

Time and Date

2.00 pm on Tuesday, 13th February 2024

Place

Committee Room 3 - Council House, Coventry

Public business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 5 - 10)
 - (a) To agree the minutes from the meeting of Cabinet on 9th January 2024
 - (b) Matters arising
4. **Exclusion of Press and Public**

To consider whether to exclude the press and public for the item of private business for the reasons shown in the report.
5. **2023/24 Third Quarter Financial Monitoring Report (to December 2023)**
(Pages 11 - 42)

Report of the Chief Operating Officer (Section 151 Officer)
6. **Coventry One Strategic Plan and Education Capital Programme 2023 - 2027** (Pages 43 - 100)

Report of the Chief Partnerships Officer
7. **Local Development Scheme (LDS) Update** (Pages 101 - 118)

Report of the Director of Streetscene and Regulatory Services
8. **Smokefree Generation 2030 - Local Authority Funding Allocation**
(Pages 119 - 126)

Report of the Director of Public Health and Wellbeing

9. **Proposed Statutory Consultation of the Designation of a New HMO Licensing Scheme 2025-2030** (Pages 127 - 228)
Report of the Chief Legal Officer
10. **Business Energy Advice Service (BEAS)** (Pages 229 - 238)
Report of the Director of Business, Investment and Culture
11. **City Centre South Additional Grant Funding** (Pages 239 - 252)
Report of the Director of Property Services and Development Chief Operating Officer (Section 151 Officer)
12. **Outstanding Issues**
There are no outstanding issues
13. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Private business

14. **City Centre South Additional Grant Funding** (Pages 253 - 300)
Report of the Director of Property Services and Development Chief Operating Officer (Section 151 Officer)

(Listing Officer: A Hunt - email: adam.hunt@coventry.gov.uk)
15. **Any other items of private business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Julie Newman, Chief Legal Officer, Council House, Coventry

Monday, 5 February 2024

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

Membership

Cabinet Members:

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

Non-voting Deputy Cabinet Members:

Councillors P Akhtar, S Agboola, G Hayre, A Jobbar, G Lloyd and S Nazir

By invitation:

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

Public Access

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

Michelle Salmon**Governance Services****Email: michelle.salmon@coventry.gov.uk**

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Coventry City Council
Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 9 January 2024

Present:

Members:

Councillor G Duggins (Chair)

Councillor A S Khan (Deputy Chair)

Councillor L Bigham

Councillor R Brown

Councillor K Caan

Councillor P Hetherton

Councillor J O'Boyle

Councillor P Seaman

Councillor D Welsh

Non-Voting Deputy
Cabinet Members

Councillor S Agboola

Councillor P Akhtar

Councillor G Hayre

Councillor G Lloyd

Councillor S Nazir

Non-Voting Opposition
Members:

Councillor S Gray

Councillor P Male

Councillor G Ridley

Other Non-Voting
Members:

Councillor N Akhtar

Councillor R Lakha

Councillor C E Thomas

Employees (by Service Area):

Chief Executive

J Nugent (Chief Executive)

Education and Skills

K Nelson (Chief Partnerships Officer), S Kinsell

Finance

B Hastie (Chief Operating Officer (Section 151 Officer)),
P Baggott, T Pinks

Law and Governance

J Newman (Chief Legal Officer), S Bennett

Public Health and
Wellbeing

A Duggal (Director of Public Health and Wellbeing)

Apologies: Councillor L Harvard
Councillor A Jobbar
Councillor K Sandhu

Public Business

55. Declarations of Interest

There were no disclosable pecuniary interests.

56. Minutes

The Minutes of the meeting held on 12 December 2023 were agreed as a true record.

There were no matters arising.

57. The 2024/25 Council Tax Base Report

Cabinet considered a report of the Chief Operating Officer which sought approval to establish the 2024/25 Council Tax base for tax setting purposes.

The report indicated that the Council Tax base is the measure of the taxable capacity of an area, for the purpose of calculating an authority's Council Tax. It represents the estimated number of Band D equivalent chargeable dwellings for the year. It also takes into account the authority's estimated Council Tax collection rate.

The report did not set the actual level of Council Tax in Coventry; that will be set by Council on the 20 February 2024.

