residents in the area.	1	Amenity Own experience
HMO/162	The Coal Authority (Mrs Melanie Lindsley)			The Coal Authority	It is noted that this current consultation relates to a Homes in Multiple Occupation DPD. I can confirm that the Planning team	1	Miscellaneous No comment

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					at the Coal authority have no specific comments to make on this document.		
HMO/35	Mr Keith Struthers				<p>The cosmopolitan, family orientated character and appearance of the Cannon Park Estate (and Cannon Hill Road area as well) has been irrevocably changed by uncontrolled HMO-isation.</p> <p>There was never any demonstrable consideration of this change in character by CCC, developers or the University, and the consequences for home owning resident Council Tax payers.</p>	3	Amenity General Observation
HMO/45	Madelein Struthers				<p>On Cannon Park Estate (CPE) the 40% HMO-isation rate is unacceptable. NPPF has not been used to maintain the character and appearance of CPE. The social fabric has disintegrated over 10 years with HMO-isation. Overall the standard of the Estate has decayed.</p> <p>This needs to stop, Article 4 Direction must be applied to the Estate, and a cap put on further HMOs as soon as possible.</p>	4	General Observation Statistical evidence
HMO/82	Mr Suresh Munyal				I would like to propose that we have no more than 5% of HMOs in any neighbourhood to prevent any disruption of family life.	1	Recommendations Suggested change to policy wording

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					I live next to Warwick University. I do feel that the universities should make proper provision for taking on more and more students.		
HMO/104	Mr David Swanson				<p>The introduction of policy withdrawing the Permitted Development Rights to convert properties from Residential to 'small HMO' is welcomed as a key step to controlling the currently uncontrolled HMO situation. However, it is important to ensure that any such policy introduced is rigorously and consistently applied in relation to the threshold criteria approved at the same time, i.e. limiting the density of HMOs in a specific area (as proposed at 10%), limiting the 'sandwiching' of private residences between HMOs, and restricting the creation of runs of adjoining HMOs in a street. It is also extremely important that planning enforcement is robustly applied and much more interventionist that at present where developers too frequently undertake the conversion and then apply for retrospective approval, this being seen as a way of achieving their aims without approval being achieved, especially when there is little prospect of enforcement demanding the reinstatement of properties which do not achieve the necessary approval.</p> <p>The prevailing character of localities and communities should also be a consideration when HMO proposals are presented for approval. A prime example being the complete change in demographics and community spirit in the Cannon Park Estate</p>	3	General Observation Policy HMO3 Sandwiching Statistical evidence Support

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					over the last 10 years as over 40% of properties have been progressively removed from the family homes context to become short stay tenancies for students. A change of such magnitude has effectively torn the heart out of what was previously a pleasant residential area.		
HMO/142	Mr Philip Bywater				<p>This section sets out the Council’s Local Plan policy (H11) on HiMOs, which was adopted in 2017. This policy does not permit the development of HiMOs that will materially harm the amenities of nearby properties, the appearance or character of the area, local services and the amenity value and living standards of occupants, their internal space and garden/amenity value. Yet this consultation document clearly acknowledges that only 5 years after this policy was adopted, 11 Wards in the City contain areas of harmful concentrations of HiMOs, creating exactly the problems that H11 was supposed to prevent.</p> <p>Despite strong action from some of the communities affected and pleas for Article 4 to be introduced years ago, the Council continued the ignore concerns and in doing so, ignored the NPPF requirement for the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes be provided to meet the needs of present and future generations.</p> <p>I live in CV4 and it is my belief (and that of many residents) that</p>	3	Amenity Own experience

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					<p>the two universities have attracted thousands of UK and overseas students to the city (which is great), with woefully inadequate provision of accommodation, once here. It has been left to the Market to sort the situation out, which has resulted in investors out bidding families for local housing, displacing families and elderly people to provide low quality, overcrowded, poorly managed student housing. Demand has massively outstripped the supply of homes in these areas. There have been around 700 new houses (with a few apartments) built in Canley, on scarce development land, in the last few years and although I don't have precise figures, my estimate would be that at least half (and probably more) of these have been bought by investor purchasers and rented to students. That does not fit well the NPPF requirement referred to above. It is noted that in the last 2-3 years large numbers of purpose built student housing developments have been completed in the city centre and one near Cannon Park.</p> <p>Communities have been badly damaged by this failure to control movement from use class C3 to C4 ('permitted development') which has left a legacy of many unsightly, overdeveloped and inappropriate properties and loss of community cohesion. Much of the damage cannot be put right but a strengthened Article 4 (see comments und Key Issues and Q3) can hopefully prevent the situation from getting any worse.</p>		
HMO/149	Philip Cowen				3.10 - one problem has been developers undertaking work without	2	Amenity Own experience

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					planning permission and then having the apply retrospectively with negotiation with the council. There are many unscrupulous developers who believe they can do as they please. For example the house on Queensland Avenue near the lights at Hearsall Lane. This was converted for 9 residents without planning permission and had to be highlighted to the council.		
HMO/163	CARTA (Miss Sian Thuraisingam)			CARTA	<p>Developers have had no regard for the provision of suitable parking – the houses which are being converted to HMOs have narrow frontages and no off-street parking – the additional volume of cars cannot be supported</p> <p>the character of the area is changing because there are more transient residents who do not necessarily have the same regard for the conservation area status as longer-term residents</p>	1	Amenity Amenity General Observation Own experience
HMO/172	Mr David Cass				This section sets out the Council’s Local Plan policy (H11) on HiMOs, which was adopted in 2017. This policy does not permit the development of HiMOs that will materially harm the amenities of nearby properties, the appearance or character of the area, local services and the amenity value and living standards of occupants, their internal space and garden/amenity value. Yet this consultation document clearly acknowledges that only 5 years after this policy was adopted, 11 Wards in the City contain areas	2	Existing Local Plan Policy Miscellaneous

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					<p>of harmful concentrations of HiMOs, creating exactly the problems that H11 was supposed to prevent.</p> <p>Despite strong action from some of the communities affected and pleas for Article 4 to be introduced years ago, the Council continued the ignore concerns and in doing so, ignored the NPPF requirement for the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes be provided to meet the needs of present and future generations.</p> <p>I live in CV4 and it is my belief (and that of many residents) that the two universities have attracted thousands of UK and overseas students to the city (which is great), with woefully inadequate provision of accommodation, once here. It has been left to the Market to sort the situation out, which has resulted in investors out bidding families for local housing, displacing families and elderly people to provide low quality, overcrowded, poorly managed student housing. Demand has massively outstripped the supply of homes in these areas. There have been around 700 new houses (with a few apartments) built in Canley, on scarce development land, in the last few years and although I don't have precise figures, my estimate would be that at least half (and probably more) of these have been bought by investor purchasers and rented to students. That does not fit well the NPPF requirement referred to above. It is noted that in the last 2-3 years large numbers of purpose built student housing developments</p>		



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					<p>have been completed in the city centre and one near Cannon Park.</p> <p>Communities have been badly damaged by this failure to control movement from use class C3 to C4 ('permitted development') which has left a legacy of many unsightly, overdeveloped and inappropriate properties and loss of community cohesion. Much of the damage cannot be put right but a strengthened Article 4 (see comments und Key Issues and Q3) can hopefully prevent the situation from getting any worse.</p>		
HMO/182	Mrs Jillian Cass				<p>This section sets out the Council's Local Plan policy (H11) on HiMOs, which was adopted in 2017. This policy does not permit the development of HiMOs that will materially harm the amenities of nearby properties, the appearance or character of the area, local services and the amenity value and living standards of occupants, their internal space and garden/amenity value. Yet this consultation document clearly acknowledges that only 5 years after this policy was adopted, 11 Wards in the City contain areas of harmful concentrations of HiMOs, creating exactly the problems that H11 was supposed to prevent.</p> <p>Despite strong action from some of the communities affected and pleas for Article 4 to be introduced years ago, the Council continued the ignore concerns and in doing so, ignored the NPPF requirement for the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and</p>	2	Existing Local Plan Policy Miscellaneous

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					<p>range of homes be provided to meet the needs of present and future generations.</p> <p>I live in CV4 and it is my belief (and that of many residents) that the two universities have attracted thousands of UK and overseas students to the city (which is great), with woefully inadequate provision of accommodation, once here. It has been left to the Market to sort the situation out, which has resulted in investors out bidding families for local housing, displacing families and elderly people to provide low quality, overcrowded, poorly managed student housing. Demand has massively outstripped the supply of homes in these areas. There have been around 700 new houses (with a few apartments) built in Canley, on scarce development land, in the last few years and although I don't have precise figures, my estimate would be that at least half (and probably more) of these have been bought by investor purchasers and rented to students. That does not fit well the NPPF requirement referred to above. It is noted that in the last 2-3 years large numbers of purpose built student housing developments have been completed in the city centre and one near Cannon Park.</p> <p>Communities have been badly damaged by this failure to control movement from use class C3 to C4 ('permitted development') which has left a legacy of many unsightly, overdeveloped and inappropriate properties and loss of community cohesion. Much of the damage cannot be put right but a strengthened Article 4 (see comments und Key Issues and Q3) can hopefully prevent the</p>		

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					situation from getting any worse.		
HMO/13	Leah Tardivel				<p>The major issues where I am are parking, as they often have several cars. This can spill into adjacent streets where things are really bad.</p> <p>There's also a huge step in price from smaller homes that can't easily be converted to an HMO to slightly larger single family dwellings that can, meaning families can't afford to move out of crowded housing because the price jump is too high.</p>	1	Amenity Own experience
HMO/21	Miss Cathy Pallister				the bullet points in 4.1 are spot on and these are my concerns and my neighbours who own their homes in this area.	2	Key Issues Support
HMO/26	None (Ms Janet Dixon)			None	I have been concerned for many years with the way my local area has changed because of the increase in HMOs which has caused problems with parking, refuse, a constantly changing population so that there is less social cohesion, loss of housing stock for families and anti social behaviour by some tenants. I strongly approve the plan to control the number of HMOs in an area as discussed above.	1	Amenity Key Issues Own experience Support

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HMO/36	Mr Keith Struthers				<p>For Cannon Park Estate and the Cannon Hill Road areas, the comment becomes repetitive. In CP the HMO rate is 40%, and thresholds and sandwiching were never considered in planning applications. The uncontrolled HMO-isation of the area has led to dramatic social changes in a cosmopolitan, family orientated community, which have essentially been ignored.</p> <p>The Iceni document, which is apparently a key part of the evidence base, does not mention the criteria of sandwiching and thresholds or Local Policies at all. They are fundamentally essential for inclusion, along with Article 4 Direction..</p>	4	Amenity Evidence base Object Own experience
HMO/46	Madelein Struthers				<p>All the issues listed above apply to Cannon Park Estate (CPE). In addition, the dramatic change in social character of CPE now means that elderly single individuals are isolated and lonely, in the middle of student HMOs.</p> <p>Sandwiching and thresholds were never considered.</p>	5	Key Issues Support
HMO/77	The Coventry Society (Mr John Payne)			The Coventry Society	I support this approach.	3	Key Issues Support

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HMO/78	The Coventry Society (Mr John Payne)			The Coventry Society	This is a fair representation of the problems experienced in some Coventry neighbourhoods	4	Key Issues Support
HMO/89	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>The CCWMP agrees with the identified potential issues that arise from such concentrations of HMOs, summarised as reduced social cohesion, reduced housing choice, reduced community engagement, noise and disturbance, overlooking and loss of privacy, degradation of visual amenity including through poor waste management, building maintenance, building alterations and frontage car parking, the reduction in local community services with shift to targeted retail/business including proliferation of hot food takeaways, and highway safety concerns.</p> <p>The CCWMP is aware that in some areas an over-concentration of HMO can create a transient population and whereby properties can be vacant for several weeks at a time. Development which increases the transient population or property vacancy within a neighbourhood can hinder the reduction in crime.</p>	1	Key Issues Support
HMO/94	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p><b>Detailed Comments on the Proposed Article 4 Direction</b></p> <p>The proposed Article 4 Direction (Homes in Multiple Occupation (HMO)) seeks to remove the permitted development right for the conversion of a residential dwellings to small HMO as provided</p>	6	A4D Miscellaneous

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					<p>for under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), Schedule 2, Part 3, Class L(b), that is: <i>'Development consisting of a change of use of a building - ... (b) from a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order, to a use falling within Class C4 (houses in multiple occupation) of that Schedule'</i></p> <p>The proposed Article 4 Direction would only apply in the Schedule 2 listed wards of: Cheylesmore, Earlsdon, Foleshill, Lower Stoke, Radford, Sherbourne, St Michaels, Upper Stoke, Wainbody, Westwood and Whoberley.</p> <p>The Article 4 Direction was made under Seal on 8 September 2022 and is expected to come into force no sooner than 1 July 2023.</p> <p>The CCWMP has noted that all the Draft Policies set out within the DPD would only apply to applications for large HMOs <u>unless</u> the proposed Article 4 Direction comes into force, <u>whereupon it will only apply</u> to applications for large HMOs across the city and for the conversion to small HMOs within the identified 11 wards; it thereby excludes 7 wards within the City's administration.</p> <p>However, it is noted that the DPD (paragraph 5.9) states that 'Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining areas, displacing the</p>		

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					<p>concentration’. Furthermore, this paragraph goes on to state that ‘Consequently, boundaries may change, new areas may be identified. Such areas would be subject to the preferred option policy’. However, unless these areas are included within the Article 4 Direction, the permitted development right for the conversion of a residential dwelling (Use Class C3) to a small HMO (Use Class C4) would remain, such that these conversions would not require planning permission or thereby, be subject to the proposed assessment set out within the Draft Policies of the DPD.</p> <p>Given the potential for displacement and the identified issues arising from the over-concentration of HMOs in any one area, the CCWMP strongly suggests that the Article 4 Direction be amended to be City-wide.</p>		
HMO/99	Mrs Debbie Williams				I agree with the list of issues given and feel they are occurring in my local area. The occupants of HiMOs tend to have less respect for their local area/ surroundings e.g. leaving litter, abandoning trolliwe from Tesco and so on.	2	Key Issues Support
HMO/105	Mr David Swanson				The issues and impacts of the significant accumulations of HMOs as set out in para 4.1 are well recognised in the Cannon Park Estate/Cannon Hill Road neighbourhoods.	4	Amenity Evidence base Own experience Support

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					<p>Loss of social cohesion in the area is prevalent throughout our community due to the change in demographics, the loss of family and neighbourly contact, the increasing number of isolated single elderly people living in properties surrounded by HMOs, and the basic fact that ageing long term residents have little in common with what has become primarily overseas student short term neighbours. The transient nature of HMO tenancies has a direct impact on the ability for local communities to be created and the establishment of the bonds that make such communities succeed.</p> <p>The unrestricted conversion of smaller properties, particularly bungalows in our local community has led to the loss of these homes from the housing market, effectively denying ageing residents the opportunity to 'down-size' and leaving them with the worries and mental health concerns of looking after properties that are too big for their needs. The existence of unrestricted Permitted Development Rights for such properties has been a prime factor in the loss of this important housing stock.</p> <p>The over-development of so many properties, particularly the larger Sui Generis HMOs, has resulted in significant intensification of both the massing of such properties and the number of persons living in them, with consequent increases in the number of people coming and going, the number of cars parked or visiting, the amount of waste being produced (i.e. the number of bins required), the impact of annual tenancy changes including remediation works, clearing of properties, volumes of</p>		



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					<p>waste created, and occasions of 'fly tipping'; all of which directly impact on the look and feel of local streets and neighbourhoods for local residents.</p> <p>It is considered essential that the implementation of any Article 4 Direction and its associated policies, directly and consistently address the issues identified.</p> <p>The three Key Issues set out in section 4, Concentration, Sandwiching and Threshold, if accompanied by the proposed removal of Permitted Development Rights, are all supported and will be beneficial so long as they are consistently applied during the formal planning process and if failure to comply with the planning process results in effective enforcement action being taken; both features that do not seem to be consistently evident in the current planning process.</p>		
HMO/116	Mrs Joscelyne Bigham				<p>Please consider adding the following to the list of issues:</p> <ul style="list-style-type: none"> <li>• Reduction in green space and increase in urban creep (increasing flood risk within an area) as gardens are used for parking, building extensions, etc. Areas which have higher levels of densification, infill, backland development and HMOs will need more public open space for health and wellbeing.</li> <li>• Increase in level of fly-tipping within the local area</li> </ul>	1	Amenity Amenity General Observation Key Issues Own experience Support

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<p>especially when a resident moves in/out of a property, e.g. old mattresses.</p> <ul style="list-style-type: none"> <li>• Increase in demand for local services, e.g. GP, dentist.</li> <li>• Insufficient storage areas for waste leading to health and safety issues, e.g. bin bags piled up in gardens attracting vermin.</li> <li>• Security issues leading to increased levels of crime, e.g. insecure access and poor lighting, lack of secure cycle parking, on street parking of work/delivery vans owned by residents, management of post and deliveries. Should 'Secured by Design' guidelines (<a href="https://www.securedbydesign.com/guidance/design-guides">https://www.securedbydesign.com/guidance/design-guides</a>) be referred to?</li> <li>• Lack of safeguarding measures for women, minors, vulnerable young adults, people with learning disabilities, etc. Are there any specific regulations/rules involving the safeguarding of children?</li> <li>• Insufficient cooking and secure food storage facilities leading to over reliance on takeaways, etc. This could lead to poor diet, cost of living issues, etc.</li> <li>• Insufficient provision for washing and drying clothes could lead to health problems as hanging damp washing in rooms could lead to poor living conditions i.e., damp and mould. It would also have an impact on the cost of living as overuse of tumble dryers would increase electricity bills and the use of laundry services would add additional expense.</li> </ul>		

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					<ul style="list-style-type: none"> <li>Poor standards in heating, insulation and ventilation of buildings could lead to cost of living issues and health problems, such as respiratory illnesses caused by condensation, damp and mould (<a href="https://www.euro.who.int/__data/assets/pdf_file/0003/78636/Damp_Mould_Brochure.pdf">https://www.euro.who.int/__data/assets/pdf_file/0003/78636/Damp_Mould_Brochure.pdf</a>).</li> <li>Shared use of washing facilities and toilets, if they are not kept clean, and restricted access to hot water could also cause health issues.</li> </ul>		
HMO/119	Cheryl Revill				We are in agreement with the outlined issues in this section. We feel it important to limit the number of HIMO's in order to preserve quieter family environments where properties are well maintained, roads and streets are less congested with vehicular parking and there is less overdevelopment of average sized houses into oversized properties which are far too overbearing on neighbouring non-HIMO properties.	1	Key Issues Support
HMO/124	Mr Paul Newman				I believe the issues stated do reflect what I have seen in our area. Residents of our local HMO's change on a very frequent basis, sometimes only a matter of weeks. This means that they are not involved in the community and have very little regard for their surroundings. We have seen an increase in rubbish discarded from vehicles straight into the street as well an increase in fly tipping when people move out of	1	Amenity Key Issues Own experience Support

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<p>properties.</p> <p>Developers have been able to outprice owner occupiers so that there is now an imbalance in long term residents versus short term HMO residents. Family housing stock has been converted to HMOs to get the most profit and this has led to families leaving the area and new families not moving to the area because they can no longer afford it and there are less homes available.</p> <p>Our area is a conservation area with very limited parking, the majority of which is on street. The houses are narrow terraced houses - in the past there may have been 2 cars per house, however with the conversions there are now sometimes 5 cars for a house. This is a real issue in our area which has meant long term residents are thinking of leaving as they are now unable to park anywhere near their homes. Our area also has a number of pubs which people do drive to - the pubs are a key part of the area and have been around far longer than the HMO conversions, the area simply cannot come with the increase in volume of vehicles because of HMOs.</p>		

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HMO/134	Mr Ian Stevenson				The 10% Threshold test should also apply where Purpose Built Student Accommodation blocks are proposed within 100m of existing residential areas.	1	Other Policy HMO2 Concentrations and Thresholds
HMO/143	Mr Philip Bywater				<p>Q1. Yes these represent my experiences, although I would add poor design and loss of amenity/greenspace.</p> <p>Key Issues – Under HMO Thresholds I would add the following comment:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should be a further layer of control so that the 10% figure should also not be exceeded within a 500 metre radius. This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	4	Amenity Key Issues Object Own experience Policy HMO2 Concentrations and Thresholds Support

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HMO/150	Philip Cowen				<p>It is important that a proper register of HMOs is compiled and kept up to date otherwise the threshold test cannot be accurately applied. Local knowledge can help identify which properties are occupied as HMOs and the council should follow up on all suspected properties to establish this.</p> <p>I agree with all of the issues identified and I would also include lack of parking among these as well. Also, as the character of an area changes the way it is perceived by developers and also Estate Agents changes. When we sold our house on Craven Street the Estate Agent said it was too large for a family and only suitable for developers. I'm convinced that they took this view to make their life easier and in the hope of a quick sale with little need for real selling effort. This perpetuates the change in the character and decline of an area.</p>	3	Amenity Evidence base Other Own experience
HMO/164	CARTA (Miss Sian Thuraisingam)			CARTA	<p><b>Section 4.1 – comments in red (have been put in italics when inputted into Inovem)</b></p> <ul style="list-style-type: none"> <li>Reduced social cohesion resulting from the short-term nature of residencies involved with HMOs which may involve younger people overall - demographic imbalance. <i>This is an issue in our area. HMO residents are temporary residents and often do not engage in local</i></li> </ul>	2	Amenity Amenity General Observation Key Issues Own experience Support

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					<p><i>community activities.</i></p> <ul style="list-style-type: none"> <li>• Reduced housing choice resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation); <i>Yes – there is now a lack of available family housing because developers have converted houses into HMOs</i></li> <li>• Reduced community engagement from residents resulting from an increase in the transient population of an area; <i>Yes</i></li> <li>• Noise and disturbance resulting from intensification of the residential use and/or the constantly changing nature of households; <i>This is not a particular concern in our area.</i></li> <li>• Overlooking and loss of privacy resulting from poorly considered internal layouts and intensification of use; <i>We have not noticed this</i></li> <li>• Detriment to visual amenity resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking; <i>We do feel that there is an increase in poor waste management and property maintenance, however we have very few properties where frontage areas are large enough for off-street parking so this is not an issue.</i></li> <li>• Reduced community services resulting from a shift in the retail/business offer towards a narrower demographic such as the proliferation of Hot Food Takeaways; and</li> </ul>		

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<ul style="list-style-type: none"> <li>Highway safety concerns resulting from congested on-street parking and poor waste management. <i>Yes, these are two of our biggest concerns. Our streets simply cannot take the extra volume of vehicles that the conversions have added to our roads. We do not have off road parking available and residents have been known to sometimes park two abreast out of frustration, this is obviously a serious risk to traffic travelling down our streets. Long term residents are considering leaving the area because they can no longer park anywhere in the area. We have seen an increase in overflowing bins where tenants do not necessarily know/care about which bins to use and hence waste overflows. We also have seen an increase in fly tipping of mattresses etc as tenants change.</i></li> </ul>		
HMO/170	Cannon Park Community Association (Mr David Swanson)			Cannon Park Community Association	<p>Looking at the specific issues of high density HMO properties affecting the Cannon Park/Cannon Hill Road area, the following points reflect those outlined in section 4 of the Development Plan Document:-</p> <ol style="list-style-type: none"> <li>Significant loss of social cohesion in the area resulting in many private residents, often single elderly lady residents being effectively isolated from their neighbours by several HMOs. This has led to a loss, if not total absence of community spirit and support to the detriment</li> </ol>	1	Amenity Own experience



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					<p>of these ageing residents. It is very evident that the HMO tenants who are generally overseas students have little or no interest in integrating with the local community residents, and likewise, the local residents have little in common with the students either. The short term nature of HMO tenancies further impacts on the ability of residents to form effective communities, further leading to isolation and loss of local social cohesion.</p> <ol style="list-style-type: none"> <li data-bbox="1003 683 1731 1102">2. The wholesale conversion of properties, particularly bungalows, in the Cannon Park Estate has led to the loss of these homes to the private housing market and the effective removal of down-sizing opportunities for elderly residents locally. Looking back 10 years, many of the bungalows which are located within easy walking distance of the local shopping centre were homes for retired couples; now all but one are HMOs. Similarly, in another street, 6 out of 18 bungalows are now HMOs of which 5 are adjacent properties, and to emphasise point 1 above, of the other 12, 7 are occupied by single elderly persons of which 6 are ladies.</li> <li data-bbox="1003 1102 1731 1386">3. Where properties have been bought by developer landlords for extension and conversion into HMOs, the extensions are frequently very large and out of keeping with the existing property, neighbouring properties and the general look and feel of the street. Despite these extension being presented for planning approval, the application of the National Planning Policy Framework,</li> </ol>		

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					<p>relevant local planning policies and the views of local residents to be arbitrarily applied with some applications being refused on policy grounds whilst others of similar size and impact are approved. The situation is further compounded by developments proceeding despite being refused or with works undertaken on the assumption that retrospective planning approval will be secured.</p> <p>4. Within Cannon Park Estate, the adverse impact of HMOs on visual and social amenity is significant, particularly from inadequate maintenance of properties including front gardens and property paintwork, the unattractive use of net curtains and closed curtains, and the very frequent poor waste management leading to incorrect bin use, failure to put bins out for collection and bins left out for days when they are deemed to be filled with the wrong waste. Local private residents do what they can to help with the waste management situation but the failure by some landlords and management agents to provide clear guidance and tenancy obligations leads to what has become an unacceptable situation and potential conflict. Periodic property refurbishment and the annual clear out of properties also tends to impact local residents due to construction noise, the number of contractors and the parking of skips on gardens, verges and the roads.</p>		

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HMO/173	Mr David Cass				Q1. Yes these represent my experiences, although I would add poor design and loss of amenity/greenspace.	3	Amenity Key Issues Own experience Support
HMO/174	Mr David Cass				<p>Key Issues – Under HMO Thresholds I would add the following comment:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should be a further layer of control so that the 10% figure should also not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	4	Object Policy HMO2 Concentrations and Thresholds

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HMO/183	Mrs Jillian Cass				Q1. Yes these represent my experiences, although I would add poor design and loss of amenity/greenspace.	3	Amenity Key Issues Own experience Support
HMO/184	Mrs Jillian Cass				<p>Key Issues – Under HMO Thresholds I would add the following comment:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should be a further layer of control so that the 10% figure should also not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	4	Object Policy HMO2 Concentrations and Thresholds

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HMO/3	Rebecca Thompson				If we continue without article 4, yet more small HMO developments will crop up and negatively impact certain areas. Article 4 is needed urgently to help balance housing and communities, but a consistent approach is needed - not just favouring the wards where residents shout loudest, already with a strong sense of identity. The provision of purpose built student accommodation appears to have made little difference- students and corporate lettings with their work vans seem to have taken over the area in the last 2-3 years	2	A4D Miscellaneous Policy HMO1 Homes in Multiple Occupation Support
HMO/15	Leah Tardivel				It's a good start. It may be too late. We've lost so many houses over the last year. We could do with more robust responses to noise and parking complaints in order to help to limit the issues associated with the existing homes. For example, in Argyll Street the lines are barely existent, no one will come out in a timely fashion to manage parking issues and noise complaints are so frequently ignored that they might as well not exist.	3	Policy HMO1 Homes in Multiple Occupation Support
HMO/28	None (Ms Janet Dixon)			None	Doing nothing is not acceptable. There must be some control over what developers can do to the properties in our areas and to ensure our communities survive and do not become streets of bedsits with a churning population.	3	Policy HMO1 Homes in Multiple Occupation Support

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HMO/38	Mr Keith Struthers				<p>The Iceni report does not mention the Cannon Park estate and Cannon Hill Road area at all, so is completely devoid of any evidence on these areas. Key relevant evidence has been supplied by Cannon Park Community Association to CCC officers listed in the DPD.</p> <p>At 40% HMO rate in Cannon Park there needs to be appropriate consideration of remaining local Council Tax paying, home owning residents. In addition to introduction of Article 4 Direction, use of thresholds and sandwiching, and review and application of policies DE1, H3 and H5 and NPPF 2019 must be made at every review of a planning application before the Planning Committee.</p>	6	Evidence base Object
HMO/48	Madelein Struthers				<p>Cannon Park Estate (CPE) is a mixture of terraced bungalows and houses, as well as individual bungalows and 2 storey houses on larger properties. In the Greens the HMO rate is 80%, Unacceptable.</p> <p>Article 4 Direction must be introduced to ensure that HMOs of 6 or less rooms require planning permission, to at least give some protection, but this needs to be combined with more stringent application of policies and NPPF by planning Committee.</p>	7	A4D Amenity Miscellaneous Own experience Policy HMO1 Homes in Multiple Occupation Support

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HMO/63	Ms Clair Henrywood				I worry that selecting just the wards listed could lead to a proliferation of hmos moving into the wards not included in the list to avoid "red tape". I have seen first hand how hmos are driving families out of areas. Would strongly recommend that the proposed changes are applied city-wide and not kept to the selected wards.	1	A4D Miscellaneous
HMO/68	Mr Jon Hodge				I would support an immediate introduction of Article 4 to appropriately manage the number and locations of HMOs	3	A4D Miscellaneous
HMO/79	The Coventry Society (Mr John Payne)			The Coventry Society	Yes I feel that this approach is reasonable and balanced.	5	Policy HMO1 Homes in Multiple Occupation Support
HMO/90	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-01 (Houses in Multiple Occupation)</b> which requires that all applications for HMOs would be required to demonstrate:</p> <p>a) There is good accessibility to local amenities and public transport;</p> <p>b) They accord with the emerging Accessible Homes Standards (or future equivalent) and provide satisfactory living</p>	2	Other Other Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<p>accommodation for intended occupiers; and</p> <p>c) There is no demonstrably adverse impact on the amenity of neighbouring properties or character of the area by way of character, appearance, highway safety and parking.</p> <p>The policy also requires that the application for HMOs meet the criteria in draft policy HMO-04.</p> <p>The CCWMP notes that there is some duplication / cross-over between Draft Policy HMO-01 and Draft Policy HMO-04, which both set out criteria against which an application for an HMO would be assessed. It is considered this is unnecessary and could lead to conflicts should the referenced standards become out of sync (for example, if the Accessible Homes Standard (once adopted) or a future equivalent were to conflict with specific accommodation standards referenced in Draft Policy HMO-04) with the effect of reducing the weight afforded to either policy. Commentary is provided on this matter under Question 5 below.</p> <p>Notwithstanding, the CCWMP supports the principle of Draft Policy HMO-01, that there should be clear standards against which future applications for HMOs should be considered. Furthermore, that these standards should include adequate provisions to design out crime, which is also addressed within our commentary under Question 5 below.</p>		



<b>Comment ID</b>	<b>Respondent Name</b>	<b>Agent Name</b>	<b>Agent Organisation</b>	<b>Respondent Organisation</b>	<b>Comment</b>	<b>Comment number by this respondent</b>	<b>Tags against this comment</b>
HMO/107	Mr David Swanson				<p>The proposed policy approach is supported subject to consistent application.</p> <p>Para 5.6 references the HMO licencing regime however, no reference is made to the fact that large numbers of HMOs continue to operate without being licensed, effectively taking them outside of the direct supervision of the council's licensing team. For some time, our local community association has been asking the University of Warwick and the CCC Licensing Authority to verify the actual number of properties being occupied as student accommodation (UoW records) and the number of HMO licenced properties on the CCC records. Only then will it be fully evident of the scale of HMO concentration in the local area.</p>	6	Evidence base Other
HMO/117	Mrs Joscelyne Bigham				<p>This approach is reasonable; however, there is a concern that some issues may be displaced to other areas as property developers seek to avoid Article 4 Direction. For example, there are streets within Longford which have housing similar to that described as 'small (three bedroom) terraced dwellings' and some are already HMOs. With its good transport connections and lower property values than in some other wards, Longford could easily become a target. Could Longford be added so this could be avoided?</p>	2	A4D Miscellaneous Policy HMO1 Homes in Multiple Occupation Support

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HMO/121	Cheryl Revill				Cannon Park Estate and Cannon Hill Road area are not mentioned at all in this document and have an ever increasing number of HMO properties and a large number of student accommodation.	2	Amenity Own experience
HMO/125	Mr Paul Newman				I believe the approach is correct. We need to have defined areas where permitted development is withdrawn for conversions to HMOs. We then need to back this up with solid planning rules which support the acceptance/rejection of any application. In the past we have seen applications being rejected by Coventry City Planning but these decisions have then been appealed to the National Inspectorate and overturned. We need new planning policies which are put in place in respect of all HMOs, i.e. smaller HMOs as well as larger HMOs.	2	Policy HMO1 Homes in Multiple Occupation Support
HMO/152	Philip Cowen				Yes, I agree the approach is reasonable. However, I am concerned that further houses could be converted before Autumn 2023 and that the approach does not help the situation that has been allowed to develop up to this point. Can the council require owners of existing HMOs looking to sell their properties convert them back into whole houses before doing so?	5	Key Issues Support
HMO/175	Mr David Cass				Q2. – This question is not clear, is it asking whether the proposals set out in draft policy HMO1 are reasonable? If so, yes.	5	Other Policy HMO1 Homes in Multiple

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							Occupation
HMO/185	Mrs Jillian Cass				Q2. – This question is not clear, is it asking whether the proposals set out in draft policy HMO1 are reasonable? If so, yes.	5	Other Policy HMO1 Homes in Multiple Occupation
HMO/4	Rebecca Thompson				What happens to properties already converted without certain planning permissions? Will there be a map of all HMOs (small and large) so the impact can be seen? What happens if a property is just outside 100m? In terraced housing this could make a big difference so needs to be measured as a proportion of homes rather than meters say if a large detached property is measured by 100m	3	Other Policy HMO2 Concentrations and Thresholds Support
HMO/20	Miss Cathy Pallister				I agree with the above, I feel there should be a set limit to state that no further HMOs can be given a planning application - it is personal but with many of the HMOs in my area, the whole fabric of the building is being ripped out, floors dropped to accomodate more rooms. These properties will never be returned to 'normal' domestic use - it is a shame as these Victorian houses are being ruined.	1	Policy HMO2 Concentrations and Thresholds Support
HMO/29	None (Ms Janet Dixon)			None	I support this approach.	4	Policy HMO2 Concentrations and Thresholds

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							Support
HMO/39	Mr Keith Struthers				The 100 m/thresholds rules should have been applied to Cannon Park estate and the Cannon Hill Road area from the outset. In roads such as Aldrin Way, precious adjacent family bungalows have been converted to HMOs with no consideration of the consequences to the remaining community. Article 4 Direction introduction in 2011 could have prevented this irrevocable loss of family homes if these rules and Council Planning policies had been applied.	7	A4D Miscellaneous Own experience
HMO/49	Madelein Struthers				For Cannon Park Estate (CPE) the above concentration and thresholds have been exceeded in so many situations. All these criteria and policies need to be applied, along with Article 4 Direction.	8	A4D Miscellaneous Policy HMO2 Concentrations and Thresholds Support
HMO/59	N/A (Mr Andrew McIntosh)			N/A	In General terms the proposal to limit HMOs is sensible, with the need to planning permission for small HMOs ensuring that adequate thought is given to the impacts on neighbourhoods. The criterion proposed of 10% of residences within a 100m radius may well be work efficiently for areas of denser housing such as terraced neighbourhoods, however this approach may well become a significant restriction when considered for areas which have less property density.	1	Policy HMO2 Concentrations and Thresholds Support