Appendices to the report provided: the Tax Base Calculation for 2024/25 Tax Setting (Coventry); the Tax Base Calculation for 2024/25 Tax Setting (Allesley); the Tax Base Calculation for 2024/25 Tax Setting (Finham); the Tax Base Calculation for 2024/25 Tax Setting (Keresley); and Grant payments to Parish Councils.

RESOLVED that Cabinet:-

- 1) Approves that the Council Tax collection rate for 2024/25 be set at 97.9%**
- 2) That, in accordance with the Local Authorities (Calculation of Tax Base) Regulations 2012, the amounts calculated by the City Council for 2024/25 shall be:**

A net tax base of 87,734.0 for the whole of the City Council area made up as follows:

Allesley Parish	403.7
Finham Parish	1,564.8
Keresley Parish	561.8
All Other Coventry City Council Wards	85,203.7
TOTAL	85,734.0

- 3) That the following grant payments should be made to Parish Councils to reflect the impact in 2024/25 of Council Tax reductions on their tax bases:-

Allesley Parish	£2,065
Finham Parish	£2,768
Keresley Parish	£2,075
TOTAL	£6,908

58. Outcomes of the Fair Funding Consultation 2024-25

Cabinet considered a report of the Director of Education and Skills which set out the results of the consultation on proposed changes to the Fair Funding Scheme of Delegation ("the Scheme") and sought approval for recommended changes to the Scheme and the Fair Funding Formula.

The report indicated that Under Section 48 of the School Standards and Framework Act 1998, Local Authorities (LAs) are required to have schemes of delegation which set out the financial controls and arrangements that will operate between schools and the LA. Any proposed revisions to these schemes and/or the Fair Funding Formula must be the subject of consultation and require approval by the Schools Forum.

The Department for Education (DFE) introduced its National Funding Formula (NFF) for LAs in 2018-19, whereby allocations for LAs were determined under the NFF approach, but LAs retained control over how they chose to distribute that funding amongst their schools. In Coventry the decision since 2018-19 has been to mirror the NFF allocation for schools as far as possible. This has provided all schools with annual increases at least in line with the maximum per pupil funding increase set out in the NFF.

The (DFE) published the "Schools Operational Guide: 2024 to 2025" which sets out the school revenue funding arrangements for 2024-25. There have not been any significant changes required to the operation of the local school funding formula for 2024-25 compared to 2023-24.

The Coventry Fair Funding Consultation document was circulated on the 8th November 2023 to Head Teachers including Academy Head Teachers/Principals, Chairs of Governing Bodies, relevant Councillors, Trade Unions, Diocesan authorities, the Coventry Governors Association, members of the Schools Forum and Early Years Free Entitlement providers in the private, voluntary and Independent (PVI) sectors. The consultation period ended after 3 weeks on 29th November 2023.

Stakeholder groups were briefed throughout the consultation period. These included Primary Finance representative head teachers and the Schools Forum. The consultation document also seeks to act as an information document to school stakeholders regarding anticipated local budget pressures.

The recommended changes to the Fair Funding Formula and Fair Funding Scheme of Delegation were summarised in Section 2 of the report. The results of the consultation were set out in Appendix 1 to the report - Fair Funding Consultation 2024-25: Summary of Responses, Appendix 2 gave details of the De-delegation Levels Approved for 2023-24, and Appendix 3 to the report provided the Fair Funding Consultation document for 2024-25.

RESOLVED that Cabinet:

- 1) Approves the recommended changes to the Fair Funding Formula and Fair Funding Scheme of Delegation, which are summarised in Section 2 of the report.**
- 2) Delegates authority to the Director of Education and Skills, following consultation with the Cabinet Member for Education and Skills, to make any necessary amendments to the final detail of these recommended changes, in order to comply with the School Finance (England) Regulations once full detail of the schools funding settlement has been published by the Department for Education for 2024/25. Any changes will be made following discussion with the Schools Forum as appropriate.**

59. One Coventry Plan Annual Performance Report 2022-23

Cabinet considered a report of the Chief Partnerships Officer which indicated that the One Coventry Plan includes the Council's vision and priorities, new ways of working, and core areas of activity to deliver the plans objectives, key strategies, and approaches. The current plan, last refreshed in 2022, covers the period from 2022-2030. It builds on the Council's long-standing principles (being globally connected, locally committed, and working together to deliver priorities with fewer resources) and continues to set out new ways of working to help the Council face the current challenges of increasing demand and reduced real terms funding.

The annual performance report sets out the progress made towards the One Coventry Plan. For each objective, this report sets out the trends, actions taken, and performance metrics, to provide an assessment of the progress made against previous years and other places.

The Council uses agreed indicators to show progress made towards its priorities. This is supported by a wider basket of measures such as equality and perception measures that help explain the trends and story behind the headlines. Indicators are selected from key strategies and aligned to directorate priorities and equality and health inequalities objectives.

The Council's priorities are delivered through strategies aligned to the One Coventry Plan; as set out in the performance management framework. As part of

the performance management process, leadership teams within each directorate and the Corporate Leadership Team have been involved in ensuring that the organisation's key strategies are aligned to the One Coventry Plan.

The One Coventry Plan is currently measured using 73 indicators, of which 36 indicators improved; 6 stayed the same; 15 indicators got worse; can't say for 1 indicators; and progress is not available for the remaining 15 indicators. This means, 74% (42/57) of directional indicators (excluding cannot say or not available) improved or stayed the same. This compares to the performance seen in previous years: 69% (40/58) in 2021-22; 79% (50/63) in 2019/20, 78% (52/67) in 2018/19, 71% (42/59) in 2017/18, and 75% (43/57) in 2016/17.

Many of the Council's key priorities have an equality dimension or address an inequality caused by economic or social circumstances.

The Cabinet also considered a Briefing Note which outlined Scrutiny Co-ordination Committee's detailed consideration of the report at their meeting on 20th December 2023 (their Minute 39/23 refers). The Committee had:

- 1) Recommended that Cabinet agree the recommendations in the report.
- 2) Noted the Council's performance as set out in the performance report.
- 3) Noted that, where targets had not been achieved, those issues would be referred to the appropriate Scrutiny Board for further consideration.
- 4) Welcomed the intention to refresh the content and regularity of the suite of performance reports available in future.

Cabinet also noted that a Seminar for all Members on the Performance Report would be held in the near future.

RESOLVED that Cabinet:

- 1) **Notes the comments/issues made by Scrutiny Co-ordination Committee.**
- 2) **Approves the Performance Report.**
- 3) **Notes the intention to refresh the content and regularity of the suite of performance reports available in future.**

60. **Outstanding Issues**

There were no outstanding issues.

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

There were no other items of urgent public business.

(Meeting closed at 2.15pm)

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Public report Cabinet

Cabinet
Audit and Procurement Committee

13th February 2024
18th March 2024

Name of Cabinet Member:

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

Director Approving Submission of the report:

Chief Operating Officer (Section 151 Officer)

Ward(s) affected:

City wide

Title:

2023/24 Third Quarter Financial Monitoring Report (to December 2023)

Is this a key decision?

No

Executive Summary:

The purpose of this report is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and the Council's treasury management activity as at the end of December 2023. The net revenue forecast position after management action is a net overspend of **£8.5m**. At the same point in 2022/23 the projected overspend was £8.5m.

It should be recognised that the position above includes several largely one-off actions that have already been taken to reduce the overspend, which means that the underlying position is significantly higher than has been experienced in recent years. The Council has implemented a range of measures since quarter 1, to manage down the overspend to a less severe level. This included:

- Recruitment controls
- Discretionary spending controls
- Alternative funding opportunities

The Council continues to face budget pressure within both Adults and Children's social care, Housing, and Streetscene services. Other smaller but still significant overspends are also being reported in Transportation and Highways, and Business Investment and Culture. Financial pressures are being caused by a combination of continuing high levels of inflation, increased service demands, difficult conditions within social care markets and recruitment difficulties in some services.

During the year a number of councils with social care responsibilities have reported large in-year budgetary difficulties and it is clear that there are systemic problems for the whole sector which represent a serious threat to its financial sustainability.