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					<p>For instance taking Wainbody as a example:</p> <p>This area contains a significant proportion of Semi-detached and detached housing many of which enjoy sizeable plots with off street parking. It is quite possible that the 10% criterion within a 100m radius would involve no more than 2 (or potentially 1) property being considered and so effectively equates to a ‘ban’ on all proposals in the areas that are best able to cope with the development. It would seem that applying the criterion on an entire ward level would not adequately take into account the differing nature property density both within wards and across the city.</p>		
HMO/64	Ms Clair Henrywood				I disagree with this as you are still providing the chance for an area to go over 10% - which is still too high a proliferation of hmos. You need to be tougher and stop the proliferation of hmos in residential areas.	2	Object Policy HMO2 Concentrations and Thresholds
HMO/69	Mr Jon Hodge				A concentration of 3% (5% max) for Moreall Meadows (Wainbody ward) would seem appropriate. There are some HMOs here that have caused some problems. The development is next to the university and as a family / older person area the mix / noise from students isn’t appropriate. There is a parking restriction for on road parking too, meaning there is a practical	4	Other Policy HMO2 Concentrations and Thresholds

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					limit to the number of cars that can be accommodated on drive ways.		
HMO/100	Mrs Debbie Williams				We are well over 10% concentration in the Cannon Park area so hopefully this proposal would mean no further conversions of use allowed.	3	Policy HMO2 Concentrations and Thresholds Support
HMO/109	Mr David Swanson				<p>The proposal set out in Draft Policy HMO2 is supported and will be effective at preventing over concentration of HMOs in mixed residential areas, although it would better if the policy was explicit about situations where the existing concentration is greater than 10% as is the case in the Cannon Park Estate (currently greater than 40% and in parts greater than 80%). It is also critical that the application of the policy and the assessment of concentrations are implemented consistently.</p> <p>The effectiveness of the policy will also be dependent on ensuring robust and effective enforcement supports the planning process. There is a worrying trend recently that sees developers starting, or indeed completing, works to convert and extend properties for HMO use before applying for planning permission, and relying the submission of a retrospective planning application to cover the works when options are frequently seen as more limited. To prevent developers attempting to circumnavigate the planning</p>	8	Policy HMO2 Concentrations and Thresholds Support

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					process, swift and effective enforcement will be required and, where necessary, positive action taken to force reinstatement of the property is planning approval cannot be granted due to non-compliance with the Article 4 Direction and/or the associated HMO policies.		
HMO/126	Mr Paul Newman				This is a clear policy and will stop any more HMOs being converted in our area as we already exceed this.	3	Policy HMO2 Concentrations and Thresholds Support
HMO/135	Mr Ian Stevenson				HMO applications that take the HMO concentration over the 10% threshold within 100m should also not be supported. This should also apply to non-campus PBSAs that are within 100m of residential properties.	2	Object Policy HMO2 Concentrations and Thresholds
HMO/153	Philip Cowen				Accurate data is essential for this to work. Thinking about Craven Street and surrounds I'm sure the concentration is already higher than 10% within 100 metres. How is the council going to ensure all HMOs are registered and known about to ensure this can be accurately applied?	6	Evidence base Support
HMO/166	CARTA (Miss Sian Thuraisingam)			CARTA	We agree that HMO thresholds should be in place. This provides	4	Policy HMO2 Concentrations and Thresholds

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					clear criteria which will be used to reject future HMO planning applications. In our area we believe the 10% level would prevent any further conversions given the number and location of existing HMOs.		Support
HMO/5	Rebecca Thompson				Could be dangerous if use the same rule for the ward and not in area pockets. For example, Charterhouse, which borders my area in lower Stoke, has many and my area is increasing, yet other areas of lower Stoke have few as they are further from town	4	Other Policy HMO2 Concentrations and Thresholds
HMO/16	Leah Tardivel				Why don't you want to reduce HMO numbers? Some areas just aren't suitable for HMO's. If HMO's are a valuable form of housing why aren't they being included in new build estates specifically designed to accommodate the parking and space needs? Why are they being left to squeeze into areas that just don't have the space to accommodate the infrastructure they need?	4	Other Policy HMO2 Concentrations and Thresholds
HMO/30	None (Ms Janet Dixon)			None	Yes this approach is reasonable.	5	Policy HMO2 Concentrations and Thresholds Support
HMO/50	Madelein Struthers				All criteria and policies cited must be applied to protect Cannon	9	Policy HMO3 Sandwiching Support



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					Park Estate, along with Article 4 Direction.		
HMO/70	Mr Jon Hodge				Yes, I support the introduction of the article 4 proposal, but would reduce the concentration to say 5% for areas that adjoin universities to encourage students to use the purpose built accommodation or live in areas where there are appropriate student facilities	5	A4D Miscellaneous Other Policy HMO2 Concentrations and Thresholds
HMO/91	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-02 (Concentrations and Thresholds)</b> which seeks to limit the concentration of HMOs in any one area by use of thresholds, these being:</p> <p>a) Where there is an existing HMO concentration of 10% or more of all dwellings within 100m radius of the centre point of an application property, HMO applications will not be supported; and</p> <p>b) Where there is an existing HMO concentration of less than 10% within 100m radius of the centre point of the application property, HMO applications will be considered against the other Policies in this DPD and all other relevant policies.</p> <p>The reasoned justification (paragraph 5.10) states that ‘For</p>	3	Other Policy HMO2 Concentrations and Thresholds Support

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					<p><i>neighbourhoods which exceed the threshold, no further applications to a C4 HMO dwelling, generated by the withdrawal of change of use permitted development rights would be permitted</i>'. This is a clear policy intent; however the policy wording is not as explicit, stating only that the application would not be 'supported' – it is suggested that the policy wording could be strengthened in line with the reasoned justification to state would not be 'permitted'.</p> <p>The CCWMP acknowledges the commentary with regards to 'exceptional circumstances' that may apply (DPD, paragraph 6.4) but notes that there is no provision for these within the wording of Draft Policy HMO-02, which we suggest is the most appropriate of the Draft Policies as the first filter of whether an HMO would be acceptable in principle.</p> <p>The CCWMP supports the principle of Draft Policy HMO-02, subject to the suggested amendments, which would serve to prevent the over-concentration of HMOs within an area and thereby reduce the potential for crime and disorder and to enhance community safety.</p>		
HMO/110	Mr David Swanson				<p>Whilst the implied link between HMO shared student housing and purpose built student accommodations set out in para 5.9 is not unreasonable, the recent construction and opening of the very large PBSA adjacent to Cannon Park Shopping Centre does not</p>	9	General Observation Statistical evidence

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					<p>seem to have resulted in any significant reduction in the conversion of family homes to HMOs on the Cannon Park Estate, despite assurances given during the Planning Committee consideration of the original PBSA submission. Where communities are hosting these PBSAs within their neighbourhood, the impact of these should also be a factor in assessing the suitability of further HMOs in the locality. A 800 room accommodation immediately adjacent to the Cannon Park Estate has its own impact on the demographics and diversity of the local community in situations such as places of worship, doctors and medical facilities, local retail shopping facilities, etc., and as such, should form part of the consideration of HMO applications in the future.</p> <p>The reference in para 5.11 to effectively blocking further C4 dwelling applications in areas which exceed the stated threshold is welcomed in the case of Cannon Park Estate and potentially in parts of the Cannon Hill Road locality although due consideration needs to be taken if the effect of such a policy leads to potential loss of value of properties in the area due to them become unsaleable as a result of the existing concentration of HMOs causing private buyers to focus their property searches elsewhere.</p>		
HMO/127	Mr Paul Newman				<p>This is policy reasonable and relevant. It will provide a clear rule to ensure that HMOs are not concentrated in certain areas and causing further imbalances.</p>	4	Policy HMO3 Sandwiching Support

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HMO/144	Mr Philip Bywater				<p>The proposals set out in draft policy HMO2 (HMO concentration and thresholds) are reasonable, however the threshold provision requires expansion, as follows:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should also be a further layer of control so that the 10% figure should not be exceeded within a 500 metre radius. This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	5	Other Policy HMO2 Concentrations and Thresholds Support
HMO/154	Philip Cowen				<p>I think it is relevant and reasonable. However, whether it addresses the issues is another story because of the number of properties already developed as HMOs. Maybe this policy in conjunction with policies to rejuvenate areas would work best.</p>	7	Other Policy HMO1 Homes in Multiple Occupation Support

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HMO/176	Mr David Cass				<p>Q3. - The proposals set out in draft policy HMO2 (HMO concentration and thresholds) are reasonable, however the threshold provision requires expansion, as follows:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should also be a further layer of control so that the 10% figure should not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	6	Other Policy HMO2 Concentrations and Thresholds Support
HMO/186	Mrs Jillian Cass				<p>Q3. - The proposals set out in draft policy HMO2 (HMO concentration and thresholds) are reasonable, however the threshold provision requires expansion, as follows:-</p>	6	Other Policy HMO2 Concentrations and Thresholds Support

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					<p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should also be a further layer of control so that the 10% figure should not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>		
HMO/22	Miss Cathy Pallister				<p>This sandwiching is something that concerns me greatly, I already have HMSOs adjacent, behind and opposite me. Once my elderley neighbour is no longet here, I feel it will be sold to a developer, I will then feel totally surrounded by such properties, this is a big worry for residents tthat own their own homes</p>	3	<p>Amenity Own experience Policy HMO3 Sandwiching Support</p>

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HMO/31	None (Ms Janet Dixon)			None	This is very important. Sandwiching is a real issue causing distress for those affected.	6	Policy HMO3 Sandwiching Support
HMO/51	Madelein Struthers				On Cannon Park estate (CPE) sandwiching has been exceed in so many areas, it is astonishing. Such criteria were never considered by Planning Committee.	10	
HMO/61	N/A (Mr Andrew McIntosh)			N/A	It would appear ‘Sandwiching’ is only relevant to high density housing areas. This should not be a consideration for lower density areas.	2	Other Policy HMO3 Sandwiching
HMO/71	Mr Jon Hodge				Agree	6	Policy HMO3 Sandwiching Support
HMO/108	Mr David Swanson				<p>The policy proposals set out in Draft Policy HM03 are supported. The fact that the policy suggests that no more than a one in four HMO concentration within a single street would seem to be a reasonable balance between the need to protect the local residents amenity and the need for providing HMO based accommodation.</p> <p>As previously stated, these policy provisions are perhaps too late to protect against the impact of over intensification of HMOs in</p>	7	Policy HMO3 Sandwiching Support

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					the Cannon Park Estate community but should protect against further intensification going forward, so long as the policy is consistently applied.		
HMO/128	Mr Paul Newman				This is a clear policy.	5	Policy HMO3 Sandwiching Support
HMO/129	Mr Paul Newman				This is a clear policy. It will hopefully ensure that there is a more even balance of property types in an area	6	Policy HMO3 Sandwiching Support
HMO/155	Philip Cowen				I agree with this and other possible combinations.	8	Policy HMO3 Sandwiching Support
HMO/167	CARTA (Miss Sian Thuraisingam)			CARTA	We also agree that sandwiching should be considered as part of planning criteria. Again, this is clearly defined and we believe that this will ensure an appropriate balance of housing. We believe a number of properties operating as HMOs would not have been allowed under this criteria if Article 4/this DPD had already been in place at time of conversion.	5	Policy HMO3 Sandwiching Support
HMO/23	Miss Cathy Pallister				I feel the policy approach is reasonable regarding sandwiching	4	Policy HMO3 Sandwiching Support



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HMO/52	Madelein Struthers				On Cannon Park Estate at a HMO rate of 40%, the amenity of neighbouring residents is compromised in so many areas. It has to STOP. Article 4 must be made part of that process.	11	A4D Miscellaneous
HMO/92	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-03 (Sandwiching)</b> which seeks to prevent an over concentration of HMOs, specifically by avoiding non-HMO dwellings being sandwiched between two HMOs or a continuous frontage of three or more HMOs, and defines sandwiching as including:</p> <p>a) Up to three single residential properties in a street located between two single HMO properties;</p> <p>b) Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;</p> <p>c) A residential flat within a sub-divided building where the majority of flats are HMOs;</p> <p>d) A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;</p> <p>e) A residential flat within a sub-divided building located between two flats above and below; and</p>	4	Policy HMO3 Sandwiching Support

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					<p>f) A residential flat within a sub-divided building located between two HMO flats on both sides.</p> <p>CCWMP supports the principle of Draft Policy HMO-03 and consider this would serve to prevent the over-concentration of HMOs at the neighbourhood/street level, as affecting individual residents, supporting a better balance and integration of HMO occupancy within a residential area, reduce the potential for crime and disorder, and enhance community safety.</p>		
HMO/111	Mr David Swanson				The proposed approach to sandwiching is supported and should provide the means to prevent over intensification of HMOs in a specific street, if it is applied consistently.	10	Policy HMO3 Sandwiching Support
HMO/130	Mr Paul Newman				This is policy reasonable and relevant. It will help to ensure that there a balance of properties in the given area.	7	Policy HMO3 Sandwiching Support
HMO/156	Philip Cowen				Yes, I agree with this approach. Many residents who are unable to move will undoubtedly feel apprehensive and concerned about adjacent houses being converted to HMOs. This is especially true of older residents and those that cannot afford or don't want to move out of the area they may have lived in for a long time. Maybe the policy could ask how a developer plans to minimise	9	Amenity General Observation Policy HMO1 Homes in Multiple Occupation Support

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					the disruption to immediate neighbours not only while a property is being developed but once occupied as an HMO. The developer should be required to meet with the neighbours to share their views.		
HMO/177	Mr David Cass				Q4. - The proposals set out in draft policy HMO3 (HMO sandwiching) are reasonable.	7	Policy HMO3 Sandwiching Support
HMO/187	Mrs Jillian Cass				Q4. - The proposals set out in draft policy HMO3 (HMO sandwiching) are reasonable.	7	Policy HMO3 Sandwiching Support
HMO/6	Rebecca Thompson				Great, but again, those properties already recently converted with bins constantly on the pavement and wrong things in them? What action will be taken ?	5	Policy HMO4 Amenity and Design Support
HMO/24	Miss Cathy Pallister				Refuse bins are a massive issue so I agree with the refuse part above, it should be mandatory	5	Amenity General Observation Policy HMO4 Amenity and Design Support

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HMO/32	None (Ms Janet Dixon)			None	I agree with the criteria listed above.	7	Policy HMO4 Amenity and Design Support
HMO/40	Mr Keith Struthers				For the Cannon Park/Cannon Hill road area, the concern expressed by home owning residents about their experience with refuse bins and refuse disposal was never addressed at Planning committee meetings. Apart from concerns of these residents, there is indifference to the state of some HMO areas. This needs to be rectified.	8	Amenity Own experience Policy HMO4 Amenity and Design Support
HMO/53	Madelein Struthers				On Cannon Park Estate, one of the main problems that local residents face is the state of refuse bins at HMOs. This is often unacceptable, This consequence is ignored by Planning Committee.	12	Amenity Amenity General Observation Own experience
HMO/62	N/A (Mr Andrew McIntosh)			N/A	Points (a) to (f) would seem to sensible criterion, but could be subject to significant amount of interpretation. Impacts on “amenity” and “character” are very subjective. It is simply too prescriptive to assume that higher numbers of residents will lead to impacts of “activity, noise and disturbance”.  HMOs are an important and necessary part of the housing mix, and this policy should not seek to discriminate against those who	3	Policy HMO4 Amenity and Design Support

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					they legitimately serve through the imposition of 'NIMBY' like criterion.		
HMO/72	Mr Jon Hodge				Suggest parking is specifically included as a criteria.	7	Other Policy HMO4 Amenity and Design
HMO/112	Mr David Swanson				<p>The proposals contained within Draft HMO4 are supported, subject to them being applied consistently and being robustly enforced through the planning process, including internal inspection where necessary to confirm the application of planning proposals as submitted.</p> <p>As mention previously in these comments, the need for effective management of waste is of particular importance. The simple provision of refuse bin storage does not resolve the problem of mismanagement of waste in many HMO properties. There is a need to link waste management obligations to an effective HMO licencing regime with appropriate sanctions and penalties is required to ensure waste is better managed than is the case today at many properties.</p>	11	Policy HMO4 Amenity and Design Support
HMO/118	Mrs Joscelyne Bigham				Could the following be considered for adding to the criteria for amenity and design?	3	Other Policy HMO4 Amenity and

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					<ul style="list-style-type: none"> <li>• Secure facilities for receiving post. The HMO on the corner of Woodshire's Road and Wilson's Lane has fittings placed onto a boundary fence lining the street. Is this acceptable?</li> <li>• Placement of additional pipes, satellite dishes and wiring on the outside of the building especially on street frontages.</li> <li>• Sensitive use of building materials for creating extensions or conversion of public houses/shop frontages. The Old Crown on Windmill Road is a good example of where the developer has carefully selected materials to match the original design and use of the building. The HMO on the corner of Woodshire's Road and Wilson's Lane illustrates the opposite. There are different types of bricks laid in different patterns (running vs Flemish bond), different cornicing/eaves, different style and size of windows (including lintels and ledges), etc.</li> <li>• Parking spaces marked out for each resident. These spaces should be large enough for taxi cabs and vans which residents may need to use for work.</li> <li>• Provision for residents to be able to store food and cook on the premises.</li> <li>• Provision of laundry facilities for residents to wash and dry their clothes on the premises (including secure outdoor areas).</li> <li>• Modern heating systems and use of insulation.</li> </ul>		Design

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					<ul style="list-style-type: none"> <li>• Fire alarms, doors and exits.</li> <li>• Security features such as building access, CCTV, lighting, windows, locks, etc.</li> <li>• Details of landscaping where there are gardens and/or plans for provision/contribution towards public open space within the wider area.</li> </ul>		
HMO/131	Mr Paul Newman				<p>The character of our area has changed because of the number of HMOs and the transient nature of the tenants.</p> <p>Our area does not have the capacity to accept anymore conversions and the additional parking needs relating to the larger number of people in a property.</p>	8	Amenity Own experience
HMO/136	Mr Ian Stevenson				<p>Travel routes - including cycling and pedestrian - should not adversely affect existing areas. This is especially true of PBSAs that are located close to residential areas and may generate through traffic, including anti-social behaviour in the evenings.</p>	3	Amenity General Observation
HMO/157	Philip Cowen				<p>Agree with these. Also, it should not be possible to convert a house to an HMO near places of entertainment such as pubs and venues as this could subsequently threaten the businesses existence if complaints about noise were forthcoming.</p>	10	Policy HMO4 Amenity and Design Support

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HMO/168	CARTA (Miss Sian Thuraisingam)			CARTA	<p>We agree with the above policy. The points of particular relevance to the CARTA area are:</p> <ol style="list-style-type: none"> <li>1. b) impact of HMOs on the character of our conservation area</li> <li>2. e) adequate vehicular and cycle parking – parking is on street and the frontages of properties are very narrow – the area cannot support the cumulative effect of the additional number of tenants in HMOs</li> </ol>	6	Policy HMO4 Amenity and Design Support
HMO/7	Rebecca Thompson				<p>With limited powers, this approach seems most sensible than relying on the local plan which is already out of date and cannot control what is done with existing housing stock</p>	6	Other Policy HMO4 Amenity and Design Support
HMO/41	Mr Keith Struthers				<p>In addition to an introduced Article 4 Direction, everything must be done to protect the previous character of the neighbourhood. 6 room HMOs have been converted, with extremely unsightly black waste pipes installed on the outside of what was previously an external lounge wall, in view of an immediate neighbouring property. Article 4 Direction with proper Planning Committee review could have rejected this development.</p> <p>None of this is mentioned in the Icen report</p>	9	A4D Miscellaneous Policy HMO4 Amenity and Design Support



Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/54	Madelein Struthers				On Cannon Park Estate, introduction of Article 4 Direction must work in conjunction with CCC policies, NPPF, correct use of thresholds and sandwiching to do something to curtail the unacceptable situation here.	13	A4D Miscellaneous
HMO/73	Mr Jon Hodge				I would make the restrictions for concentration of HMOs in the areas near / next to the universities more restrictive to redirect the risk of further HMO growth into surrounding areas.	8	Other Policy HMO4 Amenity and Design Support
HMO/80	The Coventry Society (Mr John Payne)			The Coventry Society	Yes I feel that the policy might bring these problems under control.	6	Policy HMO4 Amenity and Design Support
HMO/93	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-04 (Amenity and Design)</b> which sets out the criteria by which applications for HMOs will be assessed, comprising:</p> <p>a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated;</p> <p>b) There would be no demonstrably adverse impact on the amenity of neighbouring properties and character of the surrounding area in particular through increased activity, noise or</p>	5	Other Policy HMO4 Amenity and Design Support

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					<p>disturbance;</p> <p>c) The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements* and light and ventilation;</p> <p>d) The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation;</p> <p>e) The design of external space is safe and secure, and includes provision for refuse storage, washing facilities and adequate vehicular and cycle parking <sup>(3)</sup> and ensures access to outdoor amenity space; and</p> <p>f) Refuse bin storage is provided externally within the curtilage of the property, within suitably designed structure and the refuse bin not visible form the public realm.</p> <p><i>* 6.51m<sup>2</sup> for one person over ten years of age, 10.22m<sup>2</sup> for two persons over ten years of age and 4.65m<sup>2</sup> for one child under the age of ten years. Any room of less than 4.64m<sup>2</sup> must not be used as sleeping accommodation <sup>(4)</sup>.</i></p> <p><i>Footnote (3) refers to the standards in the adopted Local Plan 2011-2031</i></p>		

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					<p><i>Footnote (4) refers to figures based on the City Council's HMO Licencing Standards</i></p> <p>Whilst the CCWMP is supportive of the design considerations expressed within Draft Policy HMO-04 concerns are raised that there is no explicit reference to the need for HMOs to meet the 'Secured by Design' standards. Secured by Design is the official UK Police Service initiative, the adoption of which improves the security of building and their immediate surroundings and covers a range of relevant matters including layout, dwelling boundaries, rear access footpaths, climbing aids, vehicle parking, cycle storage, planting, entry management, windows, lighting as well as CCTV and door entry systems.</p> <p>Secured by Design (SBD) and Designing Out Crime (DOC) are the most sustainable and therefore the most cost-effective of all crime reduction interventions, with little or no evidence of displacement of crime and far more likely to lead to benefits to surrounding areas.</p> <p>Over the past two decades, independent, academic assessments have demonstrated that developments which attain the Secured by Design (SBD) award maintain long term, sustainable reductions in recorded crime. The CCWM's flagship project, 'The Four Towers' at Duddeston Manor, in nearby Birmingham has maintained a 98.7% reduction (as based on the figures for 1988) in domestic burglary for over 20 years, whilst reductions in other</p>		

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					<p>property crime categories replicate the research findings of Armitage and others, some of which are listed below:</p> <ul style="list-style-type: none"> <li>• Dr Rachel Armitage in 1999 found 50% fewer burglaries and 25% fewer vehicle crimes and criminal damage reports;</li> <li>• Glasgow Housing Corporation project refurbishing to SBD standards resulted in 65% burglary reduction;</li> <li>• Armitage R and Monchuk L in 2009 re-evaluated previous research and researched new SBD sites and found burglary levels in original SBD sites (1999) were 62% down, and burglary levels in the newest SBD developments were 75% down.</li> </ul> <p>Most recently, Police Scotland's Stuart Ward showcased the success of SBD in Scotland at a National Training Event in 2019, where he reported an 87% reduction in crime in SBD properties in East Central Scotland over the last 18 years based on a study in the Fife area. This study analysed data from more than 150 Kingdom Housing Association developments and showed a significant drop in crimes on the SBD developments compared to non-SBD developments between 1997 and 2015. The study showed that the 3,000 homes built to the SBD standard have had 87% fewer crimes recorded.</p> <p>At least seven evaluations of SBD have all found greatly reduced crime levels. Policies which support the need for development to</p>		

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					<p>be SBD would accord with the requirements of the NPPF.</p> <p>The ‘broken windows theory’ links disorder and incivility within a community to subsequent occurrences of serious crime. Any visible signs of crime and civil disorder, such as broken windows, vandalism, loitering, public drinking, and transportation fare evasion, can create an urban environment that promotes even more crime and disorder. (Wilson &amp; Kelling, 1982).</p> <p>The CCWMP has evidence that where there is a lack of maintenance, this can quickly lead to a spiral of decline/neglect if not addressed quickly and effectively. The CCWMP believes the need to design out crime and ensure its continued maintenance in all new developments and redevelopments is a cornerstone to successful sustainable communities including with HMO properties.</p> <p>Examples of crime prevention initiatives of particular relevance to HMO developments include the need for:</p> <ul style="list-style-type: none"> <li>• Adequate lighting for internal and external communal areas and access(es).</li> <li>• Doors into internal private spaces to be of external access door standard to provide safe and secure areas for individuals in their homes reducing opportunities for theft, intimidation, violence, disorder and fear of crime.</li> <li>• Controlled and regulated access into the properties,</li> </ul>		

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					<p>including into any separate buildings within the shared communal outdoor space to reduce the risk of unauthorised entry with associated opportunities for crime.</p> <p><b>The CCWMP formally requests that explicit reference is made within the Policy HMO-04 to:</b></p> <ul style="list-style-type: none"> <li>• <b>The need to consult with Design Out Crime Officers (DOCO) at the pre-application and planning application stage;</b></li> <li>• <b>The need for all proposals to meet Secured by Design principles; and</b></li> <li>• <b>The need for a management plan which specifically addresses the need for crime prevention measures to be maintained.</b></li> </ul> <p>The CCWMP is concerned that HMO can provide an unsafe environment for residents within these developments if they fail to meet SBD Standards and/or if they are not properly maintained to a standard which will reduce the risk of crime, antisocial behaviours, and the fear of crime.</p> <p>In addition, (and as noted under Question 2) we note that there is some duplication / cross-over between Draft Policy HMO-01 and Draft Policy HMO-04. We consider to be unnecessary and could lead to conflicts should the relevant referenced standards become</p>		

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<p>out of sync, reducing the weight afforded to either policy.</p> <p>It is suggested this could be avoided by integrating the requirements of HMO-01 into HMO-04, specifically with regards to:</p> <ol style="list-style-type: none"> <li>a. The appropriateness of the location – the specifics in respect of the accessibility to local services and public transport could be integrated into Policy HMO-04 point (a).</li> <li>b. The living standards of future occupiers – the reference to the emerging Accessible Homes standards or its future equivalent could be integrated into Policy HMO-04 point (c), although see note below.</li> <li>c. The protection of residential amenity in respect of character, appearance, highway safety and parking – the specifics of which could be integrated into Policy HMO-04 points (b), (e) and (f) as appropriate.</li> </ol> <p>The explicit space standards as referenced within this Policy, (i.e., footnote *) are also questioned, noting that the m<sup>2</sup> areas are less than those expressed within the Nationally Described Space Standards (DCLG, March 2015) which require that: '<i>c) in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m<sup>2</sup> and is at least 2.15m wide</i>' and '<i>d) in order to provide two bedspaces, a double (or twin bedroom) has a floor</i></p>		

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<p><i>area of at least 11.5m<sup>2</sup></i>. This could lead to unsatisfactory living accommodation, with subsequent effects on the health and well-being of individuals and thereby their future potential.</p> <p>Accordingly, the CCWMP supports the principle of Draft Policy HMO-04, subject to the inclusion of the requirement for HMOs to meet the Secured By Design standards, and considerations as set out above. It is considered that these amendments would deliver an improved quality of accommodation and include specific measures to reduce the potential for crime and disorder and to enhance public safety.</p>		
HMO/113	Mr David Swanson				<p>The justification provided is reasonable and probably supports the draft policy in so far as it can.</p> <p>The issue of management of waste has already been discussed in these comments. Similarly, the maintenance of HMOs has also cause for concern, particularly the too frequent absence of front garden maintenance on Cannon Park Estate properties. Once again, the need to ensure appropriate maintenance is carried out to an acceptable standard should be part of the HMO Licencing regime with suitable penalties for failure to comply. This is particularly important where HMOs are mixed with owner occupier properties as poor property and garden maintenance can directly affect the look, feel and amenity benefit of adjacent</p>	12	Amenity General Observation



<b>Comment ID</b>	<b>Respondent Name</b>	<b>Agent Name</b>	<b>Agent Organisation</b>	<b>Respondent Organisation</b>	<b>Comment</b>	<b>Comment number by this respondent</b>	<b>Tags against this comment</b>
					properties.		
HMO/132	Mr Paul Newman				This is policy reasonable and relevant. The implications of increased parking need should be considered.	9	Policy HMO4 Amenity and Design Support
HMO/158	Philip Cowen				Yes, the council should continue to work with the universities to help educate students on their responsibilities when living in HMOs in the community. The purpose built student accommodation is extremely expensive and I have no doubt that students may start opting to live in HMOs instead in greater numbers.	11	Key Issues Support
HMO/178	Mr David Cass				Q5. - The proposals set out in draft policy HMO4 (amenity and design issues) are reasonable but there should be a minimum requirement for amenity/green space.	8	Policy HMO4 Amenity and Design Support
HMO/188	Mrs Jillian Cass				Q5. - The proposals set out in draft policy HMO4 (amenity and design issues) are reasonable but there should be a minimum requirement for amenity/green space.	8	Policy HMO4 Amenity and Design Support

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/17	Leah Tardivel				Many of the properties in this area, while not HMOs are also short term lets. This will compound some of the issues. Electoral registers could help identify areas which are already lacking stability and where the effect of an extra HMO would be greater than inserting it into a more stable neighbourhood.	5	Assessment process Other
HMO/25	Miss Cathy Pallister				reasonable, but less HMOs is better in the longterm - trying to get more families into the area would help local communities	6	Assessment process Support
HMO/55	Madelein Struthers				The assessment process is reasonable, but should have been applied in its entirety at least a decade ago. There has been no application of thresholds, sandwiching which has led to the dramatic social degradation of the previous family orientated, cosmopolitan estate.	14	Assessment process Support
HMO/74	Mr Jon Hodge				Reasonable, allowing for the other criteria to be considered.	9	Assessment process Support
HMO/81	The Coventry Society (Mr John Payne)			The Coventry Society	Yes I think that the assessment process is reasonable and relevant in addressing the problems. However I am concerned about paragraph 6.4. Even if the neighbourhood is characterised by dominance of HMOs, further increase in such properties will only	7	Assessment process Other Support

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					make matters worse to the detriment of existing residents, including HMO tenants.		
HMO/114	Mr David Swanson				The assessment process proposed is broadly supported with the exception of para 6.4 which may potentially be applied in the case of Cannon Park Estate (>40% HMO concentration). The wording used in the case of Exceptional Circumstances is far too loose and open to interpretation. Even where the existing HMO concentration is high, each and every new proposal must be subjected to rigorous planning scrutiny and the views of local residents must be taken into account. The consideration of such proposals must include an assessment against each of the HMO policies and, if any policy is not being met a full justification for setting aside that policy must form part of the planning application documentation and be open to objection by affected neighbours and the local community.	13	Assessment process Other Support
HMO/120	Mrs Joscelyne Bigham				<p>Could there also be a requirement for the following information to be submitted:</p> <ul style="list-style-type: none"> <li>• Provision of toilets and washing facilities.</li> <li>• Location(s) for food storage and cooking facilities.</li> <li>• Laundry facilities and indoor/outdoor areas for clothes drying.</li> </ul>	4	Assessment process Other

Comment	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					<ul style="list-style-type: none"> <li>• Heating systems and access to hot water.</li> <li>• Position of fire alarms, doors and exits.</li> <li>• Building materials.</li> <li>• Security alarms, cameras and lighting.</li> </ul>		
HMO/133	Mr Paul Newman				<p>Within the process for counting HMOs you have included “Council tax records - student exemptions for council tax excluding purpose built student accommodation and private flats.” If there are properties which have student exemptions, don’t these require HMO licences (if they are “tenanted by 3 or more unrelated persons forming two or more households and sharing basic amenities”), i.e. wouldn’t they already be covered under other bullet points. If they have a student exemption and are operating as HMOs without a licence then I would expect that they would need to apply for planning permission.</p> <p>Section 6.4 ”exceptional circumstances”, must be reworded to provide a clear definition of “vast majority” in “This is because the vast majority of properties are already in HMO use”. It should have a defined percentage of properties and area as with Policy HMO2. If this section is reworded to provide clear definitions then this is appropriate - it should not provide a loop hole for developers to be able to convert properties, or for them to appeal to Planning Inspectorate.</p>	10	Assessment process Object

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/159	Philip Cowen				Yes, this seems like a good starting point moving forward but it does not address existing areas with many HMOs already in place. Measures should be taken to improve these areas and where possible bring houses back into family use.	12	Amenity Assessment process General Observation Other
HMO/169	CARTA (Miss Sian Thuraisingam)			CARTA	<b>This part of the DPD is of concern.</b> Unlike the previous draft policies this is not specific. This exceptional circumstances section would provide a loophole for developers unless the “vast majority” criteria is clearly defined. At the very least we believe that there should be an automatic exemption from applying this rule if the HMO in question is in a conservation area.  <b>We strongly urge this wording to be changed.</b>	7	Assessment process Object
HMO/179	Mr David Cass				Q6. – The proposed assessment process is reasonable, with the exception of the proposals set out for ‘Exceptional Circumstances’. This is effectively ‘throwing the towel in’ and is totally unacceptable. The proposed policy, together with my proposed amendment to concentrations, should be applied fully and without exception.	9	Assessment process Object
HMO/189	Mrs Jillian Cass				Q6. – The proposed assessment process is reasonable, with the exception of the proposals set out for ‘Exceptional	9	Assessment process Object

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
					Circumstances'. This is effectively 'throwing the towel in' and is totally unacceptable. The proposed policy, together with my proposed amendment to concentrations, should be applied fully and without exception.		

Report run at 23 Jan 2023 14:53:02. Total records: 190

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## Public report Cabinet

Scrutiny Co-ordination Committee  
Cabinet  
Council

14 March 2023  
14 March 2023  
21 March 2023

**Name of Cabinet Member:**

Cabinet Member for Policy and Leadership – Councillor G Duggins

**Director approving submission of the report:**

Interim Chief Executive (Chief Partnerships Officer)

**Ward(s) affected:**

All

**Title:**

One Coventry Plan 2022-2030

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**Is this a key decision?**

No – The Council Plan forms part of the Policy Framework and is a matter for Full Council to determine.

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**Executive summary:**

The current Council Plan, the One Coventry Plan, was initially agreed in 2014 for a ten-year period (ending in 2024) and was last refreshed in 2016. In 2021, work began to refresh the Council Plan to reflect the emerging priorities for the Council and the city.

From February to September 2022, extensive engagement was undertaken with the Council workforce, partners and the wider public regarding the delivery of the priorities outlined in the draft Plan. This engagement created the opportunity to understand more about how the priorities could be meaningfully delivered in a way that builds on our achievements and recognises the challenges faced by the city. Critically, we wanted to understand what successful delivery would look like for our residents, communities and key stakeholders.

The refreshed One Coventry Plan 2022-2030 provides the strategic direction for the Council and the One Coventry vision of “working together to improve our city and the lives of those who live, work and study here”. It sets out the Council’s priorities and focuses on enabling people to live their best lives in a vibrant and prosperous city.

The report seeks approval for the adoption of the refreshed priorities, provides an overview of the engagement approach taken, an update on the findings and a summary of how local people’s views have impacted the development of the One Coventry Plan.

**Recommendations:**

Scrutiny Co-ordination Committee is asked to:

- 1) Consider the engagement feedback received.
- 2) Forward any comments and/or recommendations to the Cabinet for consideration.

Cabinet is asked to:

- 1) Consider any recommendations from Scrutiny Co-ordination Committee.
- 2) Consider the outcome of the engagement and the resulting equality impacts (see Equality Impact Assessment – Appendix A to the report).
- 3) Approve the refreshed One Coventry Plan 2022-2030 (Appendix B to the report) for submission to Council on 21<sup>st</sup> March 2023.
- 4) Authorise the Interim Chief Executive (Chief Partnerships Officer), following consultation with the Leader, to make such minor amendments to the refreshed One Coventry Plan 2022-2030 as considered necessary in advance of it being presented to Council for approval.
- 5) Recommend that Council approves the refreshed One Coventry Plan 2022-2030 (Appendix B to the report) for adoption as the Council Plan.

Council is asked to:

- 1) Approve the refreshed One Coventry Plan 2022-2030 (Appendix B to the report) for adoption as the Council Plan.

**List of Appendices included:**

The following appendices are attached to the report:

Appendix A – One Coventry Plan Equality Impact Assessment  
Appendix B – One Coventry Plan 2022-2030  
Appendix C – Summary of Engagement Feedback on the One Coventry Plan

**Background papers:**

None

**Other useful documents:**

One Coventry Plan Annual Performance Report 2021-2022  
One Coventry Plan Performance Management Framework 2022  
Corporate Risk Register – September 2022

**Has it or will it be considered by scrutiny?**

Yes – Scrutiny Co-ordination Committee on 14 March 2023

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

No

**Will this report go to Council?**

Yes – 21 March 2023

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## Report title: One Coventry Plan 2022-2030

### 1. Context (or background)

1.1. The refreshed One Coventry Plan 2022-2030 (Appendix B) sets out our vision and priorities for the city, based on our commitments to the people of Coventry and the things that residents have told us are most important. The Plan builds on the progress that has been made since the current plan was last updated in 2016, the challenges faced and anticipated, and emerging opportunities.

1.2. One Coventry vision and priorities for the city:

**Vision: One Coventry – Working together to improve our city and the lives of those who live, work and study here.**

**Priorities: One Coventry Plan 2022-2030**



1.3. The Plan sets out how these priorities will be delivered between now and 2030 and outlines our key enablers, our measures of success and the role that residents and partners will have in supporting the delivery of these priorities.

### 2. Options considered and recommended proposal

2.1. **Option 1 (recommended)** – Cabinet and Council are recommended to support the Council in delivering the priorities which are outlined in the refreshed One Coventry Plan 2022-2030. The refreshed One Coventry Plan has been developed in response to engagement feedback received and the Council is confident that its contents are reflective of what is important to Coventry residents and others who work or study in the city.

2.2. **Option 2** – The current Council Plan 2016-2024, its existing vision and priorities for the city could be updated but it is considered that too many changes would be needed for this to be a viable option.

2.3. **Option 3** – The current Council Plan 2016-2024 could remain in place for the full duration of its current term and be reviewed at the end of 2024. However, this would potentially result in the Council having a Plan in place that is not reflective of current priorities.

### 3. Engagement approach

3.1. In February 2022, a wide range of innovative engagement activity commenced to actively seek the views of residents, including children and young people, communities, partners, the Council workforce, Elected Members and Trade Unions. A vast range of opportunities were created for local people to share their thoughts about the city and our priorities for the future and views were encouraged in any format.

- 3.2. The engagement approach was innovative, accessible and iterative. Our ultimate ambition was to reach out to our communities and talk and listen to as many people as possible.
- 3.3. New and creative engagement tools were introduced in different and accessible formats, including videos and competitions, which simplified our approach in response to what people told us works best for them. We posed a simple question ('What will the Coventry of 2030 look and feel like to you?'), to remove barriers and enable open responses that were not restricted by the Council's position.
- 3.4. Engagement was promoted to our workforce through the Intranet, the Council's Staff App, One Coventry Newsletter and at team meetings. Council employees were asked to champion engagement within their teams and encourage their colleagues to access a workforce toolkit (created to enable engagement), attend a workshop and/or complete the survey or share their views in other ways.
- 3.5. The internet and social media channels were used to reach out to the local online community. Messages were conveyed through the use of digital screens (for example in the city centre, Family Hubs and Job Shop). A professional One Coventry Plan video was created to highlight the Council's priorities and encourage discussion and was shared on multiple platforms. Information was also available in a hard-copy format at multiple venues across the city and on the Council's website.
- 3.6. The engagement was promoted directly through stakeholder network groups and by attending existing community events as an opportunity to engage directly with our communities, in community settings. Many of the engagement activities were planned, however there were also ad hoc opportunities, for example getting out and talking to people to understand their views about the 'Coventry of 2030'.
- 3.7. During the engagement period, Scrutiny Co-ordination Committee provided feedback regarding the engagement approach. Scrutiny Members made a series of recommendations including one relating to the role of Members in supporting the engagement approach. Materials were made available for distribution across the city, including leaflets, surveys and pre-paid envelopes to encourage responses.
- 3.8. Additional ways to increase our engagement were also implemented, including engaging with communities in religious settings and care homes (for example, we liaised with our faith networks and 2 poster competitions for children and young people were judged by tenants in one of the care homes in the city). Targeted social media adverts were created, via Facebook, to extend our social media reach.
- 3.9. In summary, this activity has been the most comprehensive engagement undertaken across the Council to date. Over 3,500 people actively shared their views, we reached over 250,000 people via social media, held over 20 workshops and spoke directly to over 740 residents at local events including Sports Fest and the Godiva Festival.
- 3.10. People of all ages were keen to be involved and have their say and we have received rich feedback and insight into what matters most to our residents. As a result, the Council is as confident as it can be that the Plan is reflective of what is important to our residents and others who work or study in the city.

#### 4. Engagement findings and post-engagement review of draft One Coventry Plan

- 4.1. All feedback received during the engagement period has been reviewed and a summary of the engagement feedback, including identified themes, has been appended to this report (Appendix C).
- 4.2. Following the engagement period, the delivery statements in the draft Plan were reviewed against the engagement findings and amendments were made to the Plan based on the feedback received. The majority of the statements in the draft Plan were supported by engagement, however the Plan narrative and delivery intentions were strengthened in some areas including the narrative around communication, engagement and collaboration, and also regarding equality, diversity and inclusion.
- 4.3. In particular, we amended the One Coventry Plan following feedback on the priorities (see section 4.4-4.8).

#### 4.4. Priority: Improving the economic prosperity of the city and region

**Vision** – By delivering this priority we will create a city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created.

We have amended the One Coventry Plan following feedback on this key priority by:

- Expanding our commitment to ensure pathways to employment for young people to include adults with mental ill health, disabilities, carers and new migrants to the city, young people from diverse and minority-ethnic backgrounds.
- Being clear that we will, where possible, prioritise jobs and skills for local people and utilise local small businesses and source local materials when delivering projects.
- Committing to ensuring that our transport infrastructure not only attracts investment but is also sustainable and inclusive with an improved public transport network.
- Including a commitment to ensure our city centre remains clean and tidy and offers a diverse range of experiences for residents and visitors.
- Being clear that we will utilise our tender criteria to capture social value commitments that align to our [Social Value & Sustainability Policy](#)

#### 4.5. Priority: Improving outcomes and tackling inequalities within our communities

**Vision** – By delivering this priority we will create a city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities.

We have amended the One Coventry Plan following feedback on this key priority by:

- Being clearer in our commitment to tackle violence and abuse in all forms.
- Strengthening our intent to narrow and close the gap in education performance measures for vulnerable groups at each phase.

#### 4.6. Priority: Tackling the causes and consequences of climate change

**Vision** – By delivering this priority we will create a city, that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change.

We have amended the One Coventry Plan following feedback on this key priority by:

- Including a commitment to encourage green behaviours and work with schools to implement sustainability into the curriculum.
- Stressing the importance of protecting wildlife and engaging with communities and developers on the conservation of natural habitats.
- Being clearer about the need to address the impacts and consequences of Climate Change by ensuring we have the right infrastructure in place to cope with the effects of extreme weather events such as flooding and extreme heat.

4.7. **Priority: Continued financial sustainability of the Council**

**Vision** – We will enable delivery of our priorities by being a Council with a strong and sustainable financial position, with resources and assets that are aligned with our priorities.

We have amended the One Coventry Plan following feedback on this enabling priority by:

- Being clear about the importance of financial plans meeting the needs of residents.
- Strengthening the importance of an engaged, inclusive and diverse workforce and being an employer of choice.
- Including a commitment to work collaboratively across service boundaries and optimise a whole council approach.

4.8. **Priority: Council's role as a partner, enabler and leader**

**Vision** – We will enable delivery of our priorities by being a Council that plays a key role as a civic leader, working in genuine partnership with local residents, communities and partners.

We have amended the One Coventry Plan following feedback on this enabling priority by:

- Stressing the importance of engaging and listening to residents, communities, businesses and partners to ensure a One Coventry approach and demonstrating our values in all our interactions.
- Being clearer about our commitment to enable local people to determine solutions that best meet their needs.
- Adding a commitment to work with partners to increase access to activities for children and young people within the city.

4.9. Furthermore, the Council has begun to reflect on these findings and suggestions for each priority area in order to determine specific responses to the feedback. Information will be shared on how we are responding over the coming months.

4.10. Current and future Plan performance reporting measures were reviewed against engagement findings to ensure they will provide a sufficient measure of delivery against the updated One Coventry Plan priorities. Work is in progress to ensure the continued ability to measure delivery of the priorities set out in the One Coventry Plan 2022-2030.

## 5. **Delivery of the One Coventry Plan priorities and objectives – Next steps**

5.1. The One Coventry Plan narrative is being used to shape our work across the city. The engagement feedback has been shared with service areas and through partnerships to inform current service delivery and strategic planning for the future. The priorities are being



embedded and aligned to key strategies and the Council is in the process of mobilising a clear delivery strategy for the three key priorities.

- 5.2. The Council will continue making the best use of resources in order to enable delivery of the One Coventry Plan, to be informed by the One Coventry Plan priorities, data, insight and the resident voice. The Council will simultaneously continue to deliver its core services to the residents and businesses of the city.

#### Ongoing engagement and communication

- 5.3. Coventry City Council is committed to continuous listening and undertaking ongoing engagement on the delivery of One Coventry Plan priorities and involving residents and our local communities in how services are provided and developed. The One Coventry Plan 2022-2030 provides the perfect opportunity for residents and communities to be part of a continued conversation, thus ensuring that the resident voice remains at the heart of how we collectively deliver our priorities for the city.
- 5.4. A leaflet and poster will be produced to share high-level engagement results, inform people about how further information can be accessed and invite ongoing discussion around the delivery of the Council's priorities. These materials will be available in Council buildings such as Family Hubs and Libraries. Information will also be available on the Council's website and on social media.
- 5.5. A [One Coventry Plan feedback](https://letstalk.coventry.gov.uk/hub-page/one-coventry-plan-hub) hub has been designed on Let's Talk Coventry – <https://letstalk.coventry.gov.uk/hub-page/one-coventry-plan-hub>. A discussion forum will enable people to continue to contribute their thoughts on how we work together to achieve our priorities and will also advertise other forthcoming engagement opportunities.

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

If the recommendations set out in this report are approved, implementation of the One Coventry Plan will commence with immediate effect.

### **7. Comments from Interim Chief Executive (Section 151 Officer) and Chief Legal Officer**

#### 7.1 Financial Implications

Delivery of the Council's priorities contained within the One Coventry Plan 2022-2030 will have an impact on the Council's overall financial position. However, there are no direct financial implications from this report.

#### 7.2 Legal Implications

Schedule 4 of The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 ("**the Regulations**") sets out circumstances in which functions are not to be the responsibility of an Authority's Executive. One such circumstance relates to the adoption or approval of a plan or strategy (whether statutory or non-statutory) where the authority determines that the decision whether the plan or strategy should be adopted or approved should be taken by them.

Part 2C of the Council's Constitution sets out functions which will be the responsibility of Full Council which also includes approving or adopting the Policy Framework and the Budget. The One Coventry Plan 2022-2030 will form part of the Council's Policy Framework and as such

must also be approved by Full Council in compliance with the provisions of the Regulations and the Council's Constitution.

## **8. Other implications**

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

Not applicable – this report relates to the refresh of the existing Council Plan 2016-2024. The refreshed One Coventry Plan identifies the priorities for the Council between 2022-2030 and provides the framework upon which Council plans and other key strategy documents can be developed.

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

The management of risk associated with the development and delivery of the One Coventry Plan will be identified and monitored through the Council's performance management framework. The annual performance report helps the Council manage risk by measuring and reviewing progress in relation to the priorities of the One Coventry Plan. The Council's performance will be monitored against a comprehensive set of performance indicators, as well as using qualitative data and real-life stories. Findings will be published annually including areas where we are making good progress, areas where progress is not as expected, and areas where the Council needs to take corrective action.

Any known risks that exceed the Council's risk appetite are recorded on the Corporate Risk Register, which is also aligned to the Plan priorities.

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

As the key strategic document for the Council, the One Coventry Plan will impact across all areas of the Council's work.

### **8.4. Equalities / EIA?**

The Council is required, by the Local Authority Act 2010, to comply with the Public Sector Equality Duty. An Equality Impact Assessment for the One Coventry Plan has been conducted (Appendix A) to ensure that we have given proper consideration to the Equality Duty, including having due regard to the need to advance equality of opportunity between people who share a protected characteristic and those who do not share a protected characteristic.

Coventry City Council is committed to making a positive difference to the lives of local people and to promoting equality of opportunity for its residents. The One Coventry Plan has a clear focus on equality, with one of the three key priorities specifically focusing on improving outcomes and tackling inequalities within our communities.

Progress against the priorities will be reported through the Council's performance management framework and, where applicable, will include analysis by key equality groups/areas.

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

Tackling the causes and consequences of climate change is one of the three key priorities in the One Coventry Plan 2022-2030. A draft climate change strategy is in the process of being refreshed and has been informed by the One Coventry Plan engagement feedback. The

Council will continue to report on progress relating to specific measures set out in the Plan such as air quality, energy use and carbon dioxide emissions.

#### **8.6. Implications for partner organisations?**

Our One Coventry vision and approach focus on how we work together with residents, communities and partners to improve our city and the lives of those who live, work and study here. The Council continues to work in collaboration with our residents, local communities and partners, including the One Coventry Partnership, to deliver the vision and priorities for the city.

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Debbie Horton-Rayner	Programme Manager	Transformation Team	03/02/2023	06/02/2023
Grace Haynes	Head of People and Culture – Relationships and Development	Human Resources	03/02/2023	08/02/2023
Jade McKenna	Communications Lead	Communications	03/02/2023	07/02/2023
Jaspal Mann	Equalities and Diversity Officer	Public Health Insight Team	07/02/2023	07/02/2023
Kristi Larsen	Lead Officer Consultation	Public Health Insight Team	03/02/2023	07/02/2023
Lisa Lawson	Adult Services Programme Delivery Manager	Adult Services	03/02/2023	09/02/2023
Mamta Kumar	Equalities and Diversity Assistant	Public Health Insight Team	09/02/2023	10/02/2023
Michelle Salmon	Governance Services Officer	Law and Governance	08/02/2023	08/02/2023
Oluremi Aremu	Head of Legal and Procurement services	Law and Governance	03/02/2023	07/02/2023
Paul Jennings	Finance Manager	Finance	03/02/2023	06/02/2023
Roger Martin	Insurance Manager	Insurance Services	03/02/2023	07/02/2023
Valerie De Souza	Consultant, Public Health	Public Health	03/02/2023	07/02/2023
Vanessa Millar	Change Manager	Transformation Team	03/02/2023	06/02/2023
<b>Approvers:</b>				
Allison Duggal	Director of Public Health and Wellbeing	-	10/02/2023	16/02/2023
Andrew Walster	Director of Streetscene and Regulatory Services	-	10/02/2023	16/02/2023
Andy Williams	Director of Business, Investment and Culture	-	10/02/2023	16/02/2023

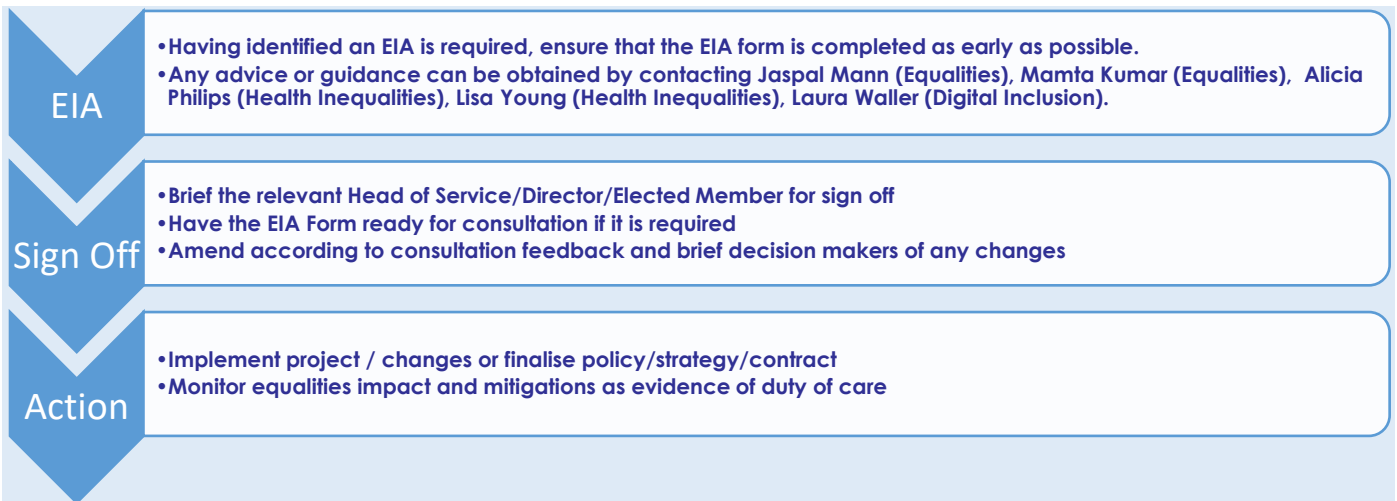
Colin Knight	Director of Transportation and Highways	-	10/02/2023	16/02/2023
John Gregg	Director of Children's Services	-	10/02/2023	13/02/2023
Marc Greenwood	Policy and Public Affairs Lead	Policy and Public Affairs	10/02/2023	15/02/2023
Nigel Hart	Head of Communications	Communications	10/02/2023	16/02/2023
Paul Ward	Head of ICT and Digital	Human Resources	10/02/2023	16/02/2023
Richard Moon	Director of Property Services and Development	-	10/02/2023	15/02/2023
Sue Newing	Chief People Officer	-	10/02/2023	16/02/2023
<b>Names of approvers for submission:</b> (officers and members)				
Barry Hastie	Interim Chief Executive (Section 151 Officer)	-	10/02/2023	16/02/2023
Julie Newman	Chief Legal Officer	-	07/02/2023	07/02/2023
Kirston Nelson	Interim Chief Executive (Chief Partnerships Officer)	-	10/02/2023	16/02/2023
Councillor G Duggins	Cabinet Member for Policy and Leadership	-	16/02/2023	20/02/2023

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<b>Title of EIA</b>		One Coventry Plan 2022-2030
<b>EIA Author</b>	Name	Vanessa Millar
	Position	Change Manager
	Date of completion	02/02/23
<b>Head of Service</b>	Name	Michelle McGinty
	Position	Strategic Lead for Transformation and Change
<b>Cabinet Member</b>	Name	Councillor George Duggins
	Portfolio	Cabinet Member for Policy & Leadership



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?

The current Council Plan, the One Coventry Plan, was initially agreed in 2014 for a ten-year period (ending in 2024) and was last updated in 2016. In 2021, work began to refresh the Council Plan to reflect the emerging priorities for the Council and the city.

The refreshed One Coventry Plan 2022-2030 provides the strategic direction, vision and priorities for the Council, and reflects the aspirations for Coventry to be a better place. It focuses on enabling people to live their best lives in a vibrant and prosperous city.

In summary, the One Coventry Plan priorities are as follows:

- Increasing the economic prosperity of the city and region
- Improving outcomes and tackling inequalities within our communities
- Tackling the causes and consequences of climate change

These will be supported by our enabling priorities:

- Continued financial sustainability of the Council
- Council’s role as a partner, enabler and leader

The One Coventry Plan sets out how these priorities will be delivered between now and 2030 and outlines our key enablers, our measures of success and the role that residents and partners will have in supporting the delivery of these priorities.

Please see One Coventry Plan 2022-2030.

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

Key stakeholders include:

- Local residents and communities in Coventry
- Coventry City Council’s workforce
- Elected Members
- Trade Unions
- Partner organisations including:
  - Coventry University
  - University of Warwick
  - Coventry College
  - University Hospitals Coventry and Warwickshire
  - Coventry and Warwickshire Partnership Trust
  - Coventry and Warwickshire Integrated Care Service
  - West Midlands Fire Service
  - West Midlands Police
  - Coventry City of Culture Trust
  - Citizen
  - Chamber of Commerce
  - Other representatives from the One Coventry Partnership
- Voluntary and community sector organisations
- Businesses





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

- One Coventry Leadership Team
- Individual service areas will have responsibility for delivering aspects of the One Coventry Plan. Service areas will be responsible for implementing this EIA, as appropriate.

SECTION 2 – Consideration of Impact

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

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

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

2.1 Baseline data and information

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

Baseline data (pre-engagement) – November 2021

Coventry is a culturally and ethnically diverse city and there are significant challenges in reducing inequality in the city:

- 14.4% of Coventry neighbourhoods are amongst the 10% most deprived in England. These areas experience multiple levels of deprivation – low skills, low incomes and relatively high levels of crime. People from these areas can expect to live on average six years less than those in the more affluent areas.
- Life expectancy at birth in Coventry for 2017-19 was 82.2 years for females and 78.7 years for males, both of which were notably lower than the England average; not to mention the wide gap which means someone living in amongst the city’s more deprived neighbourhoods die on average 10 years younger than a person living in amongst the city’s least deprived neighbourhoods. The impact of investment in housing, services and public realm over the life of the previous Plan is evident but there is more to do to enable everyone to contribute to, and benefit from, social and economic development so that growth is truly inclusive.



- Although there has been an improvement in the number of residents who now have a qualification level 4 or above, there still remain pockets of deprivation which limit people's opportunities to succeed in life, with 7% of the city's working age population having no qualifications at all. This may limit their ability to gain more rewarding employment in the city or push them to be redeployed as the economy rapidly changes, and the city's new jobs increasingly require qualified people.
- In the 2011 Census, 33% of the population identified as people of Black and Minority Ethnic (BME) background, compared to 22% in 2001.

Updated – February 2023

**This Equality Impact Assessment has been updated post-engagement and, as a result, includes latest Census 2021 data which is now publicly available:**

### **Coventry's population**

The population of Coventry has increased by 8.9%, from around 317,000 in 2011 to around 345,300 in 2021. Since the last census in 2011 the overall population in Coventry has increased by a greater percentage than the overall population of both the West Midlands (up by 6.2%) and England (up by 6.6%).

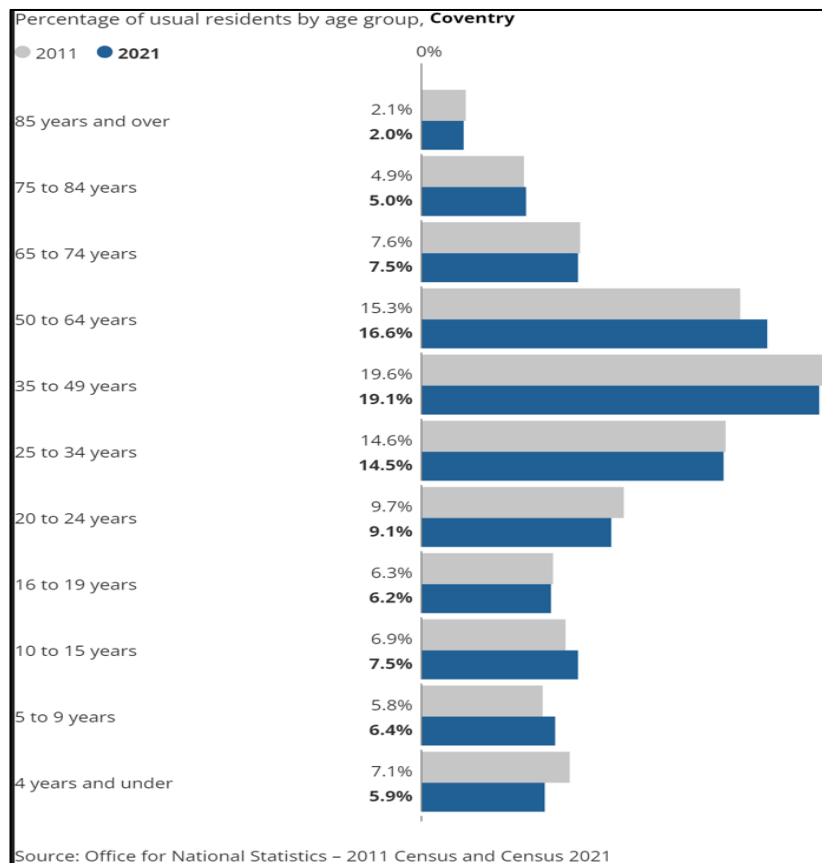
### **Median age in Coventry**

Between the last two census the median age of Coventry has increased to 35 years. The median age is the age of the person in the middle of the group, meaning that one half of the group is younger than that person and the other half is older.

The number of people aged between 50 to 64 years rose by around 8,800, an increase of 18.2%, while the number of residents aged 4 years and under decreased by around 2,000 - which equates to around 9.0%.



See graph below:



### Ethnic groups in Coventry

In 2021, 8.9% of Coventry residents identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category, up from 5.6% in 2011. The 3.3 percentage-point change was the largest increase among high-level ethnic groups in this area.

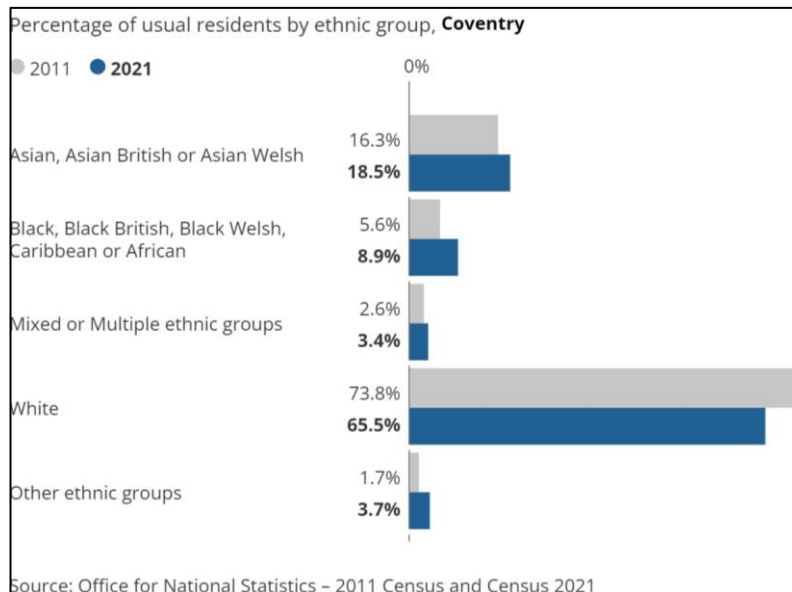
In 2021, 65.5% of people in Coventry identified their ethnic group within the "White" category (compared with 73.8% in 2011), while 18.5% identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 16.3% the previous decade).

The percentage of people who identified their ethnic group within the "Other" category ("Arab" or "Any other ethnic group") increased from 1.7% in 2011 to 3.7% in 2021.

There are many factors that may be contributing to the changing ethnic composition of England and Wales, such as differing patterns of ageing, fertility, mortality, and migration. Changes may also be caused by differences in the way individuals chose to self-identify between censuses.



See graph below:



### Country of Birth

In the latest census, around 242,100 Coventry residents said they were born in England. This represented 70.1% of Coventry’s population. The figure has risen from just over 240,100 in 2011, which at the time represented 75.8% of Coventry's population.

India was the next most represented, with just over 15,600 Coventry residents reporting this country of birth (4.5%). This figure was up from just over 13,400 in 2011, which at the time represented 4.2% of the population of Coventry.

The number of Coventry residents born in Poland rose from around 6,400 in 2011 (2.0% of the local population) to just under 8,900 in 2021 (2.6%).

### Religion in Coventry

In 2021, 29.6% of Coventry residents reported having "No religion", up from 23.0% in 2011. The rise of 6.6 percentage points was the largest increase of all broad religious groups in Coventry.

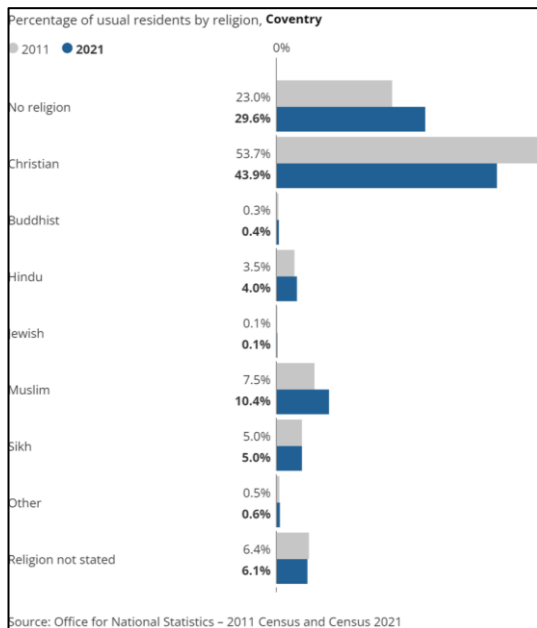
43.9% of people in Coventry described themselves as Christian (down from 53.7%), while 10.4% described themselves as Muslim (up from 7.5% the decade before).

There are many factors that can cause changes to the religious profile of an area, such as a changing age structure or residents relocating for work or education. Changes may also be caused by differences



in the way individuals chose to self-identify between censuses. Religious affiliation is the religion with which a person connects or identifies, rather than their beliefs or religious practice.

See graph below:



**Sexual Orientation in Coventry** – Figures to be added at a later date.

**Gender Identity in Coventry**

For the first time, the 2021 census asked residents aged 16 and over about their Gender Identify with one voluntary question.

In Coventry, 91.6% of eligible residents (276,873) indicated that their gender identity was the same as their sex registered at birth, 7.6% did not answer the question and 0.8% that it was different, this is higher than the 0.5% in the West Midlands and England.

Source: Office for National Statistics – 2011 Census and Census 2021

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	<p>The refreshed One Coventry Plan has a focus on all Coventry residents of all age groups.</p> <p>There is a focus on outcomes for children and young people, recognising specific issues identified through data analysis around school readiness, educational attainment including those children most affected by disruption to their learning due to the pandemic, young people’s mental health and well-being.</p> <p>Data shows that social inequalities are established from the early years of life and the Plan therefore seeks to build on existing early intervention models and will seek to support vulnerable families through integrated early help, education partnership work and by implementing the Family Valued programme 2021-2023.</p>
Age 19-64	P	It is anticipated that the outcomes of the Plan will have positive impacts on this age group indirectly.
Age 65+	P	The Plan addresses the preventative health needs of the growing older population, with over 65s expected to accelerate and outpace other groups within 10-15 years and seeks to respond to the potential impacts on health and wellbeing. It proposes a focus on enabling people to remain healthy and independent for longer.
Disability	P	The strategy has a focus on helping and supporting the vulnerable groups and improving access to services. Through the priority of ‘improving outcomes and tackling inequalities within our communities’, it proposes a focus on how the Council works with partners to enable people to remain healthy and independent for longer; Increasing Special Educational Needs and Disability places in the city; and people living in better connected communities which all speak directly to addressing the needs of people with disabilities and long-term conditions.
Gender reassignment	P	The Plan is clear that it will assist and support those who are disadvantaged, which may be those who are Transgender. Those



		who are LGBTQ+ experience inequalities, which the Plan seeks to address.
Marriage and Civil Partnership	<b>NI</b>	There is nothing proposed in the Plan that will impact either positively or negatively on people as a result of them being married or in a Civil Partnership.
Pregnancy and maternity	<b>P</b>	<p>The Plan explicitly seeks to improve outcomes for children and young people, taking an approach that prioritises prevention and seeks to address the inequalities in relation to education, health housing and the physical environment.</p> <p>It is anticipated that the outcomes of the Plan will have positive impacts, pre-birth, indirectly.</p>
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>P</b>	<p>In the 2011 census, 33% of the population identified as people of Black and Minority Ethnic (BME) background, compared to 22% in 2001 and it is likely that the population has become even more diverse in recent years since 2011. The city is expected to become more diverse, with nearly half of Coventry pupils from BME backgrounds.</p> <p>The Plan seeks to address inequalities, which sometimes relate to race. For example, data shows that pupils with a Black Caribbean ethnic background are amongst the groups that are lower performing at KS2; and there are inequalities in employment, with residents of White British ethnicity having higher employment rates than amongst residents from BME backgrounds overall.</p>
Religion and belief	<b>NI</b>	There is nothing proposed in the Plan that will impact either positively or negatively on people as a result of their religion or belief. Those of particular religions/beliefs may also be aligned to other categories, such as pregnancy/maternity, disability or race.
Sex	<b>P</b>	It is anticipated that the outcomes of the Plan will have positive impacts on all Coventry residents, both male and female, indirectly.
Sexual orientation	<b>P</b>	The Plan is clear that it will assist and support those who are disadvantaged. People who are LGBTQ+ experience inequalities, which the Plan seeks to address.



HEALTH INEQUALITIES

<p><b>2.3</b></p>	<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> <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	
<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>Health inequalities arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and how we think, feel and act, and this shapes our mental health, physical health and wellbeing.</p> <p>For example, action on health inequalities requires specific action across all of the social determinants of health. This includes education, employment, income, home and community.</p> <p>In Coventry, the impact of investment in housing, services and public realm over the life of the previous Plan is evident but there is more to do to enable everyone</p>	





to contribute to, and benefit from, social and economic development so that growth is truly inclusive.

### Data

Life expectancy at birth in Coventry for 2017- 19 was 82.2 years for females and 78.7 years for males, both of which were notably lower than the England average; not to mention the wide gap which means someone living in amongst the city's more deprived neighbourhoods die on average 10 years younger than a person living in amongst the city's least deprived neighbourhoods.

There is also a difference in life expectancy and in healthy life expectancy between males and females. Life expectancy in the city is currently 82.4 years for females and 78.3 for males; healthy life expectancy is at 63.5 years for females and 62.9 for males. In Coventry, females can expect to live almost a quarter of their lives in poor health (18.9 years) whilst males can expect to live just over a fifth of their lives in poor health (15.4 years). Males living in less deprived parts of the city can expect to live up to 10 years longer; and for females, the gap is 8 years.

### **Health in Coventry**

In 2021, 44.5% of Coventry residents described their health as "very good", increasing from 41.3% in 2011. Those describing their health as "good" fell from 35.7% to 34.9%. These are age-standardised proportions.

The proportion of Coventry residents describing their health as "very bad" was 1.5% (similar to 2011), while those describing their health as "bad" fell from 5.6% to 4.8%.

This data reflects people's own opinions in describing their overall health on a five point scale, from very good to very bad. Census 2021 was conducted during the Covid-19 pandemic. This may have influenced how people perceived and rated their health, and therefore may have affected how people chose to respond.

### **Employment in Coventry**

51.0% said they were employed (excluding full-time students) in 2021, a similar percentage as in 2011 (50.9%). In 2021, just over 1 in 30 (3.4%) said they were unemployed, compared with 4.9% in 2011. The percentage of retired Coventry residents decreased from 19.1% to 17.3%.

Census 2021 took place during the coronavirus (COVID-19) pandemic, a period of rapid and unparalleled change; the national lockdown, associated guidance and furlough measures will have affected the labour market and the ONS's ability to measure it.