The Council's capital spending is projected to be £127.6m and includes major schemes progressing across the city. The size of the programme and the nature of the projects within it continue to be fundamental to the Council's role within the city. Inflationary pressures are also affecting capital projects. The assumption is that stand-alone projects that are already in-progress will be delivered as planned but that future projects that have not yet started may need to be re-evaluated to determine their deliverability within previously defined financial budgets.

The materiality of the emerging financial pressures, both revenue and capital, has renewed the imperative to maintain strict financial discipline and re-evaluate the Council's medium-term financial position. This is reflected in the Pre-Budget report which is currently out for consultation.

Recommendations:

Cabinet is requested to:

- 1) Approve the Council's Third Quarter revenue monitoring position.
- 2) Approve the revised forecast capital outturn position for the year of £127.6m incorporating £9.6m net increase in spending relating to approved/technical changes and £11.7m of net rescheduling of expenditure into future years.

Audit and Procurement Committee is requested to:

- 1) Consider the proposals in the report and forward any recommendations to the Cabinet.

List of Appendices included:

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

Background papers:

None

Other useful documents

None

Has it been or will it be considered by Scrutiny?

No

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

Yes - Audit and Procurement Committee, 18th March 2024

Will this report go to Council?

No

Report title:

2023/24 Third Quarter Financial Monitoring Report (to December 2023)

1. Context (or background)

- 1.1 Cabinet approved the City Council's revenue budget of £260.5m on 21st February 2023 and a Capital Programme of £159.2m. This is the Third Quarterly monitoring report for 2023/24. The purpose is to advise Cabinet of the forecast outturn position for revenue and capital expenditure, recommending any action required, and also to report on the Council's treasury management activity.
- 1.2 The current 2023/24 revenue forecast is for net expenditure to be **£8.5m over budget** (after management action). The reported forecast at the same point in 2022/23 was an overspend of £8.5m which led to a deficit outturn of £6.7m and the use of reserves at year end to balance the position. Capital spend is projected to be £127.6m.
- 1.3 It is not unusual for the revenue position to reflect a forecast overspend at this stage which then improves over the remainder of the year. However, this is a significantly high figure by historical standards, and it should be recognised that the position above includes several largely one-off actions that have already been taken to reduce the overspend, which means that the **underlying position is significantly** higher than the £8.5m forecast. The Council has implemented a range of measures since quarter 1, in order to manage down the overspend to a less severe level. The overspend is caused largely by factors external to the Council and which can be expected to be ongoing, affecting future years' financial positions if the actions approved are not successful.
- 1.4 Following on from the £6.7m reported at 2022/23 outturn this indicates a serious financial trend for the Council which is not sustainable over the long-term. Section 2 of the report provides further detail on the revenue position and Section 5 sets out the Council's proposed approach to managing the position.
- 1.5 As a final backstop it should be noted that the Council maintains a strong balance sheet, in-part to protect itself from circumstances such as this, although it should be re-iterated that reserves are a finite resource and should only be applied sparingly to mitigate ongoing revenue overspends, and once a medium-term solution is in place.

2. Options considered and recommended proposal.

- 2.1 This is a budget monitoring report and as such there are no options.

Table 1 Revenue Position - The revenue forecast position is analysed by service area below.

Total Over / (Under) spend at Q2	Service Area	Revised Net Budget	Total Forecast Spend	Total Over/ (Under) Spend at Q3
£m		£m	£m	£m
6.0	Adult Services & Housing	115.4	121.1	5.7
1.2	Business Investment & Culture	8.3	9.5	1.2
4.2	Children & Young People's Services	95.0	98.9	3.9
(2.0)	Contingency & Central Budgets	(35.2)	(39.3)	(4.1)
(0.7)	Education and Skills	20.3	19.0	(1.3)
0.4	Finance & Corporate Services	9.7	10.5	0.9
0.0	Human Resources	1.4	1.5	0.1
0.2	Legal & Governance Services	8.2	8.3	0.1
0.2	People Directorate Management	0.9	1.2	0.2
0.1	Project Management & Property Services	(8.4)	(8.5)	(0.1)
(1.3)	Public Health	1.0	(0.3)	(1.3)
2.4	Streetscene & Regulatory Services	33.3	35.6	2.2
0.8	Transportation & Highways	10.6	11.6	1.0
11.5	Total	260.5	269.0	8.5

- 2.2 An explanation of the major forecast variances is provided below, the vast majority of which are of an ongoing nature if urgent action is not taken. Further details are provided in Appendix 1 to the report.