<p><b>Rise in private renting and decrease in home ownership</b></p> <p>In Coventry, the percentage of private renting increased from 20.6% in 2011 to 24.7% in 2021. The rate of social renting in Coventry remained at 17.0%, while the rate of home ownership decreased from 60.6% to 57.4%.</p> <p>Please also see baseline data section (pages 3-8).</p> <p><u>Cost of Living Crisis</u></p> <p>Improving outcomes and tackling inequalities within our communities and improving the economic prosperity of the city and region will both help mitigate against the Cost of Living crisis in the medium to long term.</p> <p>Specific outcomes that will have a direct impact include (but not limited to):</p> <ul style="list-style-type: none"> <li>• More residents in employment, education, or training, including school leavers, and people facing significant disadvantages (improving outcomes)</li> <li>• Improvements in educational achievement and progress to destinations of choice of our children and young people (improving outcomes)</li> <li>• Sustainable, growing and prosperous economy (economy)</li> <li>• People accessing training opportunities and getting into and remaining in employment (economy)</li> <li>• More education and training opportunities available for young people aged 16+ (economy)</li> <li>• Levels of poverty and deprivation in the city decreasing (economy)</li> <li>• Increased investment in the city, attracting more new businesses (economy)</li> </ul>	
<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>Improving outcomes and tackling inequalities is one of the three key priorities within the One Coventry Plan. We are focusing on improving outcomes for local people and tackling inequalities in order to build prosperity across the city, protecting the most vulnerable and supporting and valuing the contribution of our</p>



residents. We will do this by, but not limited to, effectively delivering the essential services that matter most to our communities (we have rich engagement feedback to help understand our resident views) and strengthening our Marmot City approach to ensure it remains at the heart of what we do (Coventry is a Marmot City). There are also system wide programmes of work which contribute to this priority.

The wider determinants of health, for example, where we live, work, grow and age will impact on our physical and mental health. The One Coventry Plan will positively impact upon tackling health inequalities including using the Marmot approach; all of the priorities within the Plan seek to address the various socio-economic factors that lead to health inequalities, with a particular focus on vulnerable groups e.g. homeless, refugee and migrant communities, and those on low incomes.

Tackling the causes and consequences of climate change is another key priority within the One Coventry Plan. We want to ensure the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change. We want to have a relentless focus on tackling the causes of climate change and mitigating the inevitable consequences of this, which help to ensure the well-being of our residents and position Coventry as a leader and pioneer of the green industrial revolution.

As detailed in the One Coventry Plan, people value the quality of the environment in Coventry. We want to continue to promote the use of our parks and green spaces, helping to create connections between communities and promoting physical activity.

We also want to address inequalities exacerbated by the effects of climate change such as unemployment, fuel and food poverty, air quality and access to open space with associated impacts on health & wellbeing. For example, air pollution is a significant problem in Coventry and contributes to poor health. This disproportionately affects the poorest and most vulnerable in our communities – things that can be addressed only by working with partners to reduce nitrogen dioxide (NO<sub>2</sub>) emissions, and by nudging changes in behaviour such as promoting active and greener travel.

Please see One Coventry Plan for further information.

We are aware that many factors combine to create health inequalities between different groups of the population. Whilst health care services have an impact, other factors such as where people live, income, education, life experiences, behaviours and choices, along with relationships with friends and family, all have a considerable impact. People facing poorer social circumstances are more at risk of having multiple risk factors, exacerbating avoidable differences in health.



- 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.

Various socio-economic factors are not spread equally throughout the population, resulting in some groups experiencing multiple disadvantages throughout their lives. People facing these circumstances are more at risk of having multiple risk factors, exacerbating avoidable differences in health. All of the priorities within the Plan seek to address the various socio-economic factors that lead to health inequalities, with a particular focus on vulnerable groups e.g. people experiencing homelessness, refugee and migrant communities, and those on low incomes.

In particular, we are focusing on improving outcomes for local people and tackling inequalities in order to build prosperity across the city, protecting the most vulnerable and supporting and valuing the contribution of our residents.

One of the delivery statements in the refreshed Plan is specifically focused on supporting socially excluded or vulnerable groups; including people who are street homeless, experiencing mental ill health and the integration of our refugee and migrant communities.

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

As part of the ongoing analysis of performance management information, following the implementation of the One Coventry Plan, data will be reviewed on an ongoing basis to both measure performance and identify if there are any unintended impacts being experienced by people with protected characteristics. While, it is not expected that delivery will negatively impact any people with protected characteristics, if unintended impacts are identified, mitigations will be considered and implemented where appropriate.

Performance and impact data will continue to be reported on an annual basis as part of a performance report. This will be shared with partners, including but not limited to One Coventry Partnership and Marmot Partnership, and available publically.

**DIGITAL INCLUSION**

<b>2.5</b>	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
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<p>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 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>No, our work does not assume that service users have digital access and skills. We want our residents and communities to help us deliver this Plan by accessing</p>



	<p>services digitally where possible, however we know that not everyone will have digital access and skills to be able to use our services in this way.</p> <p>The One Coventry Plan highlights our intention to improve digital inclusion to empower local people to access further opportunities through digital means, whilst also developing their digital skills to be able to meet the needs of businesses expanding in our city.</p> <p>Children and young people are key to the future of the city, and we want Coventry to be a place where every child can thrive and has the opportunity to fulfil their potential.</p> <p>From a digital perspective, outcomes should not vary, regardless of whether people have the means to access services digitally or not.</p>
<p>2.5b How will you mitigate against digital inequalities?</p>	<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>Not applicable.</p>

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

<p>The development and delivery of the One Coventry Plan will be monitored and reported through the Council’s performance management framework.</p> <p>The One Coventry Plan annual performance report helps the Council manage risk by measuring and reviewing progress in relation to the priorities of the One Coventry Plan. The Council’s performance will be monitored against a comprehensive set of performance indicators, as well as using qualitative data and real-life stories. Where applicable, this will include analysis by key equality groups/areas.</p> <p>Findings will be published annually including areas where we are making good progress, areas where progress is not as expected, and areas where the Council needs to take corrective action.</p> <p>Any unintended impacts would be reviewed and corrective action would be taken, as necessary.</p> <p><u>Summary of Engagement and Next Steps</u></p> <p>From February to September 2022, extensive engagement was undertaken with the Council workforce, partners and the wider public regarding the delivery of the priorities outlined in the draft Plan. This engagement created the opportunity to understand more about how the priorities could be meaningfully delivered in a way that builds on our achievements and recognises the challenges faced by the city. Critically, we wanted to understand what successful delivery would look like for our residents, communities and key stakeholders.</p>
---



Following the engagement period, the delivery statements in the draft Plan were reviewed against the engagement findings and amendments were made to the Plan based on the feedback received. The majority of the statements in the draft Plan were supported by engagement, however the Plan narrative and delivery intentions were strengthened in some areas including the narrative around communication, engagement and collaboration, and also regarding equality, diversity and inclusion.

Coventry City Council is committed to continuous listening and undertaking ongoing engagement on the delivery of One Coventry Plan priorities and involving residents and our local communities in how services are provided and developed. The One Coventry Plan 2022-2030 provides the perfect opportunity for residents and communities to be part of a continued conversation, thus ensuring that the resident voice remains at the heart of how we collectively deliver our priorities for the city.

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

Coventry City Council is committed to making a positive difference to the lives of local people and to promoting equality of opportunity for its residents. The One Coventry Plan has a clear focus on equality, with one of the three key priorities specifically focusing on improving outcomes and tackling inequalities within our communities.

Coventry has a diverse population and therefore positive impacts may be felt by Council employees from protected groups, depending on individual circumstances.

Potential impacts will continue to be monitored as the One Coventry Plan is implemented.

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	
-----------	--



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

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

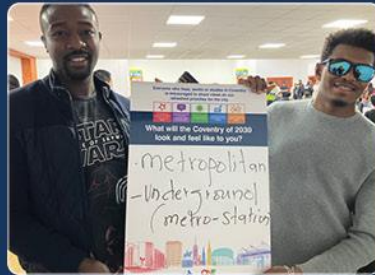
<b>Signed: Head of Service:</b>  <b>Michelle McGinty</b>	<b>Date:</b>  <b>16/02/2023</b>
<b>Name of Director:</b>  <b>Kirston Nelson</b>	<b>Date sent to Director:</b>  <b>16/02/2023</b>
<b>Name of Lead Elected Member:</b>  <b>Councillor George Duggins</b>	<b>Date sent to Councillor:</b>  <b>20/02/2023</b>

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



# One Coventry Plan

## 2022-2030



# One Coventry Plan 2022-2030

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# Introduction

Coventry City Council's 'One Coventry Plan' sets out our vision and priorities for the city, based on our commitments to the people of Coventry and the things that residents have told us are most important. It is more focused on the needs and aspirations of our communities than ever before. The Plan builds on the progress that has been made since it was last updated in 2016, the challenges faced and anticipated; and emerging opportunities.

For many residents, the Council represents the people who empty their bins, maintain the parks and roads, keep the streetlights on, look after older people, vulnerable children, and support people who are homeless, etc. These are all essential services and a significant part of what we do. However, we also play a key role in improving the city and making it a better place to live and work – this plan sets out how we intend to do this in the decade ahead.

The role of the Council is changing; and the narrative of this Plan sets out clearly the things that we can and cannot do, as well as the things that can only be delivered if we all play our part and work together to ensure that Coventry continues to be a great city.

## Our strengths, challenges, and opportunities

In refreshing the One Coventry Plan for 2022-2030, we have sought to respond to and build upon the following strengths, challenges and opportunities:

### The Coventry economy

Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors,

including advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional & financial services; digital, creative, and gaming. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures.

### The impact of the pandemic

The impact continues to be felt, as furlough and income support measures stifled the economic impact. The Office for Budget Responsibility's reference scenario predicts that because of the nature of its economic base, the West Midlands is likely to be one of the worst-affected regions.

### An ageing population

Historically, Coventry has been one of the youngest cities in the UK, with a fast-growing population of young adults aged 18-29 and a median age of 32 years compared to the UK average of 40. In the coming years, this is expected to change rapidly, with the 65+ age group expected to become the fastest-growing demographic over the next 15 years. As of 2020, people aged 75+ represent just 6% of the city's population, compared to the UK average of 9%; but by 2043, the proportion of people aged 75+ is expected to grow to nearly 8%. This has implications for many services, especially rising demand for health and social care services. At the same time, there are major opportunities to draw on the experience and talents of older people.

### Health inequalities

The challenge of reducing health inequalities in Coventry remains – that is, reducing the avoidable differences in health outcomes for our residents. Life expectancy at birth in Coventry for 2017-19 was 82.2 years for females and 78.7

years for males, both of which were notably lower than the England average; not to mention the wide gap which means someone living in amongst the city's more deprived neighbourhoods die on average 10 years younger than a person living in amongst the city's least deprived neighbourhoods. The impact of investment in housing, services and public realm over the life of the previous Plan is evident but there is more to do to enable everyone to contribute to, and benefit from, social and economic development so that growth is truly inclusive.

### Environment

People value the quality of the environment in Coventry. The city boasts five parks which have been awarded the Green Flag Award for nine consecutive years. We want to continue to promote the use of our parks and green spaces, helping to create connections between communities and promoting physical activity.

However, air pollution is a significant problem in Coventry and contributes to poor health. This disproportionately affects the poorest and most vulnerable in our communities – things that can be addressed only by working with partners to reduce nitrogen dioxide (NO<sub>2</sub>) emissions, and by nudging changes in behaviour such as promoting active and greener travel.

### Skills and education

Although there has been an improvement in the number of residents who now have a qualification level 4 or above, there still remain pockets of deprivation which limit people's opportunities to succeed in life, with 7% of the city's working age population having no qualifications at all. This may limit their ability to gain more rewarding employment in the city or push them to be redeployed as the economy rapidly changes, and the city's new jobs increasingly require qualified people. Alongside this, we need to improve digital inclusion to empower local people to

access further opportunities through digital means, whilst also developing their digital skills to be able to meet the needs of businesses expanding in our city.

Children and young people are key to the future of the city, and we want Coventry to be a place where every child can thrive and has the opportunity to fulfil their potential.

# One Coventry Plan

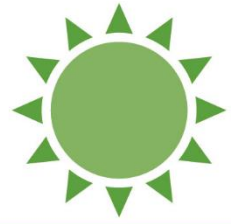
## 2022 - 2030



**Increasing the economic prosperity of the city and region**



**Improving outcomes and tackling inequalities within our communities**



**Tackling the causes and consequences of climate change**



**Continued financial sustainability of the Council**



**Council's role as a partner, enabler and leader**



## Vision

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

We will create:

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

We will do this by being:

- a council with a strong and sustainable financial position, with resources and assets that are aligned with our priorities.
- a council that plays a key role as a civic leader, working in genuine partnership with local residents, communities and partners.

## Approach

One Coventry describes how we work and collaborate with our partners and our communities to ensure that our residents get the very best that the city can offer and the approach that we will take as individuals, teams and services across the Council.

It includes the Council's priorities and enablers, our values, new ways of working, and core areas of focus to deliver the One Coventry Council Plan objectives, key strategies, and approaches.

It focuses on enabling people to live their best lives in a vibrant and prosperous city. This can only be achieved by listening to, and collaborating with, those who live, work, visit and do business in our city, by having different conversations and building on the great things that are already happening.

This Plan sets out how we will deliver these priorities and outlines our key enablers, our measures of success and the role that residents and partners will have in delivery.

# Priorities

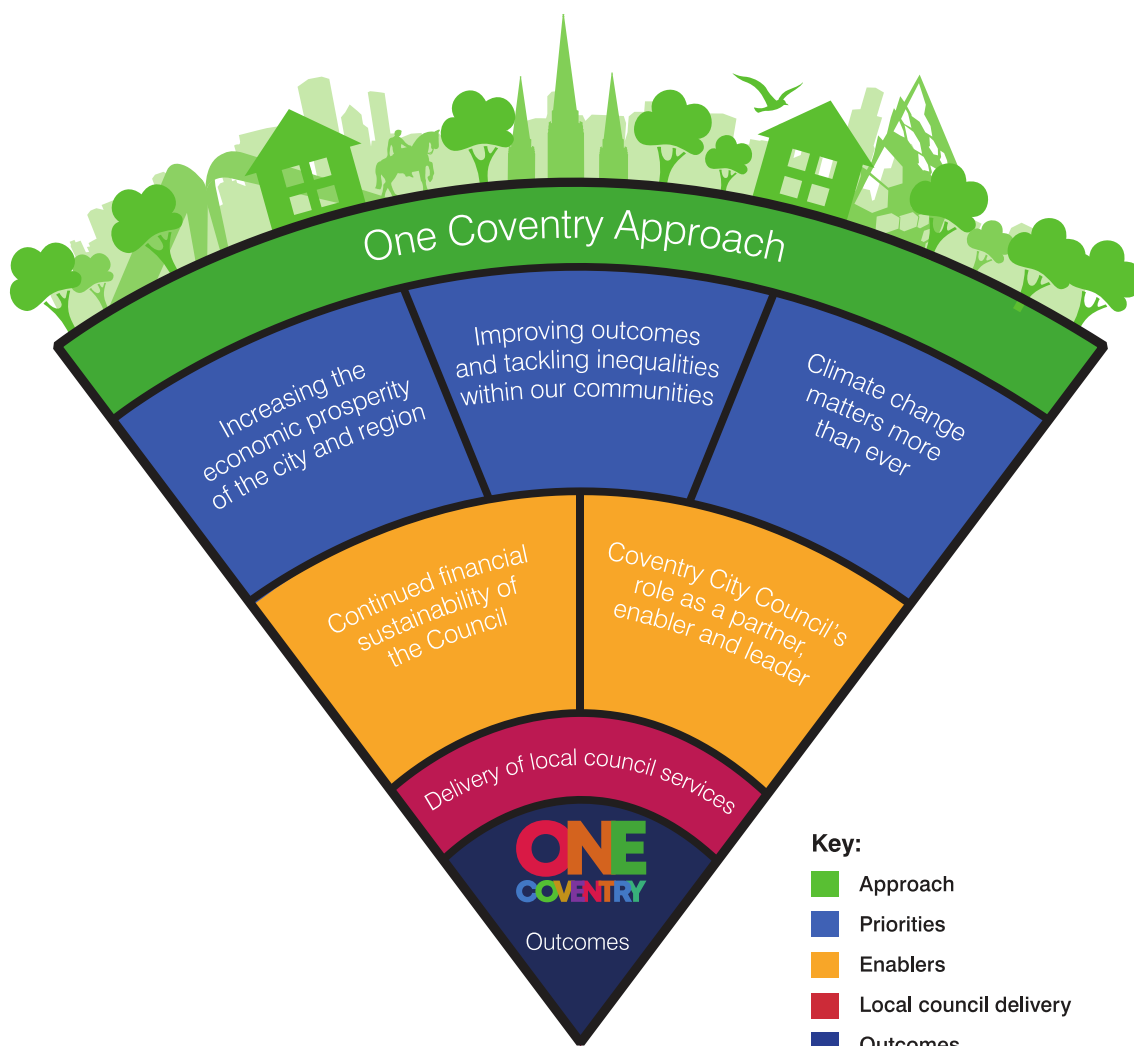
Building on key Council and partnership strategies, our One Coventry Plan sets out three interconnected priorities:

- Increasing the economic prosperity of the city and region
- Improving outcomes and tackling inequalities within our communities
- Tackling the causes and consequences of climate change

# Enablers

Underpinning and essential to the delivery of our priorities are two key enablers:

- Continued financial sustainability of the Council
- Council’s role as a partner, enabler and leader





# Increasing the **economic** **prosperity** of the **city** and **region**





## Increasing the economic prosperity of the city and region

Developing and building on the strength of our city's economy to deliver inclusive growth, supporting businesses to innovate, grow and scale up. Capitalising on the green technological revolution to create more local jobs.

### We will do this by:

Working with the existing businesses in the city to grow and expand, creating new jobs and becoming more resilient to fluctuations in the economy.

Working to secure new inward investment in the city, businesses looking to grow and expand in the UK. Marketing Coventry as an attractive place to invest and create new jobs.

Actively supporting residents through tailored programmes and initiatives to improve their skills (targeting skills as required) and secure better jobs and help people out of work into work.

Working with the education system to ensure an understanding of the future job market and implement appropriate pathways to employment for adults with mental ill health, disabilities, carers and new migrants to the city, young people from diverse backgrounds and all young people aged 14+.

Working with businesses investing in new technologies and innovations across the city, providing public investment, knowledge, and expertise.

Working with our businesses and communities to deliver a strong and tangible legacy of opportunity from UK City of Culture 2021 and the Commonwealth Games 2022.

When delivering projects across the city we will, where possible, prioritise jobs and skills for local people, use local small businesses and source materials as

locally as possible to try to ensure inward investment into the local area.

We will create a sustainable, inclusive transport infrastructure, attracting businesses to invest. This will focus on a substantially improved public transport network, an environment that is much more suited to walking and cycling and harnessing transport links at the forefront of innovation.

Continuing to improve the city and develop projects that enable local neighbourhoods to play their part in our economic success.

Working with partners to ensure the continued provision of high-quality affordable housing throughout the city.

Working with registered providers, charities, and community organisations to deliver more social housing for those who need it most. We will explore options around community-led housing projects, putting meaningful community involvement at the heart of new housing development.

We will continue to ensure our city centre remains clean and tidy and offers a diverse range of experiences for residents and visitors to enjoy. By ensuring a high standard of city centre we will continue to attract investment and development making the city a liveable, green and safe place to thrive.

Including Social Value qualitative criteria in its tender activity to capture social value commitments specifically offered in relation to the city of Coventry and the tender opportunity advertised. The commitments sought through tender activity will align to the Council's [Social Value & Sustainability Policy](#), including but not limited to; number of apprenticeships offered, increased diversity of employees, working with SMEs, and reduction of carbon footprint.

We want our residents and communities to help us deliver this plan by:

- Taking up training opportunities available to develop skills
- Participating in job opportunities and projects to play a part in the economic success of the city
- Support local businesses by buying locally

If we are successful, the difference you can expect to see is:

- Sustainable, growing and prosperous economy
- Vibrant city centre with increasing visitors
- People accessing training opportunities and getting into and remaining in employment
- More education and training opportunities available for young people aged 16+
- Levels of poverty and deprivation in the city decreasing
- More housing in the city
- Increased investment in the city, attracting more new businesses



# Improving outcomes and **tackling** **inequalities** within our **communities**



## Improving outcomes and tackling inequalities within our communities

Focusing on improving outcomes for local people and tackling inequalities in order to build prosperity across the city, protecting the most vulnerable and supporting and valuing the contribution of our residents.

### We will do this by:

Effectively delivering the essential services that matter most to our communities.

Strengthening our Marmot City approach to ensure it remains at the heart of what we do.

Working with NHS partners to encourage healthy lifestyles and provide quality healthcare to all communities across the city.

Working with business, residents, partners, and education providers to ensure that all our communities' benefit from job opportunities created by investment in the city.

Tackling inequalities through a collaborative approach, with our residents, communities, and partner organisations and through alignment with our Health and Wellbeing Strategy.

Tackling violence and abuse in all forms, including sexual assault and abuse, serious violence and domestic abuse.

Addressing the needs of those on low incomes with affordable access to quality housing, heating, and insulation.

Protecting children and supporting families to give children the best start in life. Raising their aspirations through integrated early help, education partnership work and implementing the Family Valued programme.

Improving the educational attainment of our children and young people, aspiring

excellence within all academic institutions to ensure all our children and young people are in good or outstanding schools and settings.

Continue to narrow and close the gap in education performance measures for vulnerable groups at each phase, including supporting children and young people who were most affected by disruption to their learning due to the pandemic.

Increasing Special Educational Needs and Disability places in the city.

Improving social, emotional, and mental health and well-being of our residents by enabling people to live independently where possible.

Supporting our most vulnerable – including people who are street homeless, experiencing mental ill health and the integration of our refugee and migrant communities.

We want our residents and communities to help us deliver this plan by:

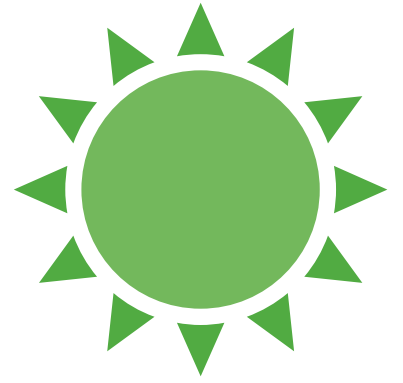
- Engaging in opportunities to improve your health and wellbeing
- Supporting their children to get the best out of their education. Discuss their aspirations and tell us how we can help to make it happen
- Using the local, free, early years and childcare offer
- Accessing skills and training opportunities which can broaden employability and further aspirations

If we are successful, the difference you can expect to see is:

- A reduction in inequalities, including health inequalities, between our most deprived and most affluent wards
- More residents in employment, education, or training, including school

leavers, and people facing significant disadvantages

- Improvement in life expectancy, healthy life expectancy, and wellbeing
- Reduction in crime and violence including domestic abuse and sexual violence, drug and alcohol, youth justice
- Adults with care and support needs supported to gain, or regain, as much independence as possible
- Social care will have a positive impact on the quality of life for Adults with care and support needs and their carers
- Children and young people will be protected, enjoy the best start in life, and have good health, and emotional wellbeing
- Improvements in educational achievement and progress to destinations of choice of our children and young people
- A reduction in people who are homeless
- Better integrated communities
- Cleaner streets with a reduction in fly tipping



# Tackling the causes and consequences of climate change



# Tackling the causes and consequences of climate change

Having a relentless focus on tackling the causes of climate change and mitigating the inevitable consequences of this, to ensure the well-being of our residents and position Coventry as a leader and pioneer of the green industrial revolution.

## We will do this by:

Establishing an independent Coventry Climate Change Board to address the major challenges of climate change, development of a circular economy and loss of biodiversity by adopting the International Council for Local Environmental Initiatives (I.C.L.E.I.)

5 Development Pathways:

### 1. Low Emission Development

Investing in the development of technology solutions with businesses, universities, and partners to increase the adoption of new efficient, zero carbon renewable energy generation technologies. Promoting and supporting inward investment of zero carbon technologies in making the city a global market leader in a clean and green transport e.g., Very Light Rail and encouraging residents, communities, and businesses to take up active and green forms of travel.

Encouraging green behaviours from everyone that lives, works or visits the city, and working with schools to implement sustainability into the curriculum in a holistic way.

### 2. Nature-based Development

Promote biodiversity and the natural heritage and greenspace across the city. Protecting and developing existing and new biodiversity and habitats for current and future generations.

Ensuring that we protect wildlife, communicate awareness and engage

communities and developers on the conservation of natural habitats.

### 3. Equitable & People Centred Development

Address inequalities exacerbated by the effects of climate change such as unemployment, fuel and food poverty, air quality and access to open space with associated impacts on health & wellbeing.

### 4. Resilient Development

Address the impacts and consequences of Climate Change by ensuring we have the right infrastructure in place to cope with the effects of extreme weather events such as flooding and extreme heat.

### 5. Circular Economic Development

Actively support businesses, schools, and partners in the minimisation of waste and the development of a circular economy which moves away from the traditional business model of consumption production and disposal to extending the life of products, re-use, and recycling.

We want our residents and communities to help us deliver this plan by:

- Being aware of personal carbon footprint and consider energy efficiency options to reduce this
- Reusing and recycling more
- Taking pride in our city by not dropping litter, fly tipping or posting and cleaning up after your dog
- Using greener travel options - walking, cycling, public transport, car sharing and low emission vehicles

If we are successful, the difference you can expect to see is:

- Improved air quality
- Lower carbon emissions

- Increased use of zero carbon transport, active travel, and public transport
- Increase in the numbers employed and the commercial success of businesses which seize the opportunities climate change presents
- Improvements in energy efficiency and use of zero carbon technologies
- Increased biodiversity and areas of natural vegetation and open space
- Reduced incidence of floods and levels of flood damage as a consequence of climatic effects
- Improved health and wellbeing for the population and a reduction in the health inequalities
- Reductions in the levels of waste and greater levels of re-use and recycling





# Continued financial sustainability of the Council



## Continued financial sustainability of the Council

Ensuring the Council's financial resources are aligned with key priorities in a way that enables us to maintain a strong and sustainable financial position.

### We will do this by:

Balancing future budgets and identifying financial plans that can meet the needs of residents and communities and manage the cost of services that have a high financial risk.

Managing new expenditure pressures by challenging traditional service delivery methods in the first instance.

Pursuing a balanced portfolio of commercial activities and financial support to external programmes that are aligned to our priorities.

Maximising external funding opportunities, including capital investment and collection of income.

Implementing a prioritised programme of change to enhance our digital offer.

Establishing an engaged, inclusive workforce in collaboration with our employees. To be an employer of choice that is diverse, reflective of our communities, that together works with partners to improve working lives and experience.

Retaining and developing talented staff with effective succession planning including development of an agile, flexible, and responsive workforce that is representative of our local communities, to meet service needs.

Focus on ways that involve teams working collaboratively across service boundaries and optimising a whole Council approach.

We want our residents and communities to help us deliver this plan by:

- Accessing services digitally where possible

If we are successful, the difference you can expect to see is:

- A Balanced budget, minimising the level of service savings and reserve contributions required
- Growth in commercial income
- An engaged workforce that is representative of our communities



# Council's role as a **partner,** **enabler** and **leader**



## Council's role as a partner, enabler and leader

Ensure the Council plays a key role as a civic leader. Recognise that our relationships with local residents, communities, and partners (public, private, and voluntary sectors, schools, colleges and universities) and as an employer have never been more critical.

### We will do this by:

Playing a leading role in responding to national and regional policy for local government, leading on innovative approaches to working differently and offering opportunities for others to learn from the work that we do.

We will take the time to engage and listen to residents, business, communities and partners to ensure, we approach issues and opportunities in a One Coventry way. We will demonstrate our values in every interaction we make with people.

Acting as a system leader across the children's system to galvanise partners to enable better integrated outcomes for children. Particularly with Health Partners, the education partnership, and the Police.

Working with residents and communities, listening to their ideas, and coming together to find solutions to challenges faced, making a positive difference to their lives and environment, such as cleaner and liveable neighbourhoods.

Leading and co-ordinating Coventry's response on how the city tackles challenges and opportunities associated with climate change and the necessary transition to a zero-carbon economy and benefitting from ongoing public investment.

Leading the delivery of aspirational investments through regional partnerships including the Gigafactory in Coventry and the investment and diversification of

the Automotive and advanced manufacturing supply chain to move towards the requirements of an electrified industry.

Working with partner organisations to improve the quality of the lives of local residents, enabling them to live in the community wherever possible by investing in community support and building community capacity. Improving services through listening to our residents and partners, investing in digital provision and making the most effective use of collective resource through integration.

Driving inclusive growth and support healthier, better connected and more prosperous communities.

Ensuring Coventry delivers a lasting legacy from the opportunities as UK City of Culture 2021 and host city for the Commonwealth Games 2022.

Enabling residents to grow their resilience and capacity, so local people can determine solutions that best support the lives they want to live. Ensuring residents are able to access the right support, in the right place, at the right time, and are well placed, equipped, and able to access the opportunities of the future.

Being a lead partner and applicant for new public funding opportunities to support business investment, skills development, and employment support.

Working with partners to increase access to a range of online and community-based activities for children and young people within the city.

We want our residents and communities to help us deliver this plan by:

- Engaging with the Council and partners on key issues and work collaboratively, using city-wide resources to overcome them

- Taking responsibility for your area by working closely with others in your communities to resolve local issues
- Telling us if anything in your area is concerning you

If we are successful, the difference you can expect to see is:

- Strong and effective partnerships that enable successful delivery of our One Coventry Plan priorities:
  - increasing the economic prosperity of the city and region;

- improving outcomes and tackling inequalities within our communities;
- tackling the causes and consequences of climate change
- Regional and national recognition of the city, and its approach to partnership working

# Our values

Our One Coventry Values are at the heart of our approach to delivery, defining us as an organisation, and underpinning how we will work with others.



## Delivery requirements

Our priorities are ambitious and challenging in equal measure, but we believe that our One Coventry approach puts us in a strong position to deliver; if we are focused, committed and work together to make a difference. This will require radical change for resources to be redirected in order for progress to be made. We will also seek to share resources and support with our communities and partners – taking a One Coventry approach.

## Our workforce

Our workforce is essential to the delivery of our priorities. As an agile workforce (flexible working offer for our workforce), we are better able to respond to needs of residents while providing a better work/life balance for our people. Combined with delivering our Workforce Engagement Plan to support a motivated and engaged workforce, our Workforce Diversity & Inclusion Strategy will ensure a diverse and inclusive organisation representative of the community it serves.

## Our commitment to equality, diversity, and inclusion

Coventry City Council is committed to making a difference to the lives of the people of Coventry by improving equality of access to our services; of inclusion and respect for people from different backgrounds, challenging inequality, harassment, discrimination and racism; ensuring that our employment opportunities are fair and transparent, in order for our workforce to be more representative of our city. The Council's approach to diversity & inclusion is to focus on the things that really make a difference to people's lives by ensuring that equality is embedded in the One Coventry Plan objectives.

We will continue to ensure that the Council meets its obligations under the Public Sector Equality Duty, building on our successes at fostering good relations between Coventry's communities of identity and striving to achieve fair and equal access to Council functions. Through ongoing customer monitoring, satisfaction, and engagement approaches, we will strengthen and utilise our growing evidence bases at both Corporate and service levels to identify the differential experiences of individual groups in

Coventry accessing Council services, and proactively respond to make these as fair and equitable as possible.

We will strengthen the methodology and governance around our approach to undertaking Equality Impact Assessments (EIAs), ensuring that all Council functions are engaging with, and assessing the impact of their services for Coventry's communities as appropriate, as well as considering any potential health inequalities on these communities.

We will also continue to monitor progress against the Council's equality objectives; these are the identified equality priorities for the Council and the areas which we believe will help deliver improvements on policy-making, service delivery and employment.

## Communication, engagement and collaboration

We recognise the importance of communication, engagement and collaboration with residents and communities, putting resident and community voice at the heart of everything we do. We are committed to working together with organisations in Coventry, listening to and working more closely with communities to identify and respond to the challenges faced by the city. Striving to ensure communities are not only well informed about the work we are doing but have an opportunity to influence and be part of what we do.

## Using insight and evidence

We will use insight from the information and data that we collect to understand the needs of our city and its residents. We will

use this as evidence to inform decision-making; drive conversations with communities and to ensure that we target Council resources in a way that ensures we are in the best possible position to improve outcomes for local residents and deliver our priorities.

## Policy and partnership working

The Council is committed to playing a leading role in responding to national and regional policy for local government. We also recognise our own role in local policy setting, leading on innovative approaches to working differently, testing new ideas and offering opportunities for others to learn from the work that we do. The role of local government has changed significantly over recent years and we must be a part of that change, taking every opportunity to learn, develop and improve.

Coventry has a strong history of partnership working, and the Council plays a key role in promoting collaboration across public, private, and voluntary and community sectors in the city. At a time when resources are scarce, it is even more important that organisations work more collaboratively and that our efforts are focused on the right things. Working more seamlessly across organisational boundaries and delivering services differently that are designed with residents is at the heart of our ambitions. We will continue to use our convening capacity to improve the quality of the lives of residents, working with partners and communities to build capacity and making the most effective use of city-wide resources.

## Measuring success

We will track delivery of our priorities and identify opportunities for improvement to ensure that we deliver the Council's vision for the city. We will continue to monitor Council performance against a

comprehensive set of performance indicators and publish our findings. Further details on our performance can be found at:

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

The delivery of the One Coventry Council Plan is supported by a range of policies and strategies, each with its own delivery plan. Further details on our key policy and strategy documents can be found at:

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

Progress against key programmes of work included in this plan will be reported on an annual basis. The plan will be subject to an annual review process. The process is set out in our Performance Management Framework at <https://smarturl.it/pmf>





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# Summary of engagement feedback on the One Coventry Plan February 2023



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## 1) Background

Extensive engagement was conducted to enable as many people as possible to share views about Coventry and how we deliver our priorities for the future together. A variety of methods were used to engage as many people as possible.

This report provides a high-level summary of the feedback received.

A summary of engagement activity is shown below:



## 2) Survey Overview

In total, 845 surveys were completed. This included:

- 795 surveys via Let's Talk Coventry
- 20 short surveys (condensed version of Let's Talk survey)
- 30 surveys completed at Migration Team events

The surveys posed similar questions but each survey type included questions phrased slightly differently depending on the audience. Where available, a summary of the respondent data collected across the surveys is included within this report.

All survey questions were optional, response numbers differ for each question depending on how many respondents chose to skip questions.

The main survey was hosted on Let's Talk Coventry (engagement platform), as well as hard copies being available at Family Hubs and libraries across the city, to capture views on the draft One Coventry Plan and its priorities. The survey was widely promoted via the Council's social media, contact lists and newsletters. A phone number was provided to enable people to request the survey in different formats.