Directorate

Adult Services and Housing (£5.7m overspend)

Within Adult Services & Housing the largest element of overspend relates to Adult Social Care (£4.1M) which is due to an increase in the total number of packages of care, as well as increased activity across existing service users resulting in higher average costs. The increased activity reflects the complexity of the casework and the higher needs of those seeking our support with greater spend incurred in home care hours and supported living across adult services.

The other significant variance is an overspend on Housing & Homelessness (£2.2m) due to a greater than 40% increase in the number of people seeking assistance and being placed in temporary accommodation. During quarter 3 this upward trend has slowed over the final 2 months. Alongside this there has been a 15% increase in temporary accommodation fees which is required to ensure temporary accommodation continues to be available and mitigate the use of more expensive Bed and Breakfast accommodation.

Children's and Young People Services (£3.9m overspend)

£4.0m of the gross overspend relates to the cost of looked after children's placements. This overspend is caused by a lack of sufficiency in the market to meet the needs of young people in care which has significantly increased the average unit cost of those placements. There is a further overspend of £0.9m against staffing in Help and Protection due to high levels of cases requiring additional workers and agency staff. This is being offset by short

term one-off savings across the directorate from additional grants, and the use of earmarked reserves.

Streetscene & Regulatory Services (£2.2m overspend)

The Streetscene and Regulatory Service has seen a small, improved position leaving an overall forecast pressure of £2.2m. This is an accumulation of gate fees at the Waste to Energy Plant & additional vehicle safety costs to meet safety standards. The lingering impact of COVID influencing the number of major planning applications, and cost of agency staff to cover overtime and vacancies continues to create a pressure for the service.

Business Investment & Culture (£1.2m overspend)

There is no material change in this area since the quarter 2 position. The majority of the overspend (£0.8m) relates to one-off holding costs for the Cultural Gateway building, sponsorship income, Godiva Festival and St Marys income shortfall.

Transport & Highways (£1m overspend)

This overspend is made up of the current planned cost of addressing the backlog in highways defects and pressure with recruitment (£0.7m). As well as the PFI energy costs increase covering the high usage Winter period (£0.7m). There are income pressures in Bus Lane and Parking Enforcement attributed to temporary bus gates closures, however the enforcement at Hales Street and the Burges/Trinity Street cameras has seen £500k improvement in the income projections since quarter two. These pressures are being offset by savings (£0.9m) generated by foregoing expenditure and utilising grant for scheme development costs as well as increased income from higher car park usage.

Education & Skills (£1.3m underspend)

£0.65m of underspend relates to Customer Services which is due to the management of a significant number of vacancies to facilitate structural change and support improved long term service delivery via Coventry Connects. There is also a smaller underspend on Transformation Programme Office (£0.25m) which is a result releasing some one-off reserve funding and an on-going review of activity. This is being offset by an underspend of £0.3m in Education Entitlement which is as a result of reduced expenditure on school bus passes and efficiencies in the Virtual School due to staff vacancies and additional grant income.

Public Health (£1.3m underspend)

Underspends in both Public Health and Migration are due to the use of some one-off reserve funding as well as using additional grants to support costs.

Corporate

Contingency and Central (£4.1m Underspend)

There is a forecast overspend for pay inflation contingencies (£1.6m) reflecting the final agreed local government employers' pay award. This is more than offset by favourable variances for other contingency budgets (£1.7m), anticipated controls to reduce discretionary expenditure (£1m), a delayed need to replace DSG funded education expenditure (£0.6m) and other minor underspends.

2.3 Capital

The 2023/24 quarter 3 capital outturn forecast is £127.6m compared with the second quarterly outturn of £129.7m. Table 3 below updates the budget at quarter 3 to take account of £9.6m of new approved/technical changes and £11.7m of rescheduling now planned to be carried forward into future years.

The resources available section of Table 3 explains how the Capital Programme will be funded in 2023/24. It shows 79.6% of the programme is funded by external grant monies, whilst 11.1% is funded from borrowing. The programme also includes funding from capital receipts of £11.4m.