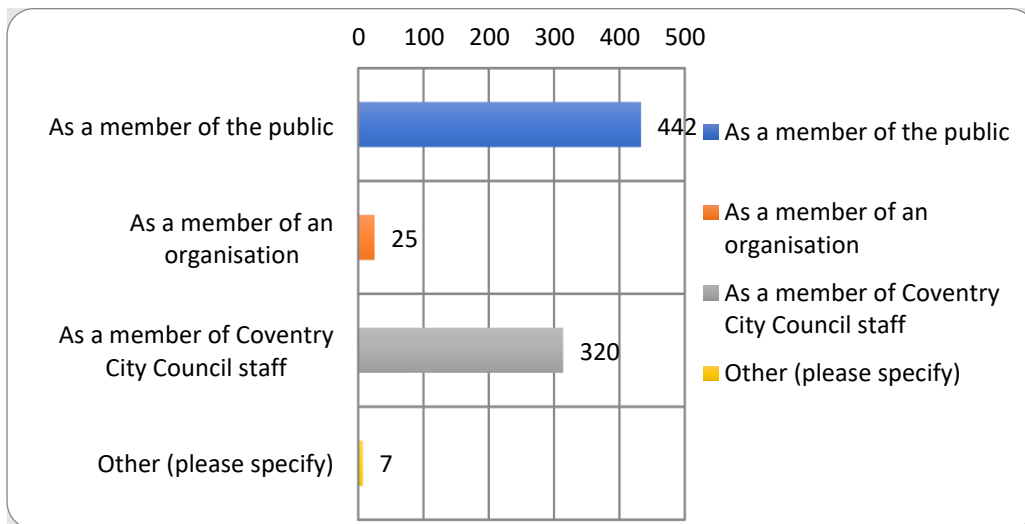
The main survey (available via Let's Talk Coventry) was open from 28<sup>th</sup> February 2022 for employees and from 13<sup>th</sup> June 2022 for wider external engagement. The engagement period ended on 30<sup>th</sup> September 2022.

All paper copy survey responses received were inputted manually onto Let's Talk Coventry.

### 3) Respondent Profile

The graph below is made up of the findings from the Let's Talk Survey and the short survey. The migration survey did not ask these questions.

Over half of the responses (56%) were received from local residents, followed by 40% from Council employees. A further 3% of responses were received from representatives of local organisations.



16 people did not answer this question (not shown in graph).

A small number of respondents (1%) selected 'Other' and some of the ways they chose to identify themselves include:

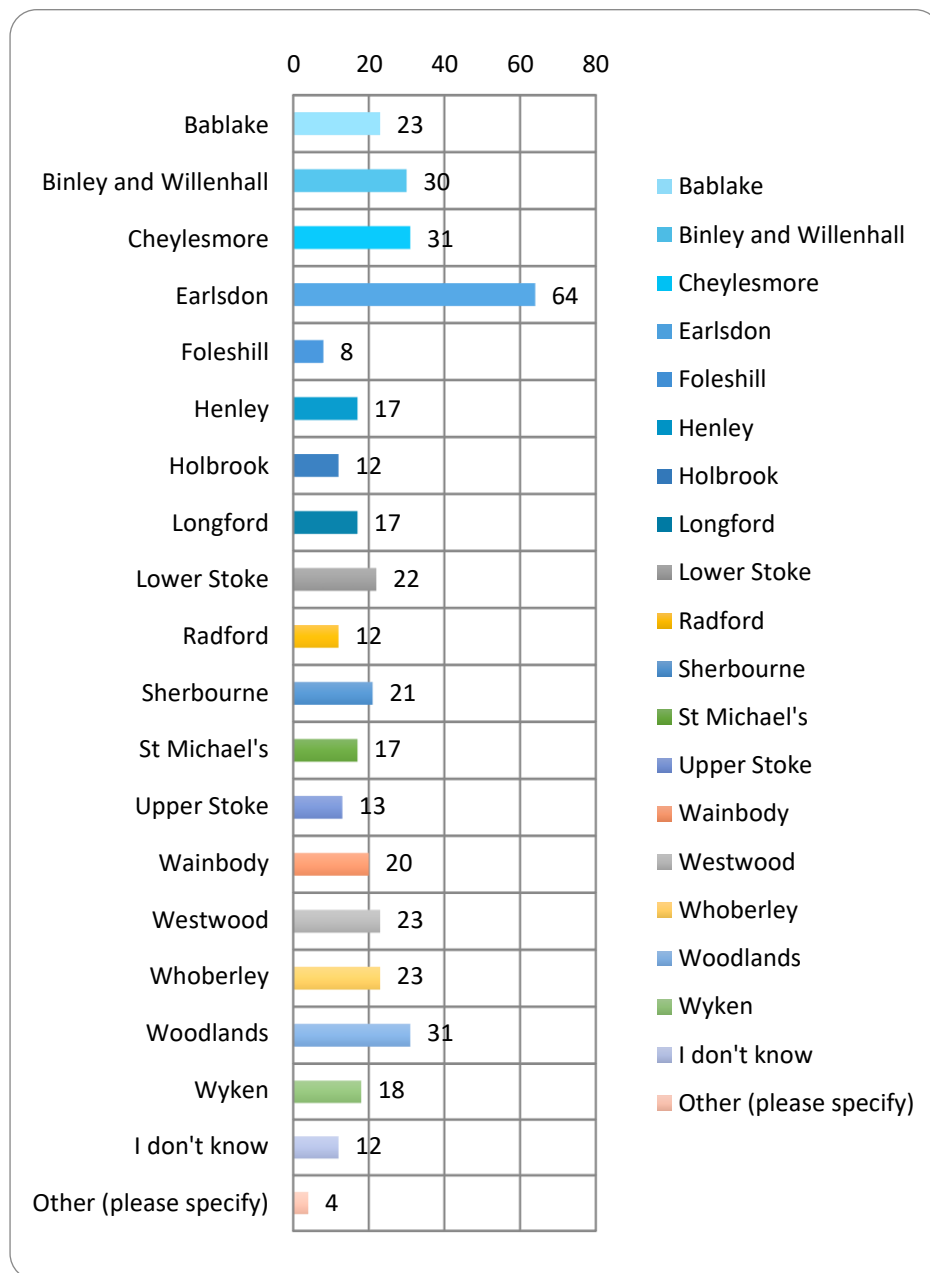
- A member of the public and as a member of staff
- A long serving community pharmacist
- A business owner in Coventry
- A resident and parkrun ambassador for the local area

#### 4) Location of respondent

The graph below is made up of the findings from the Let's Talk Survey and the short survey. The migration survey did not ask these questions.

Respondents were asked to state which Ward they lived in if they were responding as a local resident. This question was added after the survey had opened therefore the number of respondents answering this question is lower than the number of responses received.

This question was added to help identify our engagement reach across the city.



Other responses included “living outside of the city but working in Coventry” and a comment that “this should be anonymous for anyone not wanting to specify details”.



## 5) Priorities (how respondents ranked our priorities)

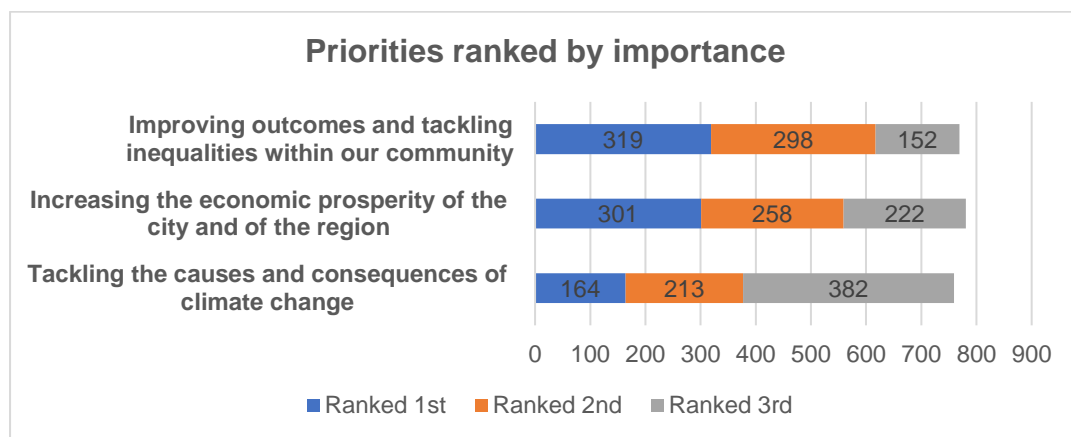
This section provides an overview of responses to questions asked only in the Let's Talk Coventry survey. The short survey and the migrant survey did not ask this question.

Respondents were asked to rank our three priorities in order of importance to them.

Improving outcomes and tackling inequalities within our communities' priority received the highest number of first place rankings and also second placed rankings, making it the priority viewed as the most important for the majority of respondents.

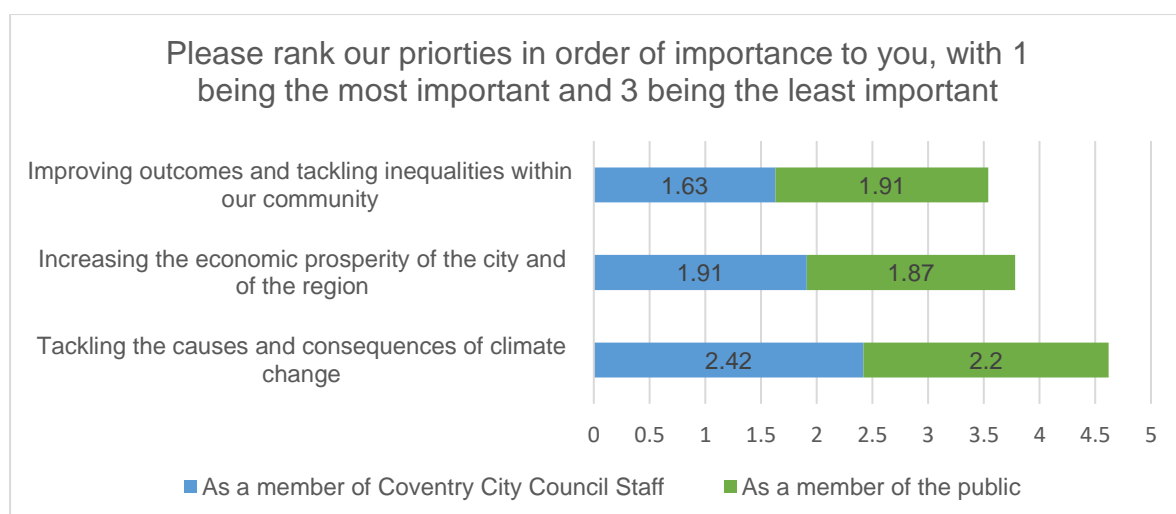
Increasing the economic prosperity of the city and of the region priority received second placed ranking overall, with tackling the causes and consequences of climate change priority being the third placed priority.

Numbers of responses differ because some respondents did not rank all three of the priorities.



If we compare the responses from residents with those from employees there is a different order of priority with residents viewing the increasing the economic prosperity of the city and of the region priority as the most important priority.

The lower the number the most important the priority is felt to be.



## 6) Common themes identified for each priority

This section includes a summary of the common themes, primarily informed by all surveys but also supported by all other engagement feedback, for each of the five priorities.

### Priority: Improving the economic prosperity of the city and region

**One Coventry Plan Engagement**

Increasing the economic prosperity of the city and region

The things you said are most important

- Transport and road infrastructure
- Communication, engagement and collaboration
- Jobs and employment
- Business investment and planning
- Cultural activities
- Affordable business rates and rents
- Housing and homelessness
- Support our most vulnerable
- Environment
- City Centre

Coventry City Council

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The infographic features a dark blue background with a colorful border at the top and bottom. It contains a grid of ten icons, each representing a theme. The icons are: a red car, an orange megaphone, a green magnifying glass over a person, a blue building, purple fireworks, a yellow sign with 'RENT', a red house, an orange hand with a heart, a green wind turbine, and a blue silhouette of a person on a horse. The Coventry City Council logo is in the bottom left, and the 'ONE COVENTRY' logo is in the bottom right.

**Priority: Improving Outcomes and Tackling Inequalities within our Communities**

# One Coventry Plan Engagement

Improving outcomes and tackling inequalities within our communities



## The things you said are most important

 <p>Communication, engagement and collaboration</p>	 <p>Education training and youth provision</p>	 <p>Access to services and support</p>	 <p>Housing and homelessness</p>
 <p>Environment</p>	 <p>Jobs and employment</p>	 <p>Inclusion and diversity</p>	 <p>Health</p>
 <p>Coventry City Council</p>	 <p>Reducing inequalities in our communities</p>	 <p>Crime and safety</p>	

# One Coventry Plan Engagement

Tackling the causes and consequences of climate change



## The things you said are most important

 <p>Collaboration and partnerships</p>	 <p>Education training and youth provision</p>	 <p>More nature and greenery</p>	 <p>Greener workplace</p>
 <p>Incentives for green behaviours</p>	 <p>Energy-efficient buildings</p>	 <p>Transport and commuting</p>	 <p>Improving infrastructure</p>
 <p>Coventry City Council</p>	 <p>Investing in renewable energy</p>	 <p>Recycling and litter</p>	

# One Coventry Plan Engagement

## Continued financial sustainability of the Council




### The things you said are most important

 <p><b>Innovation and investment in the city</b></p>	 <p><b>Digital and innovation</b></p>	 <p><b>Promote the city more</b></p>	 <p><b>Communication, engagement and collaboration</b></p>
 <p><b>Business support and regeneration</b></p>	 <p><b>Thinking long term while acting now</b></p>	 <p><b>Efficient workforce</b></p>	 <p><b>Best use of buildings</b></p>
 <p><b>Use money well</b></p>			



# One Coventry Plan Engagement

Council's role as a partner, enabler and leader




## The things you said are most important

- 

Communication, engagement and collaboration
- 

The right support for communities
- 


Wider investment in the city
- 

Lead by example
- 

Better use of data
- 

Accessible information
- 

Inequalities



## 7) Residents and Partner Workshops

Workshops were hosted and both residents and partners were encouraged to attend. Workshops were available both online and face to face, with sessions during the day and in the evening. The workshops were widely promoted through social media and through existing partner networks.

This summary includes feedback from:

- 6 residents & partner workshops
- Youth Council workshop
- Parish Council workshop

All of the feedback from the workshops was considered and this identified common themes, as shown below:

**Residents and Partner Workshops**  
The things you said are most important

- Communication, engagement and collaboration
- Innovation and investment in the city
- Climate change and environment
- Education, training and youth provision
- Reducing inequalities in our communities
- Housing and homelessness
- Transport and commuting
- Access to services and support
- Promote the city more
- Better use of data

Coventry City Council

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## 8) Informal engagement

Informal engagement was conducted in communities, at events and in the City Centre. To remove barriers and encourage as many people as possible to engage with us we posed a simple question “What would the Coventry of 2030 look and feel like to you?”

Over 740 people shared their views as part of this engagement activity.

All of the feedback from informal engagement was considered and this identified common themes, as shown below:

**One Coventry Plan Engagement**  
**Coventry in 2030**

The things you said are most important

- Transport and commuting
- Cultural activities
- Climate change and environment
- City Centre
- Activities for young people
- Innovation and investment in the city
- Inclusion and diversity
- Communication, engagement and collaboration
- Promote the city more
- Access to services

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## 9) Next Steps

All engagement feedback has been reviewed and is being shared across Council services and with partners. This will inform service delivery now and strategic planning for the future. The feedback has informed development of the One Coventry Plan and plays a vital role in defining how we deliver our priorities going forward.

More detailed feedback reports from One Coventry Plan engagement are available on our website – [www.coventry.gov.uk/OCPFeedbackReports](http://www.coventry.gov.uk/OCPFeedbackReports)

To find out more about how we are responding to your views, see the Cabinet Report for the One Coventry Plan 2022-2030.

Further updates on how we continue to respond to what you have said is important to you and how we are delivering our priorities will be shared on Let's Talk Coventry and the Council's website.





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

Cabinet  
Council

14 March 2023  
21 March 2023

**Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor D Welsh

**Director approving submission of the report:**

Director of Business, Investment and Culture

**Ward(s) affected:**

St. Michaels

**Title:**

City Centre Cultural Gateway Project

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**Is this a key decision?**

Yes - the proposals involve financial implications in excess of £1m per annum.

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**Executive summary:**

This report is seeking approval for the main construction works for the City Centre Cultural Gateway, which includes the creation of a Collections Centre for nationally significant cultural, arts and historical artefacts, in collaboration with the Partners - Arts Council England (ACE), British Council (BC) and Culture Coventry Trust (CCT); along with the development of a newly Cultural Hub by Coventry University.

On 23rd February 2021, Council approved the acquisition of the former IKEA building to facilitate the development of the proposed Collection Centre, along with additional professional design fees to develop the designs through to RIBA Stage 4 (contractor procurement), subject also to finalising the commitment of the Partners (through a Partnership Agreement) to the underwriting of these fees should the project not proceed.

Currently, the designs for both the Collection Centre and the Cultural Hub are progressing through the RIBA Stage 4 – Detailed Design, towards the final phase of this stage whereby the construction works are tendered for contract.

## **Recommendations:**

Cabinet is recommended to request that Council:

- 1) Approve capital expenditure of a sum specified in the Private Report to be financed from prudential borrowing to fund the construction and professional fees for the Collection Centre development within the City Centre Cultural Gateway Project
- 2) Approve capital expenditure of a sum specified in the Private Report to be financed from prudential borrowing to fund the construction and professional fees for the Cultural Hub (Coventry University) development within the City Centre Cultural Gateway Project
- 3) Approve capital expenditure of a sum specified in the Private Report to be financed from prudential borrowing to fund the construction and professional fees for the Future Proofing – enclosure, shell and core works to Floors 1 and 2.
- 4) Delegate authority to the Director of Business, Investment and Culture and Interim Chief Executive (Section 151 Officer), following consultation with the Cabinet Member for Housing and Communities, to undertake the necessary due diligence and finalise terms of Agreements for Lease between Coventry City Council and Arts Council England, British Council and Culture Coventry in respect of the Collection Centre development.
- 5) Delegate authority to the Director of Business, Investment and Culture and Interim Chief Executive (Section 151 Officer), following consultation with the Cabinet Member for Housing and Communities, to undertake the necessary due diligence and finalise terms of an Agreement for Lease between Coventry City Council and Coventry University in respect of the Cultural Hub development.
- 6) Authorise the commencement of all necessary procurement for works or services necessary to bring into effect the recommendations set out in 1) to 3) above.
- 7) Delegate authority to the Director of Business, Investment and Culture and Interim Chief Executive (Section 151 Officer), following consultation with the Chief Legal Officer, following the conclusion of the procurement tender to award contracts due to the tight timescale involved.

Council is recommended to:

- 1) Approve capital expenditure of a sum specified in the Private Report to be financed from prudential borrowing to fund the construction and professional fees for the Collection Centre development within the City Centre Cultural Gateway Project.
- 2) Approve capital expenditure of a sum specified in the Private Report to be financed from prudential borrowing to fund the construction and professional fees for the Cultural Hub (Coventry University) development within the City Centre Cultural Gateway Project.
- 3) Approve capital expenditure of a sum specified in the Private Report to be financed from prudential borrowing to fund the construction and professional fees for the Future Proofing – enclosure, shell and core works to Floors 1 and 2.
- 4) Delegate authority to the Director of Business, Investment and Culture and Interim Chief Executive (Section 151 Officer), following consultation with the Cabinet Member for Housing and Communities, to undertake the necessary due diligence and finalise terms of Agreements for Lease between Coventry City Council and Arts Council England, British Council and Culture Coventry in respect of the Collection Centre development.

- 5) Delegate authority to the Director of Business, Investment and Culture and Interim Chief Executive (Section 151 Officer), following consultation with the Cabinet Member for Housing and Communities, to undertake the necessary due diligence and finalise terms of an Agreement for Lease between Coventry City Council and Coventry University in respect of the Cultural Hub development.
- 6) Authorise the commencement of all necessary procurement for works or services necessary to bring into effect the recommendations set out in 1) to 3) above.
- 7) Delegate authority to the Director of Business, Investment and Culture and Interim Chief Executive (Section 151 Officer), following consultation with the Chief Legal Officer, following the conclusion of the procurement tender to award contracts due to the tight timescale involved.

**List of Appendices included:**

None

**Background papers:**

None

**Other useful documents**

None

**Has it or will it be considered by scrutiny?**

No

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

No

**Will this report go to Council?**

Yes - 21 March 2023

**Report title:** City Centre Cultural Gateway Project

**1. Context (or background)**

- 1.1. On 4<sup>th</sup> February 2020, IKEA announced that it was proposing to close its Coventry store in mid-2020. However, the circumstances of COVID-19 that resulted in a national lockdown from 22<sup>nd</sup> March 2020, meant that the store effectively closed permanently from this date.
- 1.2. The announced closure of the IKEA store coincided with detailed discussions that were ongoing between Coventry City Council (CCC), Arts Council England, the British Council and Culture Coventry Trust (the Partners), in consultation with Coventry University, as to the feasibility of developing a partnership 'Collections Centre' of national significance, on an alternative city centre location in Coventry.
- 1.3. The collaboration between the City Council and the three Partner organisations therefore sought to identify and closely examine the opportunity to repurpose the existing landmark building of the former IKEA premises within the city centre, as opposed to creating a new purpose-built facility on an alternative city centre site.
- 1.4. On 23<sup>rd</sup> February 2021, Council approved the acquisition of the former IKEA building; along with a further approval for the capital expenditure in respect of the design works; and to enter into Agreements for Lease with the three Partners (Arts Council England; British Council; Culture Coventry Trust).
- 1.5. Since then, the project has changed its working title to become the "City Centre Cultural Gateway" and has identified three phases –
  - Phase 1 – Collections Centre
  - Phase 2 – Cultural Hub
  - Phase 3 – Future Proofing
- 1.6. *Phase 1* – working with the Partners, the Collections Centre phase involves the conversion of some specified Floors into bespoke facilities for the storage, care and management of nationally significant arts, cultural and heritage artefacts.
- 1.7. *Phase 2* – the Cultural Hub phase is proposed by Coventry University, to provide a range of cultural educational, engagement, training, and professional development opportunities.
- 1.8. *Phase 3* – the 'shell and core' works to the remaining Floors will facilitate future letting of these huge floor plates, by enclosing (shell) the floors; and providing essential (core) services to the floor for future service connection and distribution.

**2. Options considered and recommended proposal**

- 2.1. Option 1 – Development of Collections Centre; Cultural Hub; Future Proofing of Remaining Floors through Shell and Core Works (Recommended)

*Option Overview*

- 2.1.1 This recommended option involves the development of all three Phases of the project (as outlined above) simultaneously.

- 2.1.2 This would mean that the development of the Collections Centre; Cultural Hub; and the 'Shell and Core' conversion of the remaining Floors would be procured and funded as a single capital scheme.
- 2.1.3 This would in turn secure the tenancy of the two national Partners (Arts Council England and British Council) and Culture Coventry Trust for a period as specified in the Private section of this Report.
- 2.1.4 It would also secure the tenancy of Coventry University for a term as specified in the Private section of this Report.
- 2.1.5 It would secure the future suitability of letting the remaining Floors, through the enclosure (shell) of these floors along with provision of essential (core) services for the benefit of future tenancies.

#### *Current Status*

- 2.1.6 All three Phases of the project have currently been developed through RIBA Stage 3 (Developed) design.
- 2.1.7 Accordingly, all three Phases of the project have progressed into the RIBA Stage 4 (Technical) design process, which is the stage that carries the detailed designs into a formal set of Employer's Requirements for contract tender.
- 2.1.8 Following a process of public consultation and exhibitions, all three Phases have been submitted as a single Planning Application, including an overarching façade design that draws all the floors into a single and seamless façade appearance.
- 2.1.9 Work has commenced on securing consultancy support to test the options for the future use and letting of the remaining floors.

#### *Strategic Implications*

- 2.1.10 The approval of all three Phases underpins the context of the development becoming a 'cultural hub' for the city, securing partnerships with two national cultural organisations and strengthening the partnership with Coventry University through the development of a Cultural Hub for the city.
- 2.1.11 Attracting two national arts and cultural Partners will facilitate the growth and development of wider cultural partnerships in the city, thereby contributing to the city's Cultural Strategy.
- 2.1.12 Furthermore, the co-location of the national partners into a Collections Centre with Culture Coventry Trust will present a further opportunity to work collaboratively for exhibition content and curation at the Herbert Art Gallery and Museum.
- 2.1.13 The development of the Collections Centre will also ensure that Culture Coventry Trust's stored vehicle collection and its social history and archaeology collections can be relocated into bespoke, co-located storage accommodation.
- 2.1.14 Equally, the incorporation of a Cultural Hub will present further partnering opportunities, such that a Creative Directors forum has already been established between the creative leads for the Arts Council Collection, British Council, Culture Coventry, Coventry University and Coventry City Council, to explore existing and future synergies in creative ambitions.

- 2.1.15 The opportunity for the Collections Centre partnership to work alongside Coventry University's Cultural Hub will provide an environment that encourages shared professional learning and development of collections management, with curatorial and teaching staff co-located on site.
- 2.1.16 The shell and core of the remaining floors will facilitate the exploration of other cultural partnerships and uses to further strengthen the identity of a cultural hub.
- 2.1.17 Future letting of the remaining floors will provide significant opportunity to further activate the building.
- 2.1.18 The options appraisal for the remaining floors would also explore opportunities for growing community cultural partnerships to make it more accessible to a range of cultural organisations, who often find it challenging to secure creative and collaborative working spaces.
- 2.1.19 The delivery of all the phases of the City Centre Cultural Gateway into a cultural hub for the city will be an exemplar of city centre regeneration through the transformation of a former, large-scale abandoned retail space into a new, innovative and energised beacon of cultural activity as real legacy of the UK City of Culture 2021.

#### *Development Implications*

- 2.1.20 The Collections Centre designs and specifications are extremely specialised and bespoke to the demands and conditions of storing some of the nation's most valuable cultural, arts and heritage artefacts.
- 2.1.21 The works for the Cultural Hub involve major changes to the façade through the incorporation of significant glazing.
- 2.1.22 This additional glazing would bring inherent value to these floors, which will underpin the marketability of future lettings beyond the term of the Coventry University lease.
- 2.1.23 The shell and core conversion of the remaining floors at this stage is initiated by the fact that these floors cannot be used for car parking in the future.
- 2.1.24 Therefore, the basis of the recommendation is to have the intrusive works of enclosing and servicing these floors carried out within the main construction contract and prior to the occupation of the floors above by the Collections Centre partners.
- 2.1.25 Therefore, the professional team are currently working to determine the extent of intrusive works that could be carried out in the future (i.e. once the building has been tenanted).
- 2.1.26 The completion of these intrusive works to enclose these floors will secure the future letting and rental potential once the specific uses and tenants are known following some feasibility work.
- 2.1.27 The approval of all three Phases facilitates a single and seamless façade design for the outside of the building, to provide it with a new cultural identity, as a marked shift from its previous identity as an IKEA store.
- 2.1.28 The construction market is particularly volatile so that there is an inherent risk in tendering the construction contract within such a market.



- 2.1.29 Therefore, the Project Team are currently working with the Professional Team to assess the procurement options for tendering the scheme and how the cumulative value of delivering all three Phases might bring procurement benefit / advantage or procurement risk.
- 2.1.30 The approval of all three Phases would ensure that the RIBA Stage 4 (Technical) designs can be completed as a single piece of work and that there is more likelihood of meeting some demanding programme challenges, with the national Partners having timebound leases within their current locations.

#### *Legal and Financial Implications*

- 2.1.31 A capital grant for a sum as specified in the Private section of this Report contributed towards the acquisition of the building, with this grant being protected by way of a covenant that the building should be principally used for arts and cultural purposes.
- 2.1.32 Each of the three Phases of the project have separately costed capital expenditure requirements, which have then been modelled alongside business cases for recouping such investment through rentalisation and / or capital contributions.
- 2.1.33 The capital expenditure has been rentalised to the tenants over terms as specified in the Private section of this Report.

#### *Next Steps*

- 2.1.34 The RIBA Stage 4 designs will be taken through to the formulation of Employers Requirements to be tendered to the construction market through an agreed compliant procurement route.
- 2.1.35 A Planning Application has been submitted for the entirety of the scheme (i.e. all three Phases), so that Planning Consent should be obtained either prior to or during the tender period.
- 2.1.36 Contract tenders will be received and assessed against a quality and cost matrix to select a preferred contractor.
- 2.1.37 Agreements for Lease with each of the respective Partners and Coventry University will be finalised prior to the appointment of a Contractor.

#### 2.2. Option 2 – Do Nothing (Not Recommended)

##### *Option Overview*

- 2.2.1 This option is whereby CCC unilaterally decides to discontinue the project in its entirety, thereby abandoning the development of all three Phases of the project.

##### *Strategic Implications*

- 2.2.2 In relation to discontinuing the Collections Centre Phase, this would result in the Partners all having to find alternative locations for their collections storage, against the backdrop of existing leases that are already timebound.
- 2.2.3 This would result in the potential for considerable reputational risk and could affect the relationship between Coventry City Council and the two national Partners in the future.

- 2.2.4 The opportunity for growing and developing the partnerships with the national Partners would be compromised and opportunities within the city would be lost.
- 2.2.5 Culture Coventry Trust would need to find alternative accommodation for its vehicle storage and for its social history and archaeology collections.
- 2.2.6 In relation to the Coventry University Phase, there would also be reputational risk and the risk of damage to a crucial strategic partnership within the city.
- 2.2.7 The opportunity for the partnership between the Collections Centre Partners, Coventry University and Coventry City Council to have a meaningful and strategic impact within the city would be compromised, if not lost.

#### *Development Implications*

- 2.2.8 The City Council would need to quickly determine whether to seek alternative uses for the building or to dispose of the asset.
- 2.2.9 The Planning Application would need to be immediately withdrawn.

#### *Financial Implications*

- 2.2.10 Coventry City Council would not need to finance the development and delivery of all three Phases.
- 2.2.11 The expenditure incurred to date on professional fees would be irrecoverable under the terms of the Collaboration Agreement with Partners and Coventry University.
- 2.2.12 The capital grant towards the acquisition of the building would be at risk of clawback under circumstances where the building was not to be used for a cultural purpose or was to be disposed.
- 2.2.13 Coventry City Council would continue to incur holding costs (i.e. for the vacant building), but this risk would be substantially mitigated through the ownership of the asset.

### 2.3. Option 3 – Development of the Collections Centre Phase Only (Not Recommended)

#### *Option Overview*

- 2.3.1 This option would fund and continue to develop the Collections Centre Phase only and discontinue the Coventry University – Cultural Hub and Future Proofing Phases of the project.

#### *Strategic Implications*

- 2.3.2 In relation to the Coventry University Phase, there would be reputational risk and the risk of damage to a crucial strategic partnership within the city.
- 2.3.3 The opportunity for the wider partnership between the Collections Centre Partners, Coventry University and Coventry City Council to have a meaningful and strategic impact within the city would be compromised, if not lost.
- 2.3.4 A new use and tenant would need to be found to occupy these floors, with such a tenant needing to conform to the cultural use requirement as contained within the capital grant covenant.

2.3.5 The future uses of the remaining floors would most likely be substantially limited without the shell and core works being included within the design development and construction contract, as these works could compromise the integrity of the arts collections if they were to be undertaken once the Partners were in situ.

2.3.6 This could limit the ability to attract another cultural partner / use to these floors and therein impact upon an opportunity to further animate the building.

#### *Development Implications*

2.3.7 If any of the three Phases were not taken forward at this stage, then there would be a requirement to redesign the façade to incorporate those aspects that were not to be carried into the tender process and construction contract.

2.3.8 The floors intended for the development of the Cultural Hub would return to being a shell and core design until a new Partner were confirmed.

#### *Financial Implications*

2.3.9 Coventry City Council would not need to finance the development and delivery of Phases 2 and 3, being the development of the Coventry University – Cultural Hub; and the Future Proofing of the remaining floors.

2.3.10 Coventry City Council would not receive rental revenue from Coventry University to cover the capital and capital financing of Phase 2, along with some costs associated with Phase 1.

2.3.11 The expenditure incurred to date on professional fees for the Coventry University RIBA Stage 3 development would be irrecoverable.

2.3.12 The capital grant towards the acquisition of the building would be at risk of clawback under circumstances where the building was not to be principally used for a cultural purpose.

2.3.13 Coventry City Council would continue to incur a proportion of holding costs associated with servicing the remaining floors.

#### 2.4. Option 4 – Development of the Collections Centre and Coventry University - Cultural Hub Phases Only

##### *Option Overview*

2.4.1 This option would finance and continue to develop the Collections Centre and Coventry University – Cultural Hub Phases only and discontinue the Future Proofing Phases of the project.

##### *Strategic Implications*

2.4.2 The future uses of the remaining floors would most likely be substantially limited without the shell and core works being included within the design development and construction contract, as these works could compromise the integrity of the arts collections if they were to be undertaken once the Partners were in situ.

2.4.3 This could limit the ability to attract another cultural partner / use to these floors and therein impact upon an opportunity to further animate the building.

### *Development Implications*

2.4.4 If any of the three Phases were not taken forward at this stage, then there would be a requirement to redesign the façade to incorporate those aspects that were not to be carried into the tender process and construction contract.

### *Financial Implications*

2.4.5 Coventry City Council would not need to finance the development and delivery of Phases 3, being the Future Proofing of the remaining floors.

2.4.6 The future letting of these floors for rental income would be affected to the extent that the intrusive works of enclosing the floors and providing essential services to the floors could be limited by the impact upon the collections.

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

3.1 In 2017, Coventry City Council approved a 10-year Cultural Strategy (2017-2027), which was informed by structured primary research eliciting over 2,000 responses; involving over 12 hours of cultural strategy workshops; 20 hours of workshops linked to the city's bid for UK City of Culture; in-depth audience analysis; an audit of the existing cultural and heritage resources in the city; a tourism profiling study; and desk top research analysis.

3.2 The Coventry Cultural Strategy 2017-2027 identifies 'Seven Big Ideas' to bring life and substance to the Strategy's principles and goals. The fifth of these 'Big Ideas' is 'The Nation in Coventry', which recognises that "Coventry is well positioned as a showcase for the nation – with 40 million people within two hours travel time. The city will work to develop a plan to make Coventry a city of choice for national collections, events and productions".

3.3 A subsequent 'Cultural Capital Prioritisation Strategy' report in 2018 referenced the opportunity to improve the quality and accessibility of museum storage facilities in the city, noting the potential to relocate other local and national collections into aligned or stand-alone facilities.

3.4 Through Feasibility, Acquisition and Assurance stages of the project work, consultation on proposed shared Collections Centre facilities and the suitability of the former IKEA site for this purpose, has been undertaken with lead officers (and their architects and professional team advisors, where appointed) of Arts Council England, British Council and Culture Coventry.

3.5 A Public Exhibition Event was held on site on 21st February and 22nd February as part of the necessary Planning Consultation. The event on the 21st February, was an invitation-only event for those residents who live immediately adjacent to the site, whilst the event on the 22nd February was a wider public exhibition, which was publicised via the Let's Talk Coventry website, social media, local press and leaflet drop. The exhibition material was also available online.

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

4.1 Subject to Cabinet and Council approval, it is anticipated that the programme for the City Centre Cultural Gateway will be as follows:

- Stage 4 Design Completed – 13<sup>th</sup> June 2023
- Planning Submission – 6<sup>th</sup> March 2023

- Estimated Planning Decision – 31<sup>st</sup> May 2023
- Stage 4 Cost Report – 5<sup>th</sup> July 2023
- Tender Period Ends – 16<sup>th</sup> August 2023
- Tender review/AFLs/Approvals Completes – 1<sup>st</sup> November 2023
- Mobilisation on Site – 2<sup>nd</sup> November 2023
- Construction starts – 30<sup>th</sup> November 2023
- Construction completes – 29<sup>th</sup> November 2024

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

### 5.1 Financial Implications

#### *Capital cost and Affordability*

5.1.1 The anticipated total cost of the proposed scheme (to include all three Phases) includes the initial acquisition of the site, the design fees, and the cost of all construction works. External partners have requested that the City Council (as lead partner and owner) finance the redevelopment, backed by long lease/rent agreements to fund the borrowing costs.

5.1.2 A business case for each Phase has been modelled over a number years as specified in the Private section of this Report, with the overarching target being that proposals are cost neutral or better in revenue terms to the City Council.

#### *Phase 1 – Collection Centre*

5.1.3 This Phase includes the costs associated with the acquisition of the building (partially offset by grant funding, along with professional design fees, both of which were approved in February 2021. These costs do not therefore form part of the recommendations of this report.

5.1.4 The cost of borrowing has been calculated over a term as specified in the Private section of this Report, being the length of the leases to be entered into with each of the respective tenants. The assumed average rent represents the rentals to be paid by the tenants.

#### *Phase 2 - Coventry University Cultural Hub*

5.1.5 The total cost of Phase 2 including the cost of design and fees is to be financed with annual rental income from Coventry University funding repayments.

#### *Phase 3 – Future Proofing of remaining Floors*

5.1.6 These floors have not yet been let and therefore no rental income has been assumed at this stage.

#### *Business Rates and Running Costs*

5.1.7 Each tenant would be responsible for funding any of their respective any business rates liabilities. Similarly, tenants would also be responsible for meeting each of their respective liabilities for running costs and landlord service charges.

5.1.8 Coventry City Council would continue to be responsible for meeting rates and running cost liabilities for any void areas / floors.

## 5.2 Legal Implications

5.2.1 Section 1 of the Local Government Act 2003 gives the Council the power to borrow money for any purpose relevant to its functions under any enactment or for the purposes of the prudent management of its financial affairs.

5.2.2 In accordance with the Council's Contract Procedure Rules, all Contracts over £1 million on a per annum basis must be presented to Cabinet. As well as compliance with internal procurement rules set out in the Contract Procedure Rules, the Council must ensure compliance with procurement law where applicable.

5.2.3 The Council should also consider and build the following into procurement processes:

- Stakeholder engagement
- Efficient commissioning and sourcing arrangements
- Best value considerations, including social and environmental value, as well as economic
- Contract management

## 6. Other implications

6.1. The delivery of the proposal outlined in this report will help deliver a range of economic development and cultural legacy objectives that will help to realise the Council's strategic ambitions for a more vibrant and economically prosperous city.

6.2 The delivery of the City Centre Cultural Gateway project will directly contribute to Coventry Cultural Strategy objectives for capital; Partnership; Life-Long Learning and Economic Growth.

6.3 The recommended proposal will further contribute to the Council's core aims of:

- **Making the most of our assets and developing the city centre** – repurposing of a vacant city centre building as a new cultural asset for the city, increasing access to local and national arts, cultural and heritage collections; attracting inward investment; creating new jobs; attracting two national partners to locate key cultural services to the city for the long-term period of their leases. Initial, high-level economic modelling estimates that delivery of the City Centre Cultural Gateway project has the potential to support temporary construction jobs; jobs in arts, culture, tourism and hospitality related sectors; and generate circa £185m in Gross Value Added (GVA) for Coventry and the West Midlands over a 10-year period.
- **Improving educational outcomes** – the proposal offers the potential to develop new learning, education and training opportunities aligned to the City Centre Cultural Gateway Project and associated activities. Coventry has a strong cultural educational offer within the city, provided not only by schools and education services but also through both universities, colleges and arts businesses. The City Centre Cultural Gateway project will present the opportunity to widen access to key local and national collections and develop a centre of excellence in collections care, curation, management and associated disciplines. With the inclusion of Coventry University's Cultural Hub, there will be strong links to the national partners in the Collection Centre, which will also serve to strengthen the educational provision.
- **Raising the profile of Coventry through promoting Coventry as a visitor destination and centre for arts and culture** – Goal 5 (Economic Growth) of the Coventry Cultural Strategy identifies Coventry as a culturally vibrant, attractive and

prosperous city and sets the ambition that as a cultural city, we work to enrich the lives and environment for all residents. The Strategy aims to address the need of the city to improve the way it promotes itself as a major tourist destination for the West Midlands and as a result through a better articulated tourism offer, successfully attract more visitors, increase spend and secure and sustain new businesses and investment. The proposed project provides Coventry with a lasting physical and economic legacy from UK City of Culture 2021 and provides the opportunity to promote the city as a national centre of excellence for collections management, with an aligned exhibition programme offering the potential to promote the city to cultural audiences and academics

#### **6.4 How is risk being managed?**

- 6.4.1 The project is part of the Cultural Capital Investment Programme. The Programme comprised 15 cultural capital projects and is now managing two legacy projects and managing funds over £48m. The programme reports both to the Council's Capital Programme Board and the City Centre Cultural Gateway Board chaired by the Acting Chief Executive and Chief Operating Officer. The Programme operates under an Assurance Framework which was developed in conjunction with the City Council's legal team and sets out how the programme will operate, manage and monitor projects.
- 6.4.2 The project has a comprehensive risk register that covers the whole scheme, which is regularly reviewed by the Project Team and reported monthly to the City Centre Cultural Gateway Board.
- 6.4.3 Throughout the RIBA Stage 3 design stage of the project, a well-developed design has ensured that the ongoing detail of requirements is drawn from the various Partners and Coventry University as a future tenant. Accordingly, the RIBA Stage 3 Report has been approved and signed off by all of the respective parties as representing the design requirements.
- 6.4.4 The RIBA Stage 4 (Technical) Designs will provide further detail into the Employers Requirements for tender, so that there is more certainty around the capital cost being set against well-defined specifications.
- 6.4.5 The risk of capital expenditure requirements escalating as a result of economic factors is being mitigated through regular cost updates to understand the impact of construction indices; and work is ongoing to determine the preferred procurement route for the construction contract, which will also have a significant impact on the tendered costs.
- 6.4.6 The risk of changes within Prudential Borrowing interest rates is being managed through the constant monitoring of rates and such sensitivity being modelled as appropriate.
- 6.4.7 There is a risk that the vacant remaining floors are not let or take longer than anticipated to let, thereby affecting the return on investment for these floors. This risk is being mitigated through some current feasibility work into uses and by the knowledge that without the shell and core works, these floors would likely be vacant forever.
- 6.4.8 Similarly, there is a risk that the floors intended for use by Coventry University for the Cultural Hub might be vacant for a period of time beyond the agreed term. This risk is being mitigated through detailed modelling assumptions and through the overall impact that the refurbishment work will have on attracting future lettings.

## **6.5 What is the impact on the organisation?**

6.5.1 The impact to the organisation will be primarily on officers within Finance, Business, Investment and Culture, Property Services and Development and Legal Services Divisions, who will be responsible for undertaking the work to conclude the negotiations to enter into the Agreements for Leases and Leases as well as running a significant project ensuring it meets its main objectives and full potential.

## **6.6 Equalities / EIA?**

6.6.1 Section 149 of the Equality Act 2010 requires the Council in the exercise of its functions to have due regard to the need to:

eliminate discrimination, harassment, victimisation and other form of conduct prohibited under the act; and,

to advance equality of opportunity and to foster good relations between persons who share a relevant protected characteristic (age, disability, gender re-assignment, pregnancy and maternity, race, religion and belief, sex, and sexual orientation) and persons who do not share it.

6.6.2 Having regard to the need to advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it involves having due regard, in particular, to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- take steps to meet the needs of the persons who share that characteristic that are different from the needs of persons who do not share it; and,
- encourage persons of the relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

6.6.3 The Equality Duty has been considered and it is felt that an Equalities Impact Analysis is not required as the proposal's concerns are for commercial reasons and no Council service or group will be impacted.

## **6.7 Implications for (or impact on) climate change and the environment?**

6.7.1 The professional design team for the project include the specific appointment of a sustainability consultant – Eight Associates – who were commissioned to produce a sustainability statement.

6.7.2 The sustainability statement demonstrated the development's holistic approach to sustainable design and construction. It summaries the contribution that the design will make to creating a more sustainable development, drawing on information provided by specialist consultants and design reports and identifying key features intrinsic to achieving low carbon development.

6.7.3 The design team has significant experience in delivering schemes that are considered highly sustainable, either through application of formal green building rating systems, such as BREEAM and Home Quality Mark, as well as applying benchmarks from standards such as Passivhaus Design and adopting precedents from industry exemplary sustainable developments.



6.7.4 The scheme will adopt the following sustainable features:

- Energy strategy info to be confirmed by ESD
- Implement a site waste management plan and stringent resource efficiency benchmarks
- Follow best practice policies in terms of air, water and ground pollution and appoint a contractor who will register for the Considerate Constructors Scheme
- Achieve a 25% improvement in water consumption (litres/person/day) compared to BREEAM's notional baseline performance
- Utilise sustainable transport, including access to public transport and inclusion of cycle storage facilities
- Minimise embodied carbon through efficient design, procurement of materials from a local source, or with a high-recycled content
- Be of high build quality, surpassing the minimum Building Regulations
- Ensure all materials are responsibly sourced and of low environmental impact where feasible
- Consider health and wellbeing through design and operational procedures, including optimum indoor air quality and thermal comfort
- Protect the existing ecological value of the site.

## 6.8 Implications for partner organisations?

6.8.1 The delivery of the proposal outlined in this Report will secure benefits for each of the Collections Centre partners as follows:

**Arts Council England** –The proposed New Collections Centre offers ACE the opportunity to increase capacity and efficiency through a single, long-term solution. The partnership, city centre Collections Centre model provides further opportunities to grow audiences and expand public access to the Arts Council Collection, with dedicated shared spaces where school pupils, community groups, researchers and professionals can access and experience the Collection. The proposal also provides the opportunity for ACE to directly respond to several of the recommendations from The Mendoza Review (2017), particularly in relation to dynamic collection curation and management; establishing a strategic approach to sharing skills and infrastructure; and contributing to placemaking and local priorities.

**British Council** – the British Council has also been seeking a long-term solution to its collection requirements. The Collection Centre provides clear benefits to the British Council through: providing ample space for the current Collection with the capability of accommodating future growth; providing a centrally located facility with good transport links (for logistics and improving access for British Council staff, stakeholders, students and professional visitors); allowing for greater collaboration and facility sharing with the Arts Council Collection and city's collections; creating a significant legacy opportunity for the national partners with Coventry UK City of Culture 2021.

**Culture Coventry Trust** – the proposed new Collections Centre facilitates the securing of Coventry's collections, managed by Culture Coventry Trust, into a more bespoke and suitable collections environment, with enhanced public access to the parts of the city's vehicle and human history collections that are not currently on display within current museum exhibitions at the Herbert Art Gallery and Museum; and Coventry Transport Museum. The partnership with two national collections partners further provides an opportunity to significantly enhance and re-imagine the positioning of the Herbert Art Gallery and Museum – through the creation of an enhanced exhibition programme that will enable it to reach wider and more diverse audiences.

**Coventry University** – the involvement of Coventry University in the creation of an aligned Cultural Hub co-located with the Collections Centre provides a unique opportunity to create an international centre of excellence in collections care and management, providing direct managed access to teaching, collections and high-quality facilities for professionals, academics, students and researchers.

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Julie Newman	Chief Legal Officer	-	16/02/2023	20/02/2023
Andy Williams	Director of Business, Investment and Culture	-	16/02/2023	17/02/2023
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## Public report

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Cabinet Member for Policing and Equalities  
Council

16 March 2023  
21 March 2023

**Name of Cabinet Member:**

**Cabinet Member for Policing and Equalities – Councillor A S Khan**

**Director Approving Submission of the report:**

Chief Legal Officer

**Ward(s) affected:**

None

**Title: Proposed Changes to the Constitution**

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**Is this a key decision?**

No

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**Executive Summary:**

The Constitutional Advisory Panel at its meeting on 22 February 2023 considered a number of proposed changes to the Constitution. These were:

- (a) Amendments to the membership of the Health and Wellbeing Board
- (b) Amendments to the Member / Officer Protocol
- (c) Amendments to the delegations in respect of Severance Sums

The Advisory Panel agreed all the proposed revisions with no exceptions or additions.

**Recommendations:**

The Cabinet Member is requested to recommend to Council the approval of recommendations (1) to (3) with immediate effect:

- (1) Amendments to Constitution in respect of the Health and Wellbeing Board to:
  - (a) update the Membership of the Board as outlined in Table 1 in this report and;

- (b) enable the Health and Wellbeing Board to approve the removal of members as well appoint additional persons as appropriate.
- (2) Amendments to the Officer/Member Protocol as detailed in paragraph 2.18 of this report to assist Members when they are dealing with matters that relate to their own personal interests, to raise concerns over these with the Council; and
- (3) Amendments to the delegations in the Constitution in respect of Severance Sums as detailed in paragraph 2.22 of this report in line with the Department for Levelling Up, Housing and Communities' Statutory Guidance, published in May 2022.

Council is recommended to approve the Recommendations (1) to (3) above with immediate effect and authorise the Chief Legal Officer to make any necessary amendments to the Constitution.

**List of Appendices included:**

None

**Other useful background papers can be found at the following web addresses:**

- Department for Levelling Up, Housing and Communities: *Statutory guidance on the making and disclosure of Special Severance Payments by local authorities in England*, published 12 May 2022:  
<https://www.gov.uk/government/publications/special-severance-payments/statutory-guidance-on-the-making-and-disclosure-of-special-severance-payments-by-local-authorities-in-england>

**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?**

The proposals were considered by the Constitutional Advisory Panel at its meeting on 22 February 2023 (except where specified)

**Will this report go to Council?**

Yes – 21 March 2023

## **Report title: Proposed Changes to the Constitution**

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

- 1.1 The Council's Constitution sets out how the Council carries out its business and makes decisions. It is a living document and needs to be updated from time to time to ensure that it reflects changes in practices within the Council.
- 1.2 The Constitutional Advisory Panel at its meeting on 22 February 2023 considered a number of proposed changes to the Constitution. These were:
- (a) Amendments to the membership of the Health and Wellbeing Board
  - (b) Amendments to the Member / Officer Protocol
  - (c) Recommendations in respect of the Audit Committee and Functions of Council in respect of Severance Payments
- 1.3 Further details of the main changes proposed are set out in Section 2 of this Report.

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

#### (a) Amendments to the Membership of the Health and Wellbeing Board

- 2.1 The membership of the Health and Wellbeing Board (HWBB) was reviewed by the Board on 23 January 2023 following the establishment of the Integrated Care Board. The HWBB recommended the following to the Constitutional Advisory Panel:
- 1) That the Membership of the Board be updated as outlined in Table 1
  - 2) That the Constitution be amended to enable the Health and Wellbeing Board to approve the removal of members as well appoint additional persons as appropriate.
- 2.2 The Membership of the HWBB requires reviewing due to the establishment of the Integrated Care Board. This amalgamates the two Coventry and Warwickshire Clinical Commissioning Group seats with the one for Coventry and Warwickshire Integrated Care System.
- 2.3 There are two seats - Voluntary Action Coventry (VAC) and Coventry and Rugby GP Federation which do not have nominated Members. VAC stepped down from their seat in October 2021 and there is no other organisation which represents the wider voluntary and community sector. The Coventry and Rugby GP Federation has become the Coventry and Rugby GP Alliance. Representatives of the Coventry and Rugby GP Alliance have not attended a meeting since February 2017.
- 2.4 To enable voluntary and community sector representation at the meetings, appropriate organisations, based on the agenda items, will be invited to each HWBB meeting.

- 2.5 The Cabinet Member for Adult Services currently sits on HWBB as a nominee of the Leader for the “One Additional Councillor” place. It is recommended this seat be amended from “one additional Councillor nominated by the Leader” to the Cabinet Member for Adult Services.
- 2.6 This change aligns with the set up for Public Health and Children’s Services whereby the Directors are statutory appointments and the Cabinet Members for Public Health and Sport and Children and Young People are allocated a HWBB seat, as the Director of Adult Services is also a statutory appointment.
- 2.7 Reprofiting this seat from a nominee of the Leader to Cabinet Member for Adult Services maintains the ratio of Elected Members on the HWBB.
- 2.8 A full list of Members and suggested recommendation is outlined below in **Table 1**.
- 2.9 The quorum is one half of the total number of members plus one member and updating the membership will help to ensure that the meetings are quorate. This must include at least one of the following; an Elected Member, Integrated Care Board representative and Local Authority Director.
- 2.10 The Constitution allows Members to nominate a substitute to attend the meeting providing notice of one hour prior to the meeting start time is given. This also assists in achieving a quorum.
- 2.11 The Constitution allows the HWBB to appoint additional persons as appropriate to the Board. It is recommended that the Constitution be amended to give the Board the ability to amend the non-statutory or non-Elected Member appointments (detailed below). This will allow the Board to be responsive to organisational changes.
- 2.12 **Recommendations for amendments**
- 2.12.1 The current membership is below in the first two columns with recommendations for the amendments from the Advisory Panel to the Cabinet Member to recommend to Council in the right-hand column:

**Table 1**

	<b>Position / Organisation</b>	<b>How Appointed</b>	<b>Recommendation</b>
(a)	Leader of the Council*:	Nominated by Leader	Retain
(b)	Cabinet Member (Public Health and Sport):	Nominated by Leader	Retain
(c)	Cabinet Member (Children and Young People):	Nominated by Leader	Retain



(d)	One additional councillor nominated by the Leader:	Nominated by Leader	Update to: Cabinet Member (Adult Social Care)
(e)	Conservative Group representative:	Nominated by Leader	Retain
(g)	Director of Adult Services**	Statutory appointment	Retain
(h)	Director of Children's Services**	Statutory appointment	Retain
(i)	Director of Public Health and Wellbeing**	Statutory appointment	Retain
(j)	Coventry City Council Chief Partnerships Officer	1 Representative	Retain
(k)	Coventry Healthwatch**	2 representatives	Retain
(l)	Coventry and Warwickshire Clinical Commissioning Group:	2 representatives	Update to: Coventry and Warwickshire Integrated Care Board
(m)	NHS England:	1 representative	Retain
(n)	Voluntary Action Coventry:	1 representative	Remove Following VACs resignation, there is no one organisation that represents the sector. Appropriate representatives from the voluntary and community sector will be invited to Health and Wellbeing Board meetings.
(o)	Coventry University:	Vice-Chancellor (or representative)	Retain
(p)	Warwick University:	Vice-Chancellor (or representative)	Retain
(q)	West Midlands Police:	1 representative	Retain
(r)	West Midlands Fire Service:	Operations Commander Coventry	Retain

(s)	Coventry and Warwickshire Partnership Trust:	1 representative	Retain
(t)	University Hospitals Coventry and Warwickshire:	Chief Executive or representative	Retain
(u)	Coventry and Rugby GP Federation:	Chief Executive or representative	Remove
(v)	Coventry and Warwickshire Integrated Care System:	1 representative	Remove now the ICB is a formal member as at (k).

\*- at least one Councillor of the Local Authority must sit on the Board

\*\*Statutory appointments

The proposed change in relation to amending the membership here at paragraph 2.2 of the Terms of Reference is as follows:

**2.2 In addition to the appointments referred to in 2.1 above, the Board may amend the non-statutory and non Elected Member appointments to the Board as it thinks appropriate.**

(b) Amendments to the Member / Officer Protocol

- 2.13 On 15 December 2022, the Ethics Committee reviewed proposed revisions to the Member / Officer Protocol as a result of its observations at the Standards Hearing on 8 July 2022 in respect of Elected Members, when they are dealing with matters that relate to their own personal interests that need to be raised with the Council and recommend to the Constitutional Advisory Panel that additional wording be inserted to *Part 4D – Member / Officer Protocol*, to afford greater clarity to Members
- 2.14 The Member / Officer Protocol was approved in 2016. The Protocol is beneficial as it sets out for both Members and Officers what is expected of them in their respective roles and what they can expect from each other. While experienced Councillors and Officers may understand and appreciate the different roles that they have, newly elected members and recently appointed employees may find it helpful to have these roles explained in some detail. Understanding what is, and is not, expected of each other can assist in maintaining and improving excellent member/officer working relationships.
- 2.15 The Protocol was drafted to reflect current practices within the Council and best practice in other local authorities.
- 2.16 The Protocol also offers guidance on some of the issues which most commonly arise in relation to Member / Officer relationships. It is partly a statement of

current practice and convention. In some respects, however, it seeks to promote greater clarity and certainty. In particular, it covers the behaviour that is expected between Members and Officers. The Protocol gives guidance only but it may be taken into account if there is a complaint about a Member or an Officer.

2.17 The Protocol clarifies the different but complementary roles of Officers and Members and sets what each can expect from the other. In addition it contains more detailed guidance on matters such as:

- Complaints
- Member enquiries
- Information and advice
- Member briefings
- Support services
- Monitoring and periodic review of the Protocol is the responsibility of the Monitoring Officer

## 2.18 Recommendations for amendments

2.18.1 The Ethics Committee at the Standards Hearing on 8 July 2022 noted that it is challenging for Elected Members, when they are dealing with matters that relate to their own personal interests, to raise concerns over these with the Council.

2.18.2 The Advisory Panel recommended that the Cabinet Member recommend to Council that additional wording is added to the Protocol at paragraph 3.2(j), under the heading of “Expectations” as follows (drafted in red), with the remaining sub paragraphs becoming (k) and (l) (as indicated in red):

## 3. Expectations

### 3.1 What Members can expect from Officers:...

### 3.2 What Officers can expect from Members:...

- (i) **Members should not use their position or relationship with Officers to advance their personal interests or those of others or to influence decisions improperly.**
- (j) **Members may occasionally find that they have a personal interest in a matter that needs to be raised with Officers. Members should be clear about their personal interest and use appropriate and formal language when contacting Officers in this instance. Close personal familiarity between individual Members and Officers can damage the relationship of mutual respect and prove embarrassing to Members and Officers. Members and Officers are encouraged to contact the Monitoring Officer for advice if they are concerned about this;**

- (k) Members should not make detrimental remarks about individual Officers during meetings, in public or to the media; and**
- (l) Members should at all times comply with the Member Code of Conduct.**

(c) Severance Sums

- 2.19 The Department for Levelling Up, Housing and Communities (DCLUH) has issued statutory guidance (the SSP Guidance) under the Local Government Act 1999 (the 1999 Act) on Special Severance Payments (SSPs). SSPs are payments made to employees, officeholders, workers, contractors, and others outside of statutory, contractual or other requirements when leaving employment in public service. Employers may sometimes consider making such a payment in situations where the individual concerned resigns, is dismissed, or agrees a termination of contract. Which types of payments are SSPs will vary according to an employee's particular circumstances.
- 2.20 The Government expects that any SSPs should be approved according to the following process:
- payments of £100,000 and above must be approved by a vote of full council.
  - payments of £20,000 and above, but below £100,000, must be personally approved and signed off by the Head of Paid Service, with a clear record of the Leader's approval and that of any others who have signed off the payment
  - payments below £20,000 must be approved according to the local authority's scheme of delegation.
- 2.21 Where the proposed payment is to the Head of Paid Service, to avoid a conflict of interest it is expected that the payment should be approved by a panel including at least two Independent Persons.
- 2.22 It is proposed that these additional delegations are included within the Constitution with the payments below £20,000 being delegated to the Chief People Officer.
- 2.23 **Options**
- 2.23.1 **Option 1:** do nothing. This is not recommended as the Constitutional Updates identified above allow for compliance with the law, more efficient use of the Council's resources and reflect changes.
- 2.23.2 **Option 2:** approve the Constitutional Updates for the reasons as detailed at Option 1.

**Recommendations:**

The Cabinet Member is requested to recommend to Council the approval of the following Recommendations with immediate effect.

- (1) Amendments to Constitution in respect of the Health and Wellbeing Board to:
  - (a) update the Membership of the Board as outlined in Table 1 in this report and;
  - (b) enable the Health and Wellbeing Board to approve the removal of members as well appoint additional persons as appropriate.
- (2) Amendments to the Officer/Member Protocol as detailed in paragraph 2.18 to assist Members when they are dealing with matters that relate to their own personal interests, to raise concerns over these with the Council; and
- (3) Amendments to the delegations in the Constitution in respect of Severance Sums as detailed in paragraph 2.22 in line with the Department for Levelling Up, Housing and Communities' Statutory Guidance, published in May 2022.

Council is recommended to approve the Recommendations numbered (1) to (3) above with immediate effect and authorise the Chief Legal Officer to make any necessary amendments to the Constitution arising from recommendations (1) to (3).

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

The proposed amendments have been considered by the Constitutional Advisory Panel who recommended their approval.

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

4.1 Any actions arising from this report will be implemented immediately.

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

#### **5.1 Financial implications**

There are no specific financial implications arising from the recommendations within this report.

#### **5.2 Legal implications**

There are no specific legal implications arising from this report. The issues referred to in this report will assist the Council in complying with its obligations under section 27 of the Localism Act 2011.

### **6 Other implications**

None

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

Not applicable.

**6.2 How is risk being managed?**

There is no direct risk to the organisation as a result of the contents of this report.

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

No direct impact at this stage.

**6.4 Equalities / EIA**

There are no public sector equality duties which are of relevance at this stage.

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

None.

**6.6 Implications for partner organisations?**

None at this stage.

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Council

21 March 2023

**Name of Cabinet Member:**

Cabinet Member for Policy and Leadership - Councillor G Duggins

**Director approving submission of the report:**

Chief Legal Officer

**Ward(s) affected:**

All

**Title:**

Electoral Review: Council Size and Forecasting Submissions - Local Government Boundary Review

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**Is this a key decision?**

Yes

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

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**Executive summary:**

The Local Government Boundary Commission have commenced an electoral review of Coventry. The review will look at whether the boundaries of wards within the local authority need to be altered to ensure fairer representation at local government elections.

Coventry City Council meets the Commission's criteria for electoral inequality with 6 of 18 wards (33%) having a variance over 10%. In addition, the last electoral review of Coventry City Council was completed in 2003, meeting the Commission's duty, set out in law, to review every authority from 'time to time'. The Commission has interpreted this to be about 12 – 14 years

This report is the preliminary work required as part of the review process to consider the future council size and electoral forecasting submissions.

**Recommendations:**

That Council:

1. Supports Option 3 as detailed in Appendix 1 of the report to retain the existing Council size as part of the review process and that the Local Government Boundary Commission for England be informed accordingly.
2. Approves Appendix 2 of the report as the Council's electorate forecast submission to the Local Government Boundary Commission.

**List of Appendices included:**

The following appendices are attached to the report:

- Appendix 1 – Council size submission
- Appendix 2 – Electoral forecast submission

**Background papers:**

List here:

Local Government Boundary Commission for England – Electoral Review of Coventry City Council – A Guide for Councillors

Local Government Boundary Commission for England – technical guidance for number of councillors –

Local Government Boundary Commission for England – technical guidance for electoral forecasting  
<https://www.lgbce.org.uk/how-reviews-work/technical-guidance>

**Other useful documents**

List here:

Census Data 2021 - <https://www.coventry.gov.uk/facts-coventry/population-demographics/4>

**Has it or will it be considered by scrutiny?**

No – matter reserved to Council.

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

Yes – Cabinet Member for Policing and Equalities Electoral Arrangements Advisory Panel

**Will this report go to Council?**

Yes – 21 March, 2023

**Report title: Electoral Review: Council Size and Forecasting Submissions - Local Government Boundary Review**

**1. Context (or background)**

- 1.1. The Local Government Boundary Commission for England (LGBCE) commenced its review of Coventry City Council started in October 2022.
- 1.2. The report at Appendix 1 provides the LGBCE with the Council's view on the optimal Council size for Coventry for it to consider as part of the review.
- 1.3. The Council is also required to provide the LGBCE with electoral forecasts up to 2029 taking into account predicted housing development and population growth. This is set out in Appendix 2.

**2. Options considered and recommended proposal**

Detailed in Appendix 1 are the options in relation to the council size which were considered. There are no other options in relation to the electoral forecasting.

**3. Results of consultation undertaken**

- 3.1. None required for this report.

**4. Timetable for implementing this decision**

- 4.1. This report is the preliminary stages of the review. The next stage will commence in May 2023 and the final recommendations for the Local Government Boundary Commission will be implemented at the local elections in May 2026.

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

- 5.1. Financial Implications  
None in relation to this report.
- 5.2. Legal Implications  
The LGBCE is an independent body established by Parliament in April 2010. The LGBCE has a statutory duty to undertake electoral reviews.

**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 LGBCE is conducting an electoral review of Coventry City Council to ensure fairer representation at local government elections.

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

There are no risks associated with this report.

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

None in relation to this report.

**6.4. Equalities / EIA?**

No equalities impact assessment has been completed in relation to this report.

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

None.

**6.6. Implications for partner organisations?**

None.

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**Service: Electoral Services**

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Legal: Julie Newman	Chief Legal Officer	Law and Governance	9/3/23	9/3/23
		-		
Members: Cllr George Duggins	Cabinet Member for Policy and Leadership	-	9/3/23	9/3/23
Cllr Gary Ridley	Leader of the Opposition		9/3/23	10/3/23

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## Appendix 1:

### Local Government Boundary Commission for England Review of Council Size: Coventry City Council Size Submission

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## **Introduction**

1. The Local Government Boundary Commission for England's (LGBCE) review of Coventry City Council started in October 2022.
2. The review was triggered due to 6 out of 18 wards being imbalanced across the City therefore generating an unfair representation at local government elections. These 6 wards have a variance greater than +/- 10% compared to the average. In addition to this the last electoral review of Coventry City Council was completed in 2003 and the Commission has a duty set out in law to review every authority from 'time to time'. The Commission interprets this to be approx. 12-14 years.
3. The Commission will seek to deliver electoral equality for electors in local elections in this review.
4. This submission presents Coventry City Council's 'Council Size Submission'. This provides the LGBCE with the Council's view on the optimal Council size and supporting evidence across three broad areas. These areas are:
  - Strategic Leadership – the role of Councillors in decision making and council business demonstrating how responsibilities are distributed across the Council.
  - Accountability – the role of Councillors in holding decision makers to account and to ensure that the Council can discharge its responsibilities to outside bodies.
  - Community leadership – how Councillors represent and provide leadership in their communities and how this affects workload responsibilities.

## **Methodology**

5. This report has been produced by a project team led by the Electoral Services Team and has been overseen by the cross Party Electoral Arrangements Advisory Panel.
6. To provide an evidence base for this report, a Councillor Survey was sent out to all 54 councillors. 32 councillors returned the survey giving a response rate of 59%.

## **Background about the city of Coventry**

7. Coventry is a diverse and cohesive city with a relatively young population, with a median age of 35 years compared to the UK average of 40 years. In recent years the city has experienced an 8.9% growth in its population, from 316,915 in 2011 to 345,300 residents on Census Day 2021. This is higher than the rate in the region (6.2%) or England (6.6%), making Coventry the seventh-fastest growing local authority in the West Midlands region.
8. In 2021, just over one-fifth (22%) of the city's population are children and young people aged under 18, 65% are of working-age (18-64), and the remaining 13% are aged 65 and over. As well as experiencing notable growth amongst some age groups of children, the city's population has grown particularly amongst younger adults. This is contributed to by the growth and success of the city's two universities in attracting students locally and internationally. In addition the growth is fuelled by migration to the city of young adults to work and creation of better-paid jobs in certain sectors of the local economy.

9. The [One Coventry Plan](#) sets out our shared vision and priorities for the city. The plan outlines the city council's approach to:

- Increasing the economic prosperity of the city and region;
- Improving outcomes and tackling inequalities within our communities
- Tackling the causes and consequences of climate change.

The Council will achieve this by being:

- A council with a strong and sustainable financial position, with resources and assets that are aligned with our priorities
- A council that plays a key role as a civic leader, working in genuine partnership with local residents, communities and partners.

The achievement of the vision and priorities in the plan are fundamental to Coventry growing as a city and ensuring our residents and businesses prosper. Examples of how the One Coventry Plan aims to achieve improved outcomes include;

- Positioning the city to benefit from the transition to a net zero economy by capitalising on the opportunities presented by the green industrial revolution;
- Securing investment in schemes such as Coventry Very Light Rail and the West Midlands Gigafactory, ensuring job creation and public infrastructure development that will support Coventry and wider West Midlands;
- Dealing with the issues most important to our communities, such as the cost-of-living crisis.

10. The Council has gone from strength to strength in the last few years with several notable achievements. These include:

- In 2019 being shortlisted for the prestigious national award of Council of the Year as part of the LGC Awards, which celebrates excellence in local government.
- In July 2022, the Council's Housing and Homelessness Service was named the Large Team of the Year in the LGC Awards, against a backdrop of a record number of entries from council teams across the UK.

11. The Council has also ensured high profile national events for the city to the benefit of its residents and those further afield. This includes Coventry hosting:

- The UK City of Culture in 2021/22 – which enabled the Council to secure over £90 million in external funding to deliver the much-improved public realm work in the city centre and investment in many of the city's cultural and heritage venues;
- The MOBO Awards and the MOBO Fringe Festival in December 2021;
- The Radio One Big Weekend in May 2022;
- Being a host city for three sports of the Birmingham Commonwealth Games in July 2022;
- Being the sole host of the International Children's Games – consisting of more than 1,500 young people aged between 12 and 15 from 31 countries across the world competing in seven sports – in August 2022.

12. Our COVID-19 journey across the city has been a truly 'One Coventry' response. We have worked closely with our local NHS partners, Public Health England, care services, universities, schools and businesses across Coventry to minimise the impact and harm of COVID-19. The One Coventry response has ensured a coordinated response across the city, with a focus on how the council and partners can protect and maintain critical services to support residents and reduce the burden on those most vulnerable and under-represented.
13. The approach taken has been influenced and led by 'One Coventry' values which focus on working together with Partners to improve the City and people's lives. This is achieved by being open, fair and transparent, involving the right people, embracing new ways of working to continuously improve the services we offer, engaging with our residents and empowering our employees to enable them to do the right thing. This is enabled by the principle of putting diversity and inclusion at the heart of all we do.
14. Coventry City Council has facilitated a One Coventry response to the rising costs of living, led by Councillors and in partnership with community, voluntary, statutory sector organisations and businesses. In Coventry there are strong foundations in place, created through our partnership and community work, that has been built upon to enable a comprehensive and impactful response to the crisis. By targeting existing resources and engagement at the most vulnerable groups in our communities it is possible to support those with the greatest need.
15. Coventry's partnership response has included the creation of an online single point of access hub for all cost of living and wellbeing related information (<https://www.coventry.gov.uk/cost-living-wellbeing-support>). This contains information about financial support with energy and housing costs, support with food, fuel and other essential items, support to households at financial risk, and information and advice on benefits, debt and housing matters.

### **Coventry's demographics**

16. Within the LGBCE's guidance it is recommended to examine "demographic pressures" upon the local authority. Examples included were "distinctive age profiles, migrant or transient populations", or whether large growth in the population is anticipated. Therefore, this section details recent and projected demographic trends.
17. The last boundary review undertaken by the LGBCE in Coventry was in 2003. According to the Office for National Statistics' 2021 mid year estimates, between 2003 and **2021** (the latest year available), the number of people living in the City increased from **300K** to **343K**; a growth of **14%**. The population of adults aged 18+ in Coventry (the base population from which the electorate is drawn) increased from **232K** to **266K** in 2021, a growth of **15%**.
18. The LGBCE uses the concept of registered electorate variance from the Coventry average per ward and will intervene by requesting a review and five and ten year forecast if over 30% of all wards have an electorate of +/- 10% from



the average electorate for the authority. However, within the population of adults aged 18+, not all adults will be registered to vote. This is important because the LGBCE uses the number of electors per ward (people registered to vote) to determine “electoral fairness”.