Table 3 – Movement in the Capital Budget

CAPITAL BUDGET 2023/24 MOVEMENT	Qtr 3 Reporting £m
Revised Programme (Reported at Q2)	129.7
Approved / Technical Changes (see Appendix 2)	9.6
“Net” Rescheduling into future years (See Appendix 3)	(11.7)
Revised Estimated Outturn 2023-24	127.6

RESOURCES AVAILABLE:	Qtr 3 Reporting £m
Prudential Borrowing (Specific & Gap Funding)	14.2
Grants and Contributions	101.6
Capital Receipts	11.4
Revenue Contributions and Capital Reserve	0.4
Total Resources Available	127.6

The inflationary pressures affecting the Council’s revenue budget are also present within capital schemes although the pattern with which this takes effect can be different due to the way in which expenditure is incurred. It is likely that most stand-alone projects that are already in-progress will be delivered within existing agreed contractual sums. However, some future projects that have not yet started may need to be re-evaluated to determine their deliverability within previously defined financial budgets. In addition, where budgets have established to deliver programmes of expenditure, it is likely that these programmes will need to be reduced in size over time reflecting higher prices.

2.4 Treasury Management

Interest Rates

Inflation remains the key driver for setting interest rates with headline Consumer Price Index running at 4% in December – a slight increase on the previous month. The Bank of England’s Monetary Policy Committee has maintained the Bank Rate at 5.25% despite some of its members voting for a further increase of 0.25%. Further rises in Bank Rate are now unlikely given the reducing trend in headline CPI and wider economic weakness. Arlingclose, the authority’s treasury advisor, predict that Bank Rate will remain at 5.25% for some time. Rates may begin to fall in the mid to late part of 2024.

Long Term (Capital) Borrowing

The Council's long-term borrowing requirement for the Capital Programme is forecast to fall by £0.7m in 2023/24, taking into account borrowing set out in Section 2.3 above (total £14.2m), less amounts to be set aside to repay debt, including non PFI related Minimum Revenue Provision (£14.9m). In the current interest rate climate, the Council has no immediate plans to take any further new long-term borrowing although this will continue to be kept under review.

The Public Works Loan Board (PWLB) remains the main source of loan finance for funding local authority capital investment. In August 2021 HM Treasury significantly revised guidance for the PWLB lending facility with more details and 12 examples of permitted and prohibited use of PWLB loans. Authorities that are purchasing or intending to purchase investment assets primarily for yield will not be able to access the PWLB except to refinance existing loans or externalise internal borrowing. Under the Treasury Management Strategy 2022/23 approved by Cabinet in February 2022 it was agreed the Council will not purchase investment assets primarily for yield.

Interest rates for local authority borrowing from the Public Works Loans Board (PWLB) between 2nd of October and 29th of December 2023 have varied within the following ranges:

PWLB Loan Duration (maturity loan)	Minimum 2023/24 to Q3	Maximum 2023/24 to Q3	As at the End of Q3
5 year	4.33%	5.69%	4.39%
50 year	4.72%	5.94%	4.88%

The PWLB allows qualifying authorities, including the City Council, to borrow at 0.2% below the standard rates set out above. This "certainty rate" initiative provides a small reduction in the cost of future borrowing.

Regular monitoring continues to ensure identification of any opportunities to reschedule debt by early repayment of more expensive existing loans replaced with less expensive new loans. The premiums payable on early redemption usually outweigh any potential savings.

Short Term (Temporary) Borrowing and Investments

The Council's Treasury Management Team acts daily to manage the City Council's day-to-day cash-flow, by borrowing or investing for short periods. By holding short term investments, such as money in call accounts, authorities help ensure that they have an adequate source of liquid funds.

Returns provided by the Council's short-term investments again yielded an average interest rate of 5.36% over the last quarter. This rate of return reflects low risk investments for short to medium durations with UK banks, Money Market Funds and other Local Authorities.