19. The table 1 below outlines the data sourced from the LGBCE which was used to determine the requirement for the review. Based on the December 2021 electoral register, Coventry had three wards (16%) with a +10% variance (Henley, Longford and Lower Stoke) and three wards (16%) with a -10% variance (St Michael’s, Wainbody and Whoberley).

Table 1 – Voter ratios in Coventry for 2021 (LGBCE sourced data)

Ward Name	Councillors	Electorate*	Variance*
Lower Stoke	3	15,188	19%
Henley	3	14,655	15%
Longford	3	14,081	11%
Woodlands	3	13,630	7%
Holbrook	3	13,467	6%
Westwood	3	13,210	4%
Upper Stoke	3	13,108	3%
Binley & Willenhall	3	12,977	2%
Foleshill	3	13,036	2%
Radford	3	12,958	2%
Bablake	3	12,855	1%
Wyken	3	12,547	-1%
Sherbourne	3	11,979	-6%
Earlsdon	3	11,801	-7%
Cheylesmore	3	11,731	-8%
Whoberley	3	11,191	-12%
St. Michael's	3	10,659	-16%
Wainbody	3	10,012	-21%
Coventry	54	229,085	12,727

\*Source LGBCE review documentation using December 2021 electoral register, where the variance calculation is using 12,727 as the average number of electors per ward.

20. For the LGBCE review, to ascertain the population size into the future, the starting point is the expected adult population drawn from the Office for National Statistics’ ‘Sub-National Population Projections’ (SNPP). The most recent SNPP (**2018 - based**) projects the City’s population from 2018 until **2043**.
21. Furthermore, the LGBCE requires an estimate of the proportion of the adult population registered to vote. The historical data for Coventry between 2020 and 2023 yields an average ratio of **0.76%** electorate to adult population, which has been used for the purposes of this forecast (See Appendix 2 Forecasting Report).

22. This gives an estimated electorate via the SNPP method of **250K** electors by 2029, but this figure has been revised to **247K**, to take account of the council's housing development forecast plan from 2022 to 2031+ (See Appendix 2 electorate forecasting submission).
23. Coventry is and will continue to be an expanding, young and diverse population, given its large and growing migrant and student (especially international) populations.
24. According to the 2021 Census, the population grew by 9% since the 2011 Census (compared with 7% nationally and 6% for the West Midlands region) and the median age remained the same (34 years of age) (compared with 40 years of age for England, which is growing year on year).
25. The results from the 2021 Census also suggest: 28% of usual Coventry residents are born outside the UK (compared with 18% for England), 45% identify with an ethnic group other than White: English, Welsh, Scottish, Northern Irish or British (compared with 26% for England) and 18% have a non-UK identity only (compared with 10% for England), with notably varying concentrations of these communities across wards.
26. The 2021 Census also reports variation across Wards in where students live, with, notably, proportionally large populations reported for St Michael's, Wainbody and Westwood, exceeding the 15% of the total population though to be students 16+ years.

<b>Economic activity status – ONS Census 2021</b>	
<b>Ward</b>	<b>Students 16+</b>
Bablake	6%
Binley and Willenhall	7%
Cheylesmore	8%
Earlsdon	11%
Foleshill	14%
Henley	8%
Holbrook	9%
Longford	8%
Lower Stoke	12%
Radford	11%
<b>St Michael's</b>	<b>52%</b>
Sherbourne	10%
Upper Stoke	11%
<b>Wainbody</b>	<b>33%</b>
<b>Westwood</b>	<b>20%</b>
Whoberley	14%
Woodlands	6%
Wyken	7%
<b>Coventry</b>	<b>15%</b>

27. Given the more transitional nature of student and new migrants residents, population numbers year on year in the future are likely to be more volatile in the wards of St. Michael's, Wainbody, Foleshill, Upper Stoke, Lower Stoke and Radford.
28. Council Officers are currently working with ONS colleagues to improve the methodology used to project population numbers in the future for Coventry and Coventry wards, which takes better account of these more transitional communities.

## **Coventry's regional role within the West Midlands**

### ***West Midlands Combined Authority***

29. Coventry City Council played a pivotal role in setting up the West Midlands Combined Authority (WMCA) moving powers from central government to locally elected politicians in the West Midlands. The WMCA is composed of 18 local authorities (Coventry being one of the seven constituent authorities) and four Local Enterprise Partnerships (LEPs). It was formed in response to the context of international, national and regional challenges including skills deficits, unemployment, austerity, increasing demand for public services and the need to improve connectivity within the West Midlands.
30. The purpose of the WMCA is to drive inclusive economic growth and support healthier, happier, better connected and more prosperous communities in the region through co-operation. To propel this economic growth, the WMCA is focussed on the following key areas: economic growth, environment, health and wellbeing, housing and land, productivity and skills, public service reform and transport.
31. The creation of the WMCA meant that certain key regional functions (such as skills) were devolved down from Central Government to the WMCA. However, this regional approach entails more responsibilities and duties for Councillors in the region than historically. This is especially important considering Coventry is one of the constituent members (with full voting rights) of the WMCA. The seven Council's which are constituent members work together with the other partner bodies and the directly elected mayor to improve and develop the region, particularly in regard to those strategic issues that cross local authority boundaries. There are eleven Boards and Committees that Coventry Councillors are appointed to, including the WMCA Board.
32. It should be noted that members of the Council's opposition group do not hold positions within the WMCA. For this reason, the impact of the WMCA's creation only impacts ruling group Councillors.

### ***Other regional/national councillor involvement***

33. The Coventry and Warwickshire LEP was originally established to promote business growth and prosperity within the region which has input from councillors this is due to change due the Levelling Up White Paper of February 2022 which mandated Local Enterprise Partnerships (LEPs) to integrate into local democratic institutions from 1<sup>st</sup> April 2023 onwards. As such, Coventry & Warwickshire LEP is closing at the end of March 2023, but Coventry & Warwickshire Growth Hub will become a standalone entity and will also

integrate existing Coventry & Warwickshire business networking functions. The Growth Hub will therefore have a new board of directors and revised governance structure as a result, and Coventry City Council is expected to be one of the Board members, with Councillors also reviewing updates on the work of the Growth Hub as required.

34. The WMCA and the Coventry and Warwickshire sub-regional economic planning exhibit key areas of regional work that Councillors are involved in, however, Councillors regional responsibilities go beyond this. Councillors represent Coventry City Council on numerous regional bodies, which include the Canal and Rivers Trust Regional Advisory Board, the West Midlands Strategic Migration Partnership, Birmingham Airport Consultative Committee, the Regional Flood and Coastal Committee, West Midlands Fire and Rescue Authority, West Midlands Pension Committee, the Board of West Midlands Rail Ltd,
35. Councillors are involved in several national bodies, including the Bus Lane Adjudication Service Joint Committee, the LGA General Assembly, the Parking and Traffic Regulation Outside London Adjudication Joint Committee, the Special Interest Groups of Municipal Authorities,

### ***International involvement***

36. Coventry is known throughout the world as a city of peace and reconciliation and is recognised as playing a key role in establishing twinning relationships between communities across the world. Coventry maintains active relationships with a small number of its twin cities, including Kiel and Dresden in Germany which like Coventry suffered significant loss of life and damage during the second world war. Civic exchanges involving councillors mark significant occasions such as attendance at Remembrance commemorations and provides a foundation for other dialogue, for example the current link between adult education in Kiel and Coventry on the 'Shared Lives' project that focuses on migration and integration through language learning.
37. Coventry operates on the global stage to deliver economic development, attract inward investment and provide international trade opportunities to businesses based here. The City works closely with the Department for Business and Trade and other partners nationally and internationally to develop and attract opportunities for bi-lateral trade and investment. This activity involves councillors potentially supporting the hosting of delegations from key overseas regions or attending market visits to areas of opportunity with significant investor leads. In addition, attending key international events such as MIPIM France (the world's leading real estate event) is essential to promote the city's key investment and regeneration opportunities.
38. Coventry has two leading universities (Coventry University and the University of Warwick) with a global reach. Both universities have numerous international hubs with locations including China, the Middle East, Africa, Europe and North America. Collectively the universities are home to 67,000 students with a third of these being from overseas representing 290 different nationalities.
39. Further international reach is generated through the major events delivered within the City. Recent events of significance include UK City of Culture 2021, hosting elements of the 2022 Birmingham Commonwealth Games and the 2022 International Children's Games.

### ***Growing involvement***

40. Coventry Councillors have a significant presence with the region and nationally. In total 12 councillors are involved in 20 different regional meetings/committees/boards. Nationally, 11 councillors are involved in 14 different national meetings/committees/boards.
41. According to the Councillor Survey, 3% of respondents spend over 15 hours a month on regional business. 40% spend between 1-5 hours on average a month on regional business, with over half of respondents 54% spending no time on regional business a month.
42. Regional working plays an important part within many Councillors' roles, especially for Councillors with executive responsibilities. Regional work is only expected to increase as central governments ambitions for greater devolution are realised.

### **Coventry's political context and governance model**

43. Coventry City Council is made up of 54 councillors. The city is divided into 18 wards, each of which is represented by three Councillors. The Council has been under Labour control since 2010 with seats currently held by 38 Labour,

15 Conservatives and 1 Green councillors. Councillors are elected by thirds, with elections held over a four-year cycle. The most recent elections were in May 2022, and the next 'fallow year' is in 2025.

44. The Council has operated the Leader and Cabinet model since it was introduced in 2000. At the present time, in addition to the Leader and Deputy Leader, there are 10 Cabinet Members, each with their own portfolio of responsibilities. There are also 5 Deputy Cabinet Members who support Cabinet Members in carrying out their responsibilities but are not Members of the Executive.

<b>Member</b>	<b>Portfolio</b>
<p>The Leader Policy and Leadership</p> <p>Councillor G Duggins</p>	<p>One Coventry Council Plan City of Culture 2021 Legacy Scrutiny External relations / public relations Image and reputation Chair of Cabinet / Management Board meetings Emergency Planning Regional Matters West Midlands Combined Authority Corporate Governance Information Management and Governance Risk Management</p>
<p>The Deputy Leader Policing and Equalities</p> <p>Councillor A S Khan</p> <p>Deputy Cabinet Member Councillor P Akhtar</p>	<p>Community Safety Community Cohesion Public Protection and Licensing Prosecution and Enforcement Democratic Services, including Lord Mayor's Electoral Services Equalities Legal Services Training (Members) Constitutional Matters and Political Management Domestic Violence and Sexual Exploitation Local Policing Media Strategy Events Parks International Liaison and diplomacy Peace, reconciliation and twinning Deputising on Leader Items</p>
<p>Cabinet Member Strategic Finance and Resources</p> <p>Councillor R Brown</p>	<p>Strategic Finance Medium Term Financial Strategy Budget Setting External Resources Operational Finance incl. Revenues and Benefits Service Transformation and value for money Procurement Human Resources Organisational Development Key Staff Recruitment and Retention Customer Services Health and Safety</p>

	Pensions
<p>Cabinet Member Children and Young People</p> <p>Councillor P Seaman</p> <p>Deputy Cabinet Member Councillor B Gittins</p>	<p>Children and Families</p> <p>Children and Young People's Social Care</p> <p>Child Exploitation</p> <p>Young People</p> <p>Youth Offending Service</p> <p>Safeguarding</p> <p>*S19 Children Act 2004 Lead Member</p> <p>Fostering and Adoption</p> <p>Corporate Parenting</p>
<p>Cabinet Member Education and Skills</p> <p>Councillor K Sandhu</p>	<p>Post 16 Education and Training</p> <p>Schools</p> <p>Early Years</p> <p>Special Educational Needs and Disability</p> <p>Libraries</p> <p>Adult Education</p> <p>Higher and Further Education (incl. Universities)</p> <p>Skills and Employability</p>
<p>Cabinet Member Jobs, Regeneration and Climate Change</p> <p>Councillor J O'Boyle</p>	<p>Economic Development</p> <p>City Centre (Regeneration)</p> <p>International Trade and Inward Investment</p> <p>Commercial and Operational Property (including catering)</p> <p>Local Enterprise Partnership</p> <p>Urban Regeneration</p> <p>Transportation</p> <p>Tourism and Marketing</p> <p>Sustainability and climate change</p> <p>Digital Strategy</p>
<p>Cabinet Member City Services</p> <p>Councillor P Hetheron</p> <p>Deputy Cabinet Member Councillor G Lloyd</p>	<p>Highways, Drainage and Lighting</p> <p>Licensing Policy (Hackney Carriage and Private Hire)</p> <p>Public Realm</p> <p>Street Services (Ground Maintenance, Refuse (domestic and commercial), Street Cleaning)</p> <p>Waste Management</p> <p>Flood Management</p> <p>Environment</p> <p>Bereavement Services</p> <p>Traffic Management and Road Safety</p> <p>Parking Policy and Operations</p> <p>Information Technology</p>
<p>Cabinet Member Adult Services</p> <p>Councillor M Mutton</p>	<p>Social Care for Adults and Older People</p> <p>Better Care Fund</p> <p>Transforming Care</p> <p>Carers</p> <p>Adult Safeguarding</p> <p>Adult social care integration with health</p>
<p>Cabinet Member Public Health and Sport</p> <p>Councillor K Caan</p> <p>Deputy Cabinet Member</p>	<p>Health Strategy and Policy</p> <p>Integrated Care Systems</p> <p>Health Inequalities and Marmot</p> <p>Air Quality</p> <p>Local Health Economy</p> <p>Public Health</p>

Councillor G Hayre	Sexual Health Teenage Pregnancies Mental Health Poverty Fuel Poverty Sport and physical activity
Cabinet Member Housing and Communities  Councillor D Welsh  Deputy Cabinet Member Councillor S Nazir (Excluding Planning Policy)	Archives Arts Heritage Museums Conservation Social Enterprise Strategy Mutuals Community and Voluntary Sector Relations Community Centres Refugees and Asylum Seekers Welfare Advice Services Housing and Homelessness Planning Policy

### Scrutiny at Coventry City Council

45. The role of Scrutiny in the Council is vital to ensuring that decision makers are held to account and that policy and strategy are formulated carefully. It is critical to ensuring that the Council's work has positive influence on the residents of Coventry.
46. Scrutiny is a cross-party function of the Council and the majority of non-executive Councillors sit on at least one scrutiny board.
47. Scrutiny at the Council functions in the following manner: Cabinet Members and senior officers are called to public meetings of Scrutiny Boards, in order to provide information on proposed executive decisions as well as service delivery and performance. Decision makers may be questioned or required to provide information on strategies or policies after implementation to monitor progress and ensure accountability. Scrutiny identifies which decisions and service areas to scrutinise.
48. There are also powers within the constitution to call in decisions after they have been made.
49. All of these powers ensures that decision makers are held to account. In order to make the role of scrutiny both more accountable and accessible, some scrutiny meetings are held in community locations.
50. Scrutiny can also require certain public sector external partners responsible for service delivery within the local authority to attend meetings and be held accountable. These partners include health service providers and commissioners, and the police.
51. The Council has a Scrutiny Co-ordination Committee and five scrutiny boards. Each of the board chairs sit on the Scrutiny Co-ordination Committee. This Committee is scheduled to meet eight times a year. Each of the other boards are scheduled to meet six times a year and extra meetings are called when required (see table below). There are also several task and finish review groups that carry out in depth scrutiny into a specific function or topic, lasting between



six months and a year. Their function is to consider a topic or question in detail and to make recommendations to Cabinet.

52. Councillors may be expected to attend one to two meetings a month on average. Each scrutiny board has nine Councillors with task and finish groups having between three to seven Councillors.
53. The number of scrutiny committees within the authority reflects Cabinet Member portfolios as well as service areas.
54. Table 2 of number of Scrutiny Committees

Board/Committee	Members	Frequency	Typical Duration
Scrutiny Co-ordination Committee	9	8 pa	2-3 hours
Finance and Corporate Services	9	6pa	2-3 hours
Education and Children's Services	9	6pa	2-3 hours
Business, Economy and Enterprise	9	6pa	2-3 hours
Communities and Neighbourhoods	9	6pa	2-3 hours
Health and Social Care	9	6pa	2-3 hours
Joint Health Overview and Scrutiny Committee	4	As required	

### Delegated functions Coventry City Council - Planning

55. Non-executive functions (such as planning or licensing) are delegated by the Council to the relevant regulatory committees. The work of these bodies is outlined in more detail below. A range of routine matters are delegated to employees to facilitate the smooth day-to-day running of the Council. These are outlined in detail in the Constitution
56. Due to the growth in external investment leading to multiple large infrastructure projects going ahead within the city, the role of planning in Coventry has never been more important due to a number of large complex housing developments and City Centre regeneration, figures which are below.

Row Labels	Count of Application Reference
+ 2018	80
+ 2019	66
+ 2020	53
+ 2021	63
+ 2022	77
+ 2023	4
<b>Grand Total</b>	<b>343</b>

57. Councillors determine roughly 3% of all planning applications with there being about 300 applications roughly every 3 weeks. 10 (average 3-4 applications per meeting) of these go to Planning Committee. The criteria for whether a planning application is considered by Planning Committee is that it has 5 or more or more objections to it and/or that a Councillor has requested it is

considered by Committee; or that the applicant is a Councillor, senior officer of the Council or an officer from the Planning Department.

58. In Coventry there is a single council wide Planning Committee with no area committees. Cabinet Members do not serve on the Planning Committee, only Councillors with non-executive responsibilities. On average the planning committee takes up to approximately 8 hours of a Councillor's time every 3 weeks (including approximately up to 4 hours of preparation) or 112 hours a year.
59. Table 3

Meeting	Members	Meetings	Typical Duration
Planning Committee	12	17	4 hours

### Delegated functions Coventry City Council - Licensing

60. Licensing authorities are responsible for protecting people's health, safety, and wellbeing as well as the environment and amenities. Supporting these objectives requires a regulatory regime that directs a clear set of service standards and offers advice that supports businesses and residents to thrive and grow. This is the role that licencing plays within the city.
61. Table 4 shows the elements of licencing which are covered by statutory committees (excluding taxi licences).

Scrap Metal Licences	Personal licenses
Premises licenses	Gambling and gaming licenses
Temporary events	Sex Establishments and Sexual Entertainment Venues

NB – Officers have delegated authority in respect of Trading Standards matters and these are therefore omitted from the table

62. As demonstrated by Table 3 (concerning Planning), Statutory Committees take up a minimum of 30 hours every year for each of the 15 Councillors.
63. Statutory Sub-Committees can take up over 36 hours every year. These meetings are attended by three Councillors from the membership of the main Licensing and Regulatory Committee. The membership of Sub-Committees meetings are ad hoc taking into consideration Member availability, experience and the location of the premises concerned, whilst ensuring political proportionality is met. Committee meetings have a standing membership with Sub-Committee meetings being ad-hoc. Table 5 below evidences the commitment and time taken for the various licencing panels within the council.

64. Table 5 – Membership, frequency and typical duration of Licencing meetings

<b>Name</b>	<b>Members</b>	<b>Meetings</b>	<b>Typical duration</b>
Statutory Committee	15	12 (one per month are scheduled but sometimes cancelled if not required)	2.5 hours
Statutory sub-committee	3	These are held when required  6-8 (Review and Application Hearings) are held on average per year	3.5 hours

**Delegated functions Coventry City Council – Taxi Licensing**

65. Coventry City has 499 licensed hackney carriage vehicle, 260 licensed private hire vehicles, 731 hackney carriage drivers, 372 private hire drivers and 31 private hire operators. Officers have certain powers of delegations which include with consultation with the Chair/Deputy Chair of the Licensing & Regulatory Committee (Committee) powers to revoke drivers' licences normally as a result of information received from the Police (3 in the last year) however, other decisions concerning drivers is decided by the Licensing & Regulatory Committee. There are approximately 15 hearings a year for new applications and renewals and 6 reviews of licences decided by the Committee.

**Other important meetings / working groups attended by Councillors**

66. Aside from the examples cited of Planning and Licensing, there are other boards and committees which necessitate councillor representation. These are summarised in Table 6.

Table 6 – Membership, frequency and typical duration of other important meetings

<b>Meeting</b>	<b>Members</b>	<b>Meetings</b>	<b>Typical duration</b>
Audit and Procurement Committee	12	4	2 Hours
Ethics Committee	4 (+ 2 reserve)	4	1.5 Hours
Appeals Panel (Community Services)	N/A	The City Council establishes Appeals Committees from time to time to hear cases, where there is a right of appeal, against decisions made by the City Council, for example, Social	As required

		Services Home Care Charges appeals.  It is anticipated that the majority of each meeting will be conducted in private with only the initial formalities at the start of the meeting being considered in public.	
Appointments Panel	N/A	Appointment Panels are established as and when required.	As required
Coventry Health and Well-being Board	5 (+1 by invitation) + other Council Officers and Local Partners	4	2 Hours

### External Partnerships

67. As previously stated, the Council has a strong relationship and involvement with the West Midlands Combined Authority. Details of their meetings are outlined in the table 7 below.

Table 7 – WMCA Meetings

Meeting	Members	Approximate Number of meetings per annum	Average length of meetings
West Midlands Combined Authority (Board)	2 (+2 subs)	1 x Monthly	2 hours
West Midlands Combined Authority Audit, Risk and Assurance Committee	1 (+1 sub)	Bi-monthly	2 hours
West Midlands Combined Authority Environment Board	1	Quarterly	2 hours
West Midlands Combined Authority Housing and Land Delivery Board	1	6	1½ hours
West Midlands Combined Authority Investment Board	1	Monthly	1-2 hours
West Midlands Combined Authority Overview and Scrutiny Committee	1 (+1 sub)	7	2 hours
West Midlands Combined Authority Strategic Economic Development Board	1	5	2 hours
West Midlands Combined Authority Transport Delivery Committee	2	Monthly	2 hours
West Midlands Combined Authority Transport Scrutiny Sub-Committee	1	Monthly	2 hours
West Midlands Combined Authority Wellbeing Board	1	5	2 hours

68. There are also a number of boards, groups and organisations in the City which Councillors serve on that operate or contribute to addressing inequalities as detailed in Table 8 below.

Table 8 – External boards, groups and organisations

Meeting	Members	Approximate Number of meetings per annum
Coventry Ambassadors Social Enterprise Board	1	As required
Coventry Law Centre	2	Monthly
Coventry Refugee and Migrant Centre Board	3 + 1 Observer	Monthly
Police & Crime Panel	2 + 2 subs	7
Citizen's Advice Bureau Management Board	1	Bi-monthly
Tansley Charity Trust	4	2

### ***Other organisations***

69. The Council has incorporated a group structure for all of its various wholly owned companies, the company portfolio for the City Council is diverse and varied from hotel and leisure to a materials recycling facility.
70. A governance framework sits around this company model which includes the creation of a shareholder committee as a subcommittee of Cabinet.
71. Whilst the Shareholder Committee will not have operational control over Companies, as all decisions regarding the day to day operation of each Company, its business developments and commercial opportunities, staff terms and conditions and the development and implementation of its internal procedures rest with the Directors of each Company, the Shareholder Committee does receive updates on the various companies performance and takes any Shareholder Decisions which are required in line with the company's articles of association. The Committee also acts as the relevant decision making body for joint venture arrangements that the City Council has entered into with partners.
72. The elected members sitting on the Shareholder Committee protect the Council's interests as shareholders and they require bespoke training to enable them to undertake these complex decision making roles. The activity of the Shareholder Committee is subject to scrutiny from elected members sitting on Scrutiny boards as well as those elected members who are appointed to the City Councils Audit Committee.

### **Community Involvement of Councillors**

73. As stated in the methodology, the responses to the Councillor Survey and Journal have provided the majority of data and evidence within this section.

### *Engagement with residents*

74. The LGBCE ask that submissions demonstrate how Councillors provide effective community leadership, and what support in turn the Council offers to assist Councillors in this role. The Councillor Survey highlights that councillors most prefer email engagement with electors. 100% of councillors listed email as a means of communication, this was followed by 94% using telephone and 87% using social media as a means of communication.
75. Over 80% of councillors mention community meetings and 75% face to face interaction at council offices and residents' homes.
76. The Councillor Journal (see Figures 5 and 7) highlights that the four councillors spent 38% of their cumulative time on community/ case work with the median respondent spending 10 hours that week. The majority of this time involved councillors interacting with residents by phone/email, on the street, or in community meetings.
77. In the Councillor Survey, communication through emails and telephone calls ranked the top most important method of engagement with electors. This was followed by social media and then newsletters. Respondents to the survey could also list other methods of engagement that they used, friends and families and door knocking were mentioned the most.

Table 9 - Proportion of weekly hours according to journal responses.

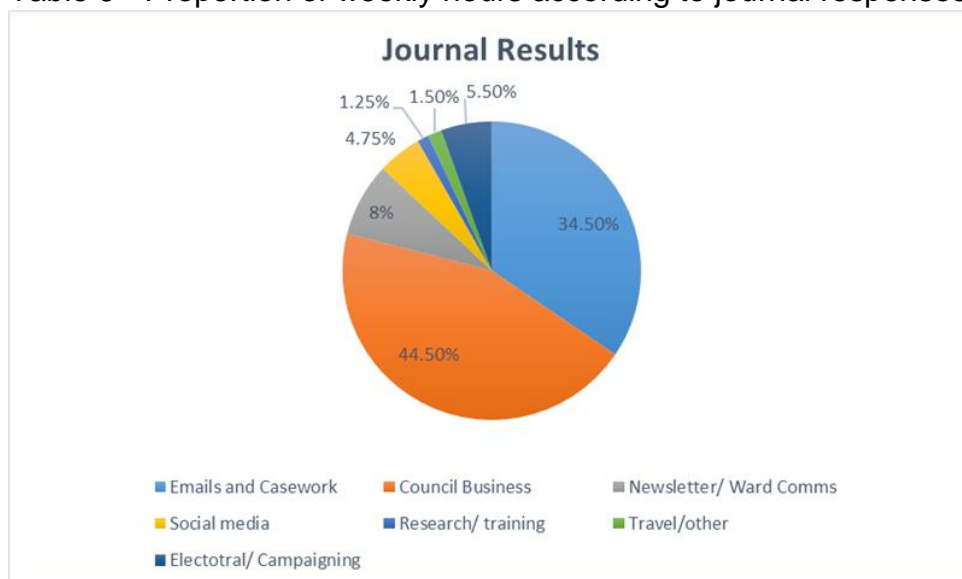


Table 10 - Total weekly hours spent on Council activities from Members' Survey

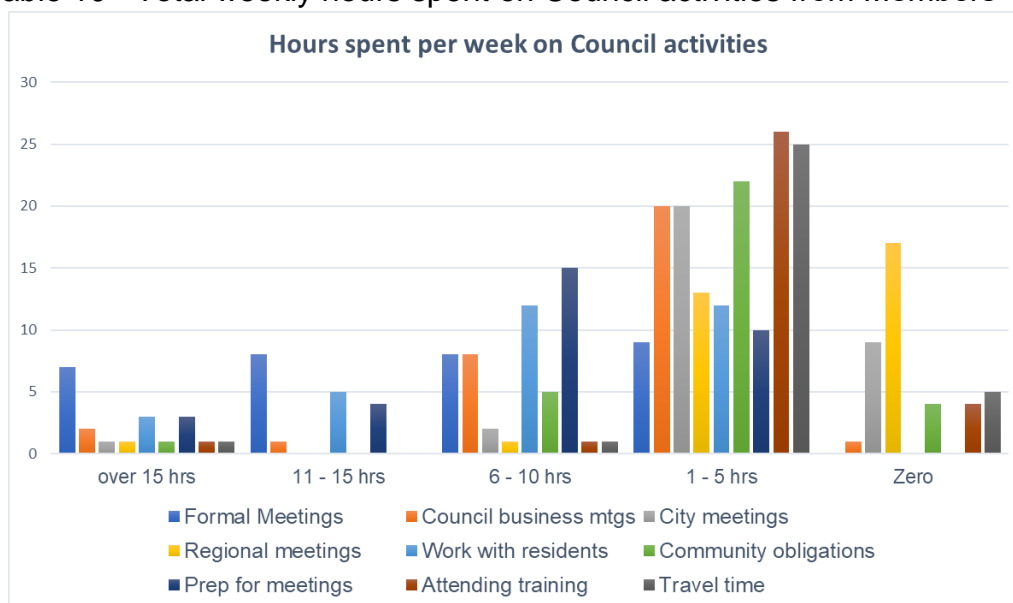


Table 11 - Total weekly hours worked by respondents in journal

Respondents	Total Weekly Hours
Councillor 1 -	28
Councillor 2 -	37.5
Councillor 3 -	27.75
Councillor 4 -	27.25
Median	30.25

### Support for Councillors

78. There are 19 (17.6 FTE) members of staff within Members Services supporting Members including the civic office.
79. A new and comprehensive Members' Training and Development Strategy is in its first year of implementation. The strategy provides a framework which includes a set of mandatory training, as well as both skills based and knowledge based supplementary training. Councillors are also able to access the corporate training offer.
80. The training programme responds to Councillors' training needs and has recently delivered personal safety training in response to increased concerns about intimidation and harassment, particularly with the increase in social media use by Councillors.
81. The Council also has a specific section of the intranet which provides information, guidance and quick links for Councillors to carry out their role, such as a casework support and performance data, but also supports their well-being, including access to occupational health services and what to do if they are experiencing abuse and intimidation. These pages are regularly updated to ensure information is current and up to date.

### Developing a place-based approach – One Coventry Delivered Locally

82. Coventry City Council is leading, through the One Coventry Partnership, a place-based approach with partners and communities to develop ideas for integration, stronger partnership working, and more effective use of collective resources. A

model is being designed through integrated community prototypes and other place-based partnerships, which focuses on improving outcomes and tackling inequalities. It supports the delivery of more preventative and better joined-up approaches to service delivery, across sectors and in collaboration with communities. Within the prototypes and locality approaches, organisations and services work creatively and closely together in local community settings, strengthening partnership approaches, and providing more immediate and wraparound support to residents.

83. The need to work differently to respond to the future needs of our communities, and the changing role of the council, is well recognised. Through a One Coventry approach, our partnership and communities work ensures that we are well placed to make the best use of our collective capacity and resource across the city. Elected Members understand and share the challenges and opportunities arising in their wards. This insight informs the community prototypes and place-based partnership approach, ensuring it is tailored to the needs of each locality. In addition, Elected Members play an important role in championing this work and are integral to ensuring the buy-in of local people and communities.
84. Community prototypes are enabling the One Coventry Partnership to develop collective creativity and resourcefulness, drawing upon lessons learnt from both the city's collaborative response to the COVID pandemic and wider research. The approach is also actively enabling a practical response to the current Cost of Living crisis, as outlined above.
85. The first community prototype commenced in 2021 in the Bell Green, Wood End and Henley locality, followed by a second prototype in 2022 in Canley and Tile Hill. Further place-based partnership approaches have also started in St Michael's and in Spon End, in collaboration with the local social housing association, Citizen Housing. Council officers are working with and in the heart of the community alongside cross-sector partners and residents to understand and collectively address priorities and to develop preventative and integrated approaches to improving resident outcomes. There is potential for and it is expected that Elected Members will play a more active role in guiding and delivering the work going forward. There has been strong commitment from all involved to try things out and improve ideas as the prototypes and place-based partnerships develop, informed by local need and feedback.
86. Development of the community prototypes and place-based partnerships is ongoing. Early evidence, which includes feedback and real-life stories, suggests that working in localities, is achieving positive outcomes. Partnerships have been strengthened through closer, more collaborative working in a way that is focused on resident outcomes. This work presents an exciting opportunity to make a real difference to the lives of local people.

#### **Determining the optimal council size – options appraisal**

87. There are three options available for the council size, increase the size, reduce it, or make no change from the present 54 councillor arrangement. The LG BCE state that they "have no pre-conceived views on the number of councillors necessary to run any particular local authority effectively, and we are content to accept proposals for an increase, decrease or retention of the existing number of



councillors, but only on the basis that they can be justified.” All three options were analysed by the project team in drafting of this report and are evaluated in turn.

### ***Option one - reducing the number of councillors***

88. The team analysed the argument for reducing the number of Councillors to two per ward.
89. Coventry has one councillor per 4,300 electors. Coventry’s statistical nearest neighbour group is made up of 16 similar local authorities and the councillor/elector ratio ranges from 1:2,051 to 1:4,730. Coventry has the fifth highest ratio in the group. Coventry’s ratio is higher than the other 6 West Midlands metropolitan authorities, with only Birmingham having a higher ratio. This indicates that if the number of Coventry councillors were to be reduced, the electoral inequality compared with other authorities would worsen.
90. 69% of Councillors feel they have adequate time to carry out their role, although it was recognised that with more time, more could be done. Of those who felt they had adequate time, comments included that this was only because they were retired, in part time employment, had a flexible employer or carried out the role full time.
91. One comment felt that the growing commitment and expectation means the role is becoming more like a job which “presents a real challenge to achieving diverse representation”. Reducing the number of councillors would further increase the challenge of promoting diversity and ensuring that the cohort of councillors is representative of the community.
92. Managing a work/life balance was also identified as a challenge and any reduction in numbers would increase the pressure on existing Members.

### ***Option two – increase the council size***

93. Despite the increasing workload and pressures on the role, responses to the survey did not identify an appetite to increase the council size. While a couple of respondents to the survey suggested that the number of councillors should be increased. One commented “For the size of population Coventry is under-represented by elected members” and just under a third said they did not have sufficient time to carry out their role, the majority of the comments were in support of Coventry retaining the same number of Councillors.
94. Measures are in place to support councillors as their roles change including the new training strategy and support from the Members Services Team.
95. An increase in the number of councillors is not identified to be necessary by the large majority of current councillors. Any increase in council size would also have a financial implication.

### ***Option three – maintain the current council size***

96. The majority of comments relating to Council size made in the survey were in support of Coventry retaining the same number of Councillors. “I think the current size is about right”. There was also some support for retaining an equal number of councillors in each ward. One respondent commented “If there is more than 1 Councillor with extra roles and responsibilities in a Ward, then they could be over-burdened with casework. In a large Authority there is a need for at least 3 elected Councillors to allow proper representation for constituents.”



97. 69% of Councillors feel they have adequate time to carry out their role, although it was recognised that with more time, more could be done. Of those who felt they had adequate time, comments included that this was only because they were retired, in part time employment, had a flexible employer or carried out the role full time. One comment felt that the growing commitment and expectation means the role is becoming more like a job which “presents a real challenge to achieving diverse representation”.
98. Any reduction in the number of councillors would make promoting diversity (including those in and outside employment and with other commitments) more challenging and would both disincentivise candidates in full time employment from applying and make it more difficult for councillors in full time employment to fulfil their duties.
99. Similarly, any reduction would also make maintaining a healthy worklife balance more challenging.
100. There was also a recognition of reliance on ward colleagues and that if the number of Councillors was reduced this would impact negatively on their ability to effectively carry out their role.
101. The total population of Coventry has grown 25% since the last boundary review in 2003 with the population of adults aged 18+ in Coventry (the base population from which the electorate is drawn) increasing by 29%.
102. The electorate figure used for the 2003 boundary review was 224,325, with a current electorate of 233,963 (2023) which has shown an increase of 9,638 (+ 4.3%). The anticipated growth from now until 2029, using ONS SNNPs is 15,286 (+7%).
103. In light of this anticipated increase which is greater than the previous review if there was reduction in councillors and/or ward numbers it is likely that this would be detrimental to the effectiveness of the local authority.
104. When asked whether the time being spent on council business has changed over recent years, over two thirds of respondents to the survey reported that they are spending more time. Reasons given include increasing demand and need and the use of social media. One respondent commented that while the latter provided opportunities to communicate more directly with residents “it has also created an expectation and additional workload”.