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

	As at 30th September 2023	As at 29th December 2023
	£m	£m
Banks and Building Societies	0.0	0.0
Local Authorities	33.0	11.0
Money Market Funds	28.08	31.03
Corporate Bonds	0.0	0.0
HM Treasury	0.0	0.0
Total	61.08	42.03

External Investments

In addition to the above in-house investments, a mix of Collective Investment Schemes or “pooled funds” is used, where investment is in the form of sterling fund units and not specific individual investments with financial institutions or organisations. The pooled funds are generally AAA rated; are highly liquid, as cash can be withdrawn within two to four days; and have a short average duration. These investments include Certificates of Deposit, Commercial Paper, Corporate Bonds, Floating Rate Notes, Call Account Deposits, Property and Equities. However, they are designed to be held for longer durations allowing any short-term fluctuations in return due to volatility to be smoothed out. In order to manage risk these investments are spread across several funds (CCLA, Schroders, Ninety-One Investec, Columbia Threadneedle and M&G Investments).

Returns provided by the Council’s pooled funds yielded an average of 5.10% over the last 12 months. At 31st December 2023, the pooled funds were valued at £27.3m (£26.9m at 30 September 2023), against an original investment of £30m (a deficit of £2.7m). All seven pooled funds show a deficit, mainly because of dropping property prices and volatility in bonds and equities. Six of the seven funds made a significant increase in their capital value in the last quarter. The outlier being the property fund which decreased further in capital value although it is hoped that values should begin to increase in 2024. There remains an expectation that the full value for each pooled fund will be recovered over the medium term - the period over which this type of investment should always be managed. Current accounting rules allow any ‘losses’ to be held on the Council’s balance sheet and not counted as a revenue loss. This override was due to change in April 2023 but a further extension to 31st March 2025 has been granted by the government. These investments will continue to be monitored closely and are likely to be redeemed when they reach par value.

Prudential Indicators and the Prudential Code

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

The indicators, together with the relevant figures as at 31 December 2023 are included in **Appendix 4** to the report. This highlights that the City Council's activities are within the amounts set as Performance Indicators for 2023/24. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 31st December 2023 the value is -£68.8m (minus) compared to +£96.2m within the Treasury Management Strategy, reflecting the fact that the Council has more variable rate investments than variable rate borrowings at the current time.
- The Upper Limit on Fixed Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at fixed interest rates. At 31st December 2023 the value is £245.7m compared to £480.9m within the Treasury Management Strategy, reflecting both the level of actual borrowing and that a significant proportion of the Council's investment balance is at a fixed interest rate.

2.5 Commercial Investment Strategy – Loans and Shares

The Council's Commercial Investment strategy is designed to ensure there are strong risk management arrangements and that the level of commercial investments held in the form of shares, commercial property and loans to external organisations, is proportionate to the size of the Council. In doing this the strategy includes specific limits for the total cumulative investment through loans and shares. The total combined limit for 2023/24 is £146m, against which there are £110m of existing commitments: -

	Limit	Actual 31st March 2023	2023/24 Committed and Planned	Total	Headroom
	£m	£m	£m	£m	£m
Shares	55.0	52.1	0.0	52.1	2.9
Loans	91.0	53.8	4.1	57.9	33.1
	146.0	105.9	4.1	110.0	36.0

The committed or planned total of £4.1m includes a number of loan facilities to lend which may not necessarily be taken up, although the Council is committed to provide the funds if requested.

3. Results of consultation undertaken

3.1 None

4. Timetable for implementing this decision.

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

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

5.1 Financial implications

Revenue

The net quarter 3 forecast continues to reflect an extremely serious and concerning position for the Council although this has improved marginally from quarter 2. The net forecast, after significant management action is a **£8.5m revenue overspend** and incorporates a range of intractable ongoing issues and the continuation of inflationary pressures which will have an impact beyond the current financial year.

At this stage of the monitoring cycle, it is expected that the Council will not be able to balance its revenue position by year-end without the use of reserve contributions. This in-year pressure contributes the 2024/25 budget gap as set out in the Pre-Budget Report. The improvement in the 2023/24 forecast since quarter 2 does not change the 2024/25 pre-budget position.

These circumstances are common to councils across the country with instances of financial stress being widely reported. Alongside authorities that have already been in difficult financial circumstances due to a variety of largely local reasons, 2023 has seen an increasing number of councils give dire warnings about their ability to balance their 2023/24 budgetary positions and beyond. The failure of the local government finance system to tackle issues around social care funding plus the continued impact of inflation in excess of that anticipated in the 2023/24 budgets, have put many councils in a perilous financial position.