## **Conclusion**

105. The report has identified a range of evidence to be taken into account when determining the Council size and recommends option 3 to the LGBCE as the best way of meeting its aims for achieving a council size that allows the council to take decisions effectively, manage the business and responsibilities of the council successfully, and provide effective community leadership and representation.
106. Rising demand for services, challenging budget cuts, growing levels of casework, electorate growth and the increasing ease (via social media etc) that residents contact councillors means that any reduction in numbers would be detrimental.
107. Any reduction in the number of councillors would impact the residents of Coventry as it would undermine councillors’ ability to effectively represent their communities, carry out their executive roles and contribute to the growing regional agenda which has been highlighted in this submission.
108. Any reduction could also make it harder to attract councillors and impact negatively on diversity.

109. The rising population, the new place based approach intensifying councillors role in the community and the importance of Coventry making an effective regional contribution as one of the WMCA's constituent councils also need to be taken into account.
110. Arrangements are in place and continue to be developed to support councillors in their growing and changing roles including the training strategy and through Members Services.

## Appendix 2:

### Local Government Boundary Commission for England: Coventry City Council Electoral Forecast

#### Contents

Introduction
Whole local authority adult population and electorate projections
ONS population estimates compared with 2021 Census reported population numbers
Projecting the future electorate to 2029 for wards using additional housing forecast method
Projecting the future electorate to 2029 for polling districts using additional housing forecast method

#### Introduction

1. The Local Government Boundary Commission for England's (LGBCE) review of Coventry City Council started in October 2022.
2. As part of this process, local authorities are required to provide electoral forecasts up to 2029.
3. This report follows the "Electorate Forecasting – User Guide" document from the LGBCE.
4. Data sources used:

Source	Description
Office for National Statistics (ONS) (1)	Estimates of the population for the UK, England, Wales, Scotland and Northern Ireland Mid 2019 Estimates of the population for the UK, England, Wales, Scotland and Northern Ireland Mid 2020
ONS (2)	Ward-level population estimates (Experimental Statistics) Mid - 2019 and Mid - 2020
ONS (3)	Subnational population projections for England: 2018-based
ONS (4)	Census 2021
Coventry City Council (CCC) (5)	Electoral register canvas data 2018 – 2023 Electoral Services
CCC (6)	New Housing Development 2022 – 2031+: Planning Policy Department
Higher Education Statistics Agency (HESA) (7)	Registered student profiles

## Local authority electorate projections based on ONS population projections

5. The purpose of projecting the future electorate population using ONS population projections is to constrain, if needed, any projections based on new housing development plans.
6. Electorate numbers for the whole local authority have been projected to 2029 by using:
  - Elector to ONS adult (18+ years) mid-year population estimate (MYE) ratios by polling district determined from the last three years (Table 1) and then by
  - Applying ONS adult (18+ years) projected population estimates (PYE) (Table 2).

Table 1: Ratio Electors (5) to Estimated Adult Population (1 and 3)

Year	Adult Population Estimate	Local Government Electorate	Electors to Adult Population Ratio
2021	305,270	228,193	0.75
2022	308,816	229,459	0.74
2023	312,360	233,963	0.75

7. Based on data for 2021 – 2023, around 75% of the estimated adult population are registered to vote (a ratio of electorate to adult population of 0.75).

Table 2: Projected whole authority electors in 2029 (3)

Year	Multiplier Adult Population	Ratio Elector to Adult Population	Projected Total Electors	Projected Additional Electors
2029	1.07	0.75	249,249	15,286

8. Projected whole local authority registered electorate growth to 2029 (from 2023) is + 15,286.

## ONS population estimates compared with 2021 Census reported population numbers

9. The 2021 Census reported a total population estimate of 345,328, compared with an ONS PYE of 383,820 for 2021 (a shortfall of around 39,000) and an 18+ year population of 268,444 compared with an ONS PYE of 305,270 (a shortfall of around 37,000).
10. It is worth noting that 85% of the variance between the 2021 Census and ONS population estimates were for residents between 20 – 34 years of age.
11. It may also be worth noting that the 2021 Census was undertaken during lockdown and reported the population was drawn from 134,125 surveyed households, which is around 27,000 fewer addresses than was used in the annual electorate register canvas (160,847) in the same year.

12. There is also significant variation across wards. Tables 3a and 3b show the variance in households reported in the 2021 Census compared with households canvassed in 2021 (3a) and % profiles of household type and nationality of the registered electorate in the same year (3b).
13. The highest variances in household numbers were for St Michael's and Wainbody wards which have significantly large student populations. This variance is mainly due to the fact that on the electoral register each room is a property rather than the full Halls of residence being one property.
14. Coventry City Council, along with other councils with large student and migrant populations, are working currently with ONS colleagues to understand population variances and to improve methods for estimating population.
15. We estimate from HESA (7) and canvas data (5) that currently around 45K university students live in Coventry, with up to 30K eligible potentially to vote (around 10-15% of total registered electorate population).
16. Also of note is the 2021 Census reported that 82% of the surveyed population had at least one UK national identity (compared with 90% nationally) and 28% had been born outside the UK (compared with 18% nationally).

Table 3a: Variance in households canvassed in 2021 compared with households reported in the 2021 Census (4 and 5)

Ward	Households Census 2021	Canvassed 2021	Variance	% Variance
Bablake	6,990	7,259	-269	-4%
Binley and Willenhall	7,567	8,180	-613	-7%
Cheylesmore	6,840	7,451	-611	-8%
Earlsdon	6,199	6,734	-535	-8%
Foleshill	7,445	8,521	-1,076	-13%
Henley	8,579	9,331	-752	-8%
Holbrook	7,140	7,601	-461	-6%
Longford	8,244	8,884	-640	-7%
Lower Stoke	8,936	9,372	-436	-5%
Radford	7,892	8,423	-531	-6%
St Michael's	8,772	21,123	-12,351	-58%
Sherbourne	7,467	8,254	-787	-10%
Upper Stoke	7,724	8,334	-610	-7%
Wainbody	4,688	9,515	-4,827	-51%
Westwood	8,032	8,834	-802	-9%
Whoberley	6,863	7,398	-535	-7%
Woodlands	7,936	8,414	-478	-6%
Wyken	6,811	7,219	-408	-6%
<b>Coventry</b>	<b>134,125</b>	<b>160,847</b>	<b>-26,722</b>	<b>83%</b>

Table 3b: % Profile by household and nationality of registered electorate (5)

Ward	No class	Other (e.g.HMO)	University	British	Commonwealth	EU
Bablake	98%	2%	0%	93%	2%	5%
Binley and Willenhall	97%	3%	0%	85%	5%	10%
Cheylesmore	97%	3%	0%	85%	8%	7%
Earlsdon	94%	4%	2%	94%	2%	4%
Foleshill	97%	2%	1%	73%	12%	16%
Henley	98%	2%	0%	80%	7%	13%
Holbrook	99%	1%	0%	82%	6%	13%
Longford	98%	2%	0%	83%	6%	12%
Lower Stoke	98%	2%	1%	78%	8%	14%
Radford	97%	2%	1%	79%	7%	15%
St Michael's	44%	6%	50%	65%	18%	17%
Sherbourne	94%	4%	1%	87%	4%	9%
Upper Stoke	98%	2%	0%	78%	8%	14%
Wainbody	51%	2%	48%	95%	3%	2%
Westwood	93%	5%	2%	89%	4%	7%
Whoberley	96%	4%	0%	88%	4%	8%
Woodlands	100%	0%	0%	94%	2%	5%
Wyken	99%	1%	0%	89%	5%	6%
<b>Coventry</b>	<b>87%</b>	<b>3%</b>	<b>10%</b>	<b>84%</b>	<b>6%</b>	<b>10%</b>

### Projecting the future electorate to 2029 for polling districts using additional housing forecast method

16. The LGBCE guidance states the number of additional electors for smaller areas can be calculated as follows:

**Electorate per dwelling factor X New housing additions (up to 2029) X factor for vacant dwellings = Additional electors (2029)**

17. The projection for electors to 2029 can then be calculated as follows:

**Current electorate (2023 baseline) + Additional electors (2029)**

18. New housing forecast data sourced from the Planning Policy Department at Coventry City Council was used to project the electorate from a 2023 baseline to 2029 based on additional housing at polling district level.

19. The electorate per dwelling by polling district and ward has been estimated by using information from the annual electoral roll canvas (5). Table 4 sets out the computed electorate per dwelling by ward for the period 2017-2022 (minus/plus 95% confidence intervals).



Table 4: Ratio electorate: dwelling by ward 2017-2022 (-/+ 95% CI) (5)

Ward	Ratio 2017 - 2022	CI 95% lower	CI 95% Upper
Bablake	1.8	1.7	1.9
Binley and Willenhall	1.6	1.6	1.6
Cheylesmore	1.6	1.5	1.7
Earlsdon	1.8	1.7	1.9
Foleshill	1.6	1.5	1.6
Henley	1.6	1.5	1.6
Holbrook	1.8	1.7	1.8
Longford	1.6	1.5	1.7
Lower Stoke	1.7	1.6	1.7
Radford	1.6	1.5	1.6
<b>St Michael's</b>	<b>0.6</b>	<b>0.4</b>	<b>0.8</b>
Sherbourne	1.5	1.4	1.5
Upper Stoke	1.6	1.6	1.6
<b>Wainbody</b>	<b>1.1</b>	<b>0.9</b>	<b>1.2</b>
Westwood	1.6	1.4	1.7
Whoberley	1.6	1.5	1.7
Woodlands	1.6	1.6	1.7
Wyken	1.8	1.7	1.8
<b>Coventry</b>	<b>1.5</b>	<b>1.4</b>	<b>1.6</b>

20. The electorate per dwelling ratio computed was notably lower for St Michael's and Wainbody wards. Between them, they are estimated to account for more than 50% of students living in Coventry, who in turn, represent a significantly sizeable proportion of the adult population in these wards (estimated to be 52% and 33% respectively).
21. The projected electorate number to 2029 aggregated for the whole of Coventry using the new housing forecast method at polling district level is 245,658 compared with 249,249 using the ONS population projection method (Table 2). A shortfall of 3,591.
22. The projection from the new housing forecast reconciles with the Council's Local Plan (2011 – 2031), which has projected the need for a net 42,400 new homes to be built to meet projected population demand to 2031, with a target to build around 25,000 new homes in Coventry (60%), and for the remainder (40%) to be built out of Coventry through arrangements with neighbouring local authorities.
23. The projections account for 10,259 new homes planned to be built by 2029 but do not account for the 200+ estimated additional homes per year to be built on windfall sites.
24. Thus, projected electorate numbers by polling district and ward using the new housing forecast method have been adjusted for projections using the ONS population projection method (Table 2).
25. The results of the projected electorate numbers to 2029 using the new housing forecast method by polling district (Table 5) suggest:
  - Significant growth in projected electorate numbers to 2029, exceeding the 10% variance threshold against the average electorate numbers by ward for Bablake (+31%) and Westwood (+14%).

- Electorate numbers for both Henley and Lower Stoke being greater than the 10% variance threshold against the average electorates by ward both currently and projected to 2029 (+12% and +13% respectively).
- A shortfall in projected electorate numbers to 2029 exceeding the 10% variance threshold against the average electorates by ward for Cheylesmore (-12%) and for Sherbourne (-10%).
- A shortfall in current and projected electorate numbers to 2029 exceeding the 10% variance threshold against the average electorates by ward for Wainbody (-20%) and Whoberley (WH) (-15%).

Table 5: Electors and % variance in electorate numbers by ward against the average projected to 2029 (1, 3, 5 and 6)

Ward	Projected Electors to 2029	% Variance to Average Electors Per Ward
Bablake	18,130	31%
Binley and Willenhall	13,709	-1%
Cheylesmore	12,122	-12%
Earlsdon	12,748	-8%
Foleshill	14,077	2%
Henley	15,446	12%
Holbrook	14,656	6%
Longford	14,631	6%
Lower Stoke	15,810	14%
Radford	13,595	-2%
St Michael`s	13,023	-6%
Sherbourne	12,531	-10%
Upper Stoke	13,558	-2%
Wainbody	11,030	-20%
Westwood	15,818	14%
Whoberley	11,767	-15%
Woodlands	13,915	0%
Wyken	12,682	-8%



Coventry City Council

Council Report

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Council

21 March 2023

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources – Councillor R Brown

**Director Approving Submission of the report:**

Chief People Officer

**Ward(s) affected:**

None

**Title:**

Annual Pay Policy Statement 2023/24

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**Is this a key decision?**

No

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**Executive Summary:**

Local Authorities are required by sections 38 and 39 of the Localism Act 2011 to produce an annual Pay Policy Statement. The Statement must articulate the City Council's policies towards a range of issues relating to the pay of the workforce, particularly the most senior staff (or "chief officers") and the relationship of their pay to the lowest paid employees. The proposed annual Pay Policy Statement for 2023/24 is attached as Appendix 1.

**Recommendations:**

1. Council is recommended to approve the Annual Pay Policy Statement 2023/24 as attached at Appendix 1 to this report.

**List of Appendices included:**

Appendix 1 Annual Pay Policy Statement 2023/24  
Appendix 2 Local Government Pension Regulations Statement

**Other useful background papers:**

None

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

No

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

No

**Will this report go to Council?**

Yes – 21 March 2023

## **Report title: Annual Pay Policy Statement 2023/24**

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

- 1.1 The purpose of the Pay Policy Statement is to ensure transparency and accountability with regard to the Council's approach to setting pay. The Pay Policy Statement when approved by Council, is published on the Council's website in accordance with the requirements of the Localism Act 2011. The Policy Statement requires the Council to particularly highlight the relationship between the pay and remuneration of the most senior staff (Chief Officers) and the general workforce. The Council's statement of policy on the Local Government Pension Scheme (LGPS) Regulations 2013 is also attached at Appendix 2.
- 1.2 Guidance on the development of Pay Policy Statements states authorities should explain their policy in respect of Chief Officers who have been made redundant and later re-employed or engaged under a contract of service, and also their approach to any shared arrangements in place.
- 1.3 It is the City Council's policy is to not re-employ or re-engage previous employees within five years, if they have left as part of any voluntary redundancy/early retirement programme. It is not envisaged that any Chief Officer who leaves the Council with a severance or redundancy payment will be considered for further employment with Coventry or for the hiring of their services in another capacity save in exceptional circumstances.
- 1.4 There are not currently shared arrangements in place.

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

- 2.1 Council is recommended to approve the annual Pay Policy Statement for 2023/24 to ensure compliance with the Localism Act 2011.

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

- 3.1 There is no requirement to consult on the Pay Policy Statement.

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

- 4.1 The proposed Pay Policy Statement will be effective for the financial year 2023/24. Where actual earnings levels are referred to therein, these represent the latest figures available i.e. 2022/23.

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

#### **5.1 Financial Implications**

The costs associated with the implementation of the Pay Policy are built into the City Council's budget planning process. One-off costs arising from the termination of employment are met from specific reserves set aside for this purpose.

#### **5.2 Legal implications**

The agreement to and the publication of an Annual Pay Policy Statement is a requirement of sections 38 and 39 of the Localism Act, 2011.

## **6. Other implications**

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

To assist the effective delivery of key objectives and corporate priorities the City Council must ensure key principles provide the foundation for the determination of the pay and grading of employees.

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

By adopting a Pay Policy Statement as attached at Appendix 1 the City Council is compliant with the Localism Act 2011.

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

This document outlines the key principles for Coventry City Council's pay policy for 2023/24

### **6.4 Equalities / EIA**

As a consequence of the Equality Act and the National Joint Council (NJC) Conditions of Service the City Council is committed to equal pay principles and practice. The Council also publishes its Gender Pay Gap in accordance with statutory requirements

### **6.5 Implications for (or impact on) the environment**

None

### **6.6 Implications for partner organisations?**

None

### **Report author(s):**

**Name and job title: Susanna Newing - Chief People Officer**

**Tel and email contact: 024 7697 8216 [Susanna.Newing@coventry.gov.uk](mailto:Susanna.Newing@coventry.gov.uk)**

Enquiries should be directed to the above person.

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Amanda Durrant / Anna-Marie Taylor	Head of People & Business	HR & OD	9/3/23	13/3/23
Suzanne Bennett	Governance Services Co-ordinator	Law and Governance	9/3/23	9/3/23
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Susanna Newing	Chief People Officer	HR & OD	9/3/23	9/3/23
Barry Hastie	Interim Chief Executive (Section 151 Officer)	Finance	9/3/23	13/3/23
Julie Newman	Chief Officer Legal	Law and Governance	9/3/23	13/3/23
Members: Councillor R Brown	Cabinet Member for Strategic Finance and Resources	-	13/3/23	13/3/23

## Appendix 1

### Coventry City Council – Annual Pay Policy Statement 2023/24

#### 1. Introduction and Purpose

- 1.1 Under section 112 of the Local Government Act 1972, the Council has the power “to appoint officers on such reasonable terms and conditions as the authority thinks fit”. This Pay Policy Statement sets out the Council’s approach to setting the pay of its employees as required.
- 1.2 Coventry City Council is committed to operating consistent and equitable pay arrangements for all employees. The Pay Policy Statement is required to set out the Authority’s policies for the financial year relating to:
- The remuneration of its Chief Officers (this includes Chief Executive, Chief Officers , Directors and other Senior Managers)
  - The remuneration of its lowest paid employees
  - And the relationship between them
- 1.3 The Pay Policy Statement is required to state:
- The definition of ‘lowest paid employees’ for the purposes of this statement
  - The Authority’s reasons for adopting this definition
- 1.4 The Statement is also required to state the level and elements for each Chief Officer on the following:
- Remuneration on recruitment
  - Increases and additions to remuneration
  - The use of bonuses
  - The approach to payment on their ceasing to hold office under the authority or being employed by the authority
  - The publication of and access to information relating to their remuneration
- 1.5 It should be noted that the Pay Policy Statement does not include information relating to the pay of Teachers or Support Staff in schools who are outside the scope of the Localism Act.

#### 2. Current Pay Structure

- 2.1 The Council uses the National Joint Council (NJC) for Local Government Services Job Evaluation Scheme and the national pay spine as the basis for its local grading structure to determine the salaries of the vast majority of the non-school based workforce.
- 2.2 Progression within the grading structure is based on the payment of increments until the top of the grade is reached.
- 2.3 Any changes to the current grading structure during the year 2023/24 will be subject to approval of Council.
- 2.4 A similar incremental approach is also applied to other groups of employees who are governed by relevant national negotiating bodies, including the Soulbury Committee.
- 2.5 Increments for those centrally employed on teachers’ terms and conditions are based on performance in accordance with their national agreement.
- 2.6 Chief Officers and other senior managers’ posts are evaluated in accordance with the Local Government Job Evaluation Scheme for senior managers. Performance is reviewed on an annual basis and may result in the award of an increment within the respective grade.

- 2.7 The above policies apply except where the operation of the Transfer of Undertakings (Protection of Employment) Regulations, or other statutory provision, dictate otherwise.
- 2.8 Where a Chief Officer or senior managers is appointed under a 'contract for service' rather than as an employee, the Council's 'contracts for services' arrangements are in place to ensure that maximum value for money is secured. Currently, Coventry City Council does not currently employ any Chief Officers or senior managers under a contract for service but if this was the case, we would apply the 'contracts for services' arrangements.

### 3. Legal Context

- 3.1 This policy is in operation to ensure that Coventry City Council meets its obligations under relevant legislation including the Localism Act 2011.
- 3.2 With regard to the equal pay requirements contained within the Equality Act 2010, Part Time Employment (Prevention of Less Favourable Treatment) Regulations 2000 and Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002 and the Agency Workers Regulations 2010, the Council ensures there is no pay discrimination in its pay structures and that all pay differentials are objectively justified through the use of an equality-proofed job evaluation mechanism, which directly relates salaries to the requirements, demands and responsibilities of the role.
- 3.3 The Council also publishes its Gender Pay Gap annually.

### 4. Chief Officers Remuneration

- 4.1 For the purposes of this statement, Chief Officers' are defined within S43 of the Localism Act and by Section 2 of the Local Government and Housing Act 1989, as the Chief Executive, Chief Officers, Directors and Heads of Service.

#### 4.2 Chief Officers' Salaries

<u>Salary Grade</u>	<u>Salary Range</u>
<u>CX1</u>	£193,701 - £199,233
<u>D1/ D2</u>	£114,567 - £139,502
<u>AD1/AD2</u>	£87,183 - £112,610
<u>SM1/2/3</u>	£52,445 - £81,381

- 4.3 The Chief Executive's salary is £184,394.87 up to 28<sup>th</sup> February 2023
- 4.4 There are currently Acting up arrangements in place to cover the vacant Chief Executive role and two Chief Officers are in receipt of an honorarium payment during the period of recruitment for a new substantive Chief Executive.
- 4.5 The Chief Executive was also the Returning Officer for local elections held in Coventry in 2022. This is a separate appointment made in accordance with the Representation of the People Act 1983 and places a personal liability on the post holder. Therefore, a responsibility payment is made.

For Council elections, the Returning Officer fee is paid by the local authority of £7,500.

Total payment to the Chief Executive during 2022/23, including salary and Returning Officer fees was £191,894.87,

- 4.6 Chief Officer and senior manager remuneration currently falls within the range determined by the Council. These salary scales will be increased for 2023/24 in line with the relevant national pay award if made.

### 5. Recruitment of Chief Officers and senior managers

- 5.1 The determination of the remuneration offered to any newly appointed Chief Officer or senior



manager will be in accordance with the pay structure and relevant policies in place at the time of recruitment. The Council's policy and procedures with regard to the recruitment of Chief Officers or Senior Managers are set out within the Council's Constitution.

- 5.2 Chief Officers and senior manager jobs are allocated to a salary range in accordance with the job evaluation scheme.
- 5.3 Where the Council is unable to recruit to a post, it will consider the use of temporary market force supplements. Where the Council remains unable to recruit Chief Officers under an employment contract, or there is a need for interim cover for a Chief Officer or senior manager post, the Council will consider engaging individuals under 'contracts for service'.
- 5.4 The Council considers that decisions on salary level for a new post over £100,000 pa or any existing post regraded to over £100,000 pa should be subject to accountability and scrutiny. The Council considers that it would be preferable for scrutiny of these decisions to take place in Committee rather than by full Council, and that the Audit and Procurement Committee is the appropriate forum.

## **6. Increases and additions to Remuneration of Chief Officers or senior managers**

- 6.1 The Council does not award any bonuses to its Chief Officers or senior managers.
- 6.2 Incremental progression within salary scales for Chief Officers and senior managers is based upon an annual performance based assessment.
- 6.3 It is the Council's policy to pay temporary and reviewable 'market supplement' to Chief Officer or senior manager salary levels where there is clear and demonstrable evidence that the salary level otherwise attached to the post creates substantial recruitment or retention difficulties. In 2022/23 four Chief Officers or senior managers have received market supplements in addition to their basic salary, ranging from £3,850 to £14,870.
- 6.4 The gross fees paid to senior officers (other than the Returning Officer) covered in the pay policy for elections in 2022 totalled £10,335.80. The fees including those paid to the Returning Officer and senior staff for carrying out the responsibilities required to deliver these elections.
- 6.5 Additional allowances will only be paid to Chief Officers and senior managers where they undertake additional duties that fall outside their substantive role.
- 6.6 Eight Chief Officers or Senior Managers received payments of between £4,000 and £10,000 during 2022/23 for additional hours and work undertaken as Directors of Council-owned companies.

## **7. Payments on Termination**

- 7.1 The Council's approach to discretionary payments on termination of employment of Chief Officers or senior managers in a redundancy situation is set out within its Security of Employment Agreement. In accordance with the Local Government (Early Termination of Employment) (Discretionary Compensation) Regulations 2006, the Council has used its discretion to calculate redundancy payments in accordance with the Security of Employment Agreement.
- 7.2 The Council does not exercise the discretion available to grant 'added years' of service under the Local Government Pension Scheme.
- 7.3 The City Council will not re-employ or re-engage previous employees within five years, if they have left as part of any voluntary redundancy/early retirement programme. It is not envisaged that any Chief Officer who leaves the Council with a severance or redundancy payment will be considered for further employment with Coventry or for the hiring of their services in another capacity save in exceptional circumstances.

## **8. Publication**

8.1 Upon approval by the full Council, this Statement will be published on the Council's Website.

## **9. Lowest Paid Employees**

9.1 At present, the lowest paid employees of Coventry City Council are paid £10.50 per hour. This figure will be reviewed following announcement of the national pay award for 2023/24

9.2 The City Council employs a number of modern apprentices who are not included within the definition of "lowest paid employees" as they are employed under specific trainee contract terms. We also do not include trainees and interns within this definition.

9.3 The Code of Recommended Practice on Data Transparency recommends the publication of the ratio between the highest paid salary, the median average salary of the whole of the Council's workforce and the lowest salary level paid.

9.4 The current Council pay levels define the following rates of pay:-

- Chief Executive - £201,158
- Median employee - £29,439
- Lowest paid employee - £20,258

9.5 Thus, the current pay ratios are as :-

- Chief Executive to lowest paid employee = 9:93
- Chief Executive to median employee = 6:83

9.6 This pay ratio figure between the highest and the lowest paid employee is within the recommended upper limit of 1:20, which was suggested by Lord Hutton in his 'Review of Fair Pay in the Public Sector'.

## **10. Monitoring and Review**

10.1 Once approved by Full Council, the Pay Policy statement will come into effect and will be reviewed annually in accordance with the relevant legislation at the time.

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## **3. The Local Government Pension Scheme Regulations Statement of Policy**

• February 2022

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Under Regulation 60 of the Local Government Pension Scheme (LGPS) Regulations 2013 each employer must formulate, keep under review and publish their policies on certain discretions contained within the LGPS Regulations.

This Statement is applicable to all employees of Coventry City Council who are eligible to be members of the LGPS and, where applicable, deferred or pensioner members.

### **1. Regulation 30 – Members request for early payment of benefits**

#### **Explanation**

From age 55, members who leave or have left local government employment have the right to apply for early payment of their retirement benefits subject to the consent of their employer. However, members aged 60 and over do not need their employer's consent.

The pension benefits must be reduced in accordance with guidance provided by the Government actuary. Employers may determine on compassionate grounds that the benefits are not reduced.

#### **Coventry City Council's Policy**

- **Active Members (current employees) - The City Council will allow early retirements on the grounds of redundancy/efficiency of the service. This discretion will otherwise only be used in rare and exceptional circumstances.**

**It would need to be funded by a lump-sum contribution into the Pensions Fund by the City Council. Each specific request raised under this Regulation will be judged equally and fairly on its own merits.**

- **This discretion will be exercised by those officers nominated to approve existing severance packages.**
- **Deferred Members (Pre April 2014) – Early release of retirement benefits may be allowed in exceptional circumstances. The former employee must make an application in writing to the City Council. Each specific case will be judged equally and fairly on its own merits and where appropriate approved by the appropriate Cabinet Member.**
- **Waiver or reduction – Each specific case will be judged equally and fairly on its own merits and where appropriate approved by the appropriate Cabinet Member. Any cost would need to be funded by a lump-sum contribution into the Pension Fund by the City Council.**

**2. The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 Schedule 2 - The rule of 85 for members drawing benefits between age 55-59.**

**Explanation**

The rule of 85 applies to those members who joined the LGPS before 2006 and allows them to retire earlier than their normal pension age, taking their pension benefits in full. Under the LGPS 2014 Regulations members may lose some of the rule of 85 protections if they wish to access their benefits and they are aged 55-59. An employer may resolve to reinstate the protection which would have cost implications.

**Coventry City Council's Policy**

Each specific case will be considered on the grounds of efficiency of the service, having fully considered service delivery and financial costs.

**3. Regulation 31 – Award of Additional Pension of an active member**

**Explanation**

An employer may resolve to award a member additional pension of not more than £6,500 per year (as at 1<sup>st</sup> April 2014). An employer may make decisions on awarding additional pension for up to six months after termination of employment in cases of redundancy, in the interests of efficiency of the employing authority's functions or at the ending of a joint appointment because the other appointment holder has left.

**Coventry City Council's Policy**

**This discretion will not be exercised by the City Council in any circumstances.**

**4. Regulation 16(2)e & Regulation 16(4)d – Additional Pension Contribution (APC)**

**Explanation**

An employer may make either a regular or lump sum Additional Pension Contribution (APC) to a member's account. This may be part or whole funded.

**Coventry City Council's Policy**

**This discretion will not be exercised by the City Council in any circumstances.**

**5. Regulation 30(6) and Regulation 30 (8) – Flexible Retirement**

**Explanation**

A member who is aged 55 or over and with their employer's consent reduces their hours and/or grade can then, but only with the agreement of their employer, make a written application to the administering authority (West Midlands Pension Fund) for payment of all or part of their accrued benefits without having retired from that employment.

If payment of benefits occurs before normal retirement age the benefits can be actuarially reduced in accordance with guidance issued by the Government actuary.

The employer may choose to waive the reduction in whole or in part. If the employer chooses to do so, then the cost of waiving the reduction in whole or in part has to be paid to the Fund.

**Coventry City Council's Policy**

**Each specific case will be judged equally and fairly on its own merits, having fully considered service delivery and financial costs. The Council will normally only approve the payment of benefits where there is no additional cost to the Council.**

**6. Regulation 17 – Shared Cost AVC**

**Explanation**

Employers may resolve to establish and maintain a Shared Cost Additional Voluntary Contribution Scheme (SCAVC). Who can join, how much the employer and employee will jointly contribute and the type of benefits provided must be considered.

**Coventry City Council's Policy**

**Coventry City Council will allow a Shared Cost Additional Voluntary Contribution Scheme.**

**7. Regulation 16 – Optional contributions during absence**

**Explanation**

Employing authorities have the discretion to extend beyond 30 days the period where a member can make a written request to make contributions. These contributions will cover a period of absence where pension contributions would otherwise not have been made.

**Coventry City Council's Policy**

**Coventry City Council will extend the period of 30 days in rare and exceptional circumstances or where it was beyond the member's control.**

**8. Regulation 22 – Re-employed and rejoining deferred members**

**Explanation**

Where a deferred member becomes an active member again, before becoming entitled to the immediate payment of retirement benefits in respect of former membership(s), he/she may elect to have former membership(s) aggregated with their current active membership. An election must be made in writing to the member's appropriate administering authority (West Midlands Pension Fund) before the expiry of the period of 12 months, beginning with the date that the employee again became an active member (or any such longer period as the employer may allow).

**Coventry City Council's Policy**

**Coventry City Council will extend the period of 12 months in rare and exceptional circumstances or where it was beyond the member's control.**

**9. Regulation 100 – Inward transfers of pension rights**

**Explanation**

A person who becomes an active member who has relevant pension rights may request their fund authority to accept a transfer value for some or all of their former rights. An election must be made in writing before the expiry of the period of 12 months beginning with the date that he/she became an active member (or any such longer period as his employer may allow).

**Coventry City Council's Policy**

**Coventry City Council will extend the period of 12 months in rare and exceptional circumstances or where it was beyond the member's control.**

## **10. Regulation 9 (3) - Contributions payable by active members**

### **Explanation**

Employing Authorities must review the contribution band to which they assign members each April, employers can also review band levels during the year

### **Coventry City Council Policy**

An employee's contribution percentage will be determined each pay period (e.g. each month's pay) based on the following:

- a) The pensionable pay to be paid in the pay period will be multiplied by 12 to give an annual equivalent and the contribution rate for that pay period determined according to the relevant tables.
- b) Any lump sums or retrospective arrears payments covering more than one pay period would be excluded from the calculation.

Employees will be notified of their pension contribution percentage on their payslip each month.

Details of the contribution rates can be found on the West Midlands Pension Fund's website by following the link <http://www.wmpfonline.com/activemember>

Members of the pension scheme have the right to appeal the pension banding decision within 6 months of the change of contribution rate; in the first instance they should contact Employment Services so that the matter can be reconsidered.

If they are still dissatisfied with this decision they can make a written application to the specified person, appointed by Coventry City Council, to give a decision under dispute.

## **11. Regulation 91-95 Forfeiture of pension rights**

### **Explanation**

If a member is convicted of a relevant offence committed in connection with their employment the former Scheme employer may apply for a forfeiture certificate. A forfeiture certificate certifies that the offence was 'gravely injurious to the state' or is liable to lead to a 'serious loss of confidence in the public service'. Where issued the former Scheme employer may direct that the member's rights under the regulations are forfeited.

### **Coventry City Council Policy**

Coventry City Council will apply the provisions of regulations 91 to 95.

## **12. Regulation 7 – The Internal Dispute Resolution Procedure**

### **Explanation**

An Internal Dispute Resolution Procedure applies to active members of the LGPS and to others such as deferred and pensioner members, whose position may be affected by decisions taken by their former employer or LGPS administering authority.

Responsibility for determinations under the first stage of the procedure rests with a “specified person” appointed by the employer. The employer must specify the job title and address of the person to whom applications should be directed.

**Coventry City Council's Policy**

**The specified person is:**

**Chief People Officer  
Coventry City Council  
PO Box 15  
Earl Street  
COVENTRY  
CV1 5RR**

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## **Council Meeting**

21 March 2023

### **Booklet 1**

### Written Questions

1.	<p><b>QUESTION SUBMITTED BY: Cllr M Lapsa</b></p> <p><b>TO BE ANSWERED BY: Councillor AS Khan, Cabinet Member for Policing and Equalities</b></p>
<p><b>TEXT OF QUESTION:</b></p> <p>“At a meeting some time ago the deputy leader informed the chamber that he was looking at another permanent traveller site. He mentioned he was looking at various sites in Westwood as well as other wards. Please would the Deputy Leader supply the chamber with the list of possible sites that have been looked at in Westwood as well as other wards?”</p>	

2.	<p><b>QUESTION SUBMITTED BY: Cllr J Lepoidevin</b></p> <p><b>TO BE ANSWERED BY: Councillor P Seaman, Cabinet Member for Children and Young People</b></p>
<p><b>TEXT OF QUESTION:</b></p> <p>“Would the Cabinet Member agree with me that the supporting families grant of 10.86M for targeted early years work has led to positive outcomes for 1566 families?</p> <p>Would the Cabinet Member agree with me that the Start 4 Life funding of 4.1M will improve support for families between pregnancy and age 2? The Best Start Vision that is a critical focus on the first 1001 days will support preschool children and families?”</p>	

3.	<p><b>QUESTION SUBMITTED BY: Cllr J Lepoidevin</b></p> <p><b>TO BE ANSWERED BY: Councillor R Brown, Cabinet Member for Strategic Finance and Resources</b></p>
<p><b>TEXT OF QUESTION:</b></p> <p>“The 2019/20 accounts that have not been signed off by our auditor’s due to valuation issues. Could the cabinet member provide this council with details of significant discrepancies between the auditors and officers valuation of assets?”.</p>	

<b>4.</b>	<p><b>QUESTION SUBMITTED BY: Cllr P Male</b></p> <p><b>TO BE ANSWERED BY: Councillor J McNicholas, Lead Member, Birmingham International Airport Holdings Ltd</b></p>
<p><b>TEXT OF QUESTION:</b></p> <p>“Can the Council representative for Birmingham Airport confirm the details of pay increases received by the CEO in the period from the start of the pandemic to present?”.</p>	

<b>5.</b>	<p><b>QUESTION SUBMITTED BY: Cllr P Male</b></p> <p><b>TO BE ANSWERED BY: Councillor J O’Boyle, Cabinet Member for Jobs, Regeneration and Climate Change and Cllr Welsh, Cabinet Member for Housing and Communities</b></p>
<p><b>TEXT OF QUESTION:</b></p> <p>“Following comments made by the Cabinet Member, about the Priory Visitor Centre, at the last Full Council meeting, could the current status of the Centre be clarified?”</p>	

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

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