The cost of service delivery has reflected an upwards trajectory for some time as a result of prevailing inflation and market conditions. However, the unprecedented levels of inflation in the last 2 calendar years have affected all service delivery costs creating a very steep upward trend for the Council's key service costs.

Difficulties in the external markets for both children and adults are well documented but issues including the cost of highly complex cases and higher than planned levels of inflationary increases in placement costs have exceeded the additional budgetary provision included within the Council's budget. In addition, very significant increases in demand for housing have developed through the year.

Management Action

Services have been implementing the budgetary responses outlined in the quarter 1 report to mitigate the overall budgetary position although it is not possible to disaggregate the impact of this from other aspects of the Council's budgetary position. In addition to these primarily one-off solutions, the focus has also turned to other actions with a forward-looking perspective to identify options and the service impact of reducing ongoing spend levels to within budget for political decision. Senior managers have undertaken review work looking at service and policy options to feed into the 2024/25 budget process and the result of this work is included within the Pre-Budget Report currently out to public consultation.

In totality, this work gives sufficient assurance that the Chief Operating Officer does not need to take any extra-ordinary action at this stage to respond to the financial position such as issuing a Section 114 Notice (a self-imposed limit on making any non-statutory expenditure as result of financial distress). However, Cabinet is reminded above that the underlying position for 2023/24 is incredibly challenging and that the Council will face some difficult choices in the future.

Capital

The Council's Capital Programme continues to include a range of strategically important schemes across the city. This continues to be a large mostly grant funded programme continuing the trend of recent years. The programme includes major scheme expenditure on secondary schools' expansion, Very Light Rail, the Air Quality programme, disabled facilities grant (DfG), the A45 Overbridge Eastern Green, City Centre South and support to the Friargate Hotel development.

Legal implications

None

6. Other implications

6.1 How will this contribute to the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

The Council monitors and reports separately on the quality and level of service provided to the citizens of Coventry and the key objectives of the One Coventry Plan. As far as possible it will try to deliver better value for money and maintain services in line with its corporate priorities balanced against the need to manage within a tight resource envelope.

6.2 How is risk being managed?

The need to deliver a stable and balanced financial position in the short and medium term is a key corporate risk for the local authority and is reflected in the corporate risk register. A recent reassessment indicates that the Council now faces a greatly increased level of risk in this area, described in section 5. Good financial discipline through budgetary monitoring continues to be paramount in managing this risk and this report is a key part of the process. A range of urgent actions has been set out in response to the Council's financial position. It is vital that Council officers and members are aware of the current financial challenge and that activity across the remainder of the year is successful. This in turn will dictate the extent to which the bottom line can be moved significantly closer to a balanced position.

6.3 What is the impact on the organisation?

It remains important for the Council to ensure that strict budget management continues to the year-end. The Council may be forced to make some difficult policy choices in the forthcoming Budget process especially in areas that do not have a strict statutory basis, and which involve material levels of discretionary and flexible expenditure.

6.4 Equalities / EIA

No current policy changes have been proposed but the possibility remains that the Council may need to consider changes to existing services. If this is the case, the Council's equality impact process will be used to evaluate the potential equalities impact of any proposed changes.

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

No impact at this stage although climate change and the environmental impact of the Council's decisions are likely to feature more strongly in the future.

6.6 Implications for partner organisations?

No impact.

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Names of approvers for submission: (officers and members)				
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This report is published on the council's website: www.coventry.gov.uk/councilmeetings

Appendix 1

Revenue Position: Detailed Directorate Breakdown of Forecasted Outturn Position

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

Service Area	Revised Net Budget	Forecast Spend	Centralised Variance	Budget Holder Variance	Total Variance
	£m	£m	£m	£m	£m
Adult Services & Housing	115.4	121.1	(1.7)	7.5	5.7
Business Investment & Culture	8.3	9.5	(0.0)	1.2	1.2
Children & Young People's Services	95.0	98.9	(2.7)	6.6	3.9
Contingency & Central Budgets	(35.2)	(39.3)	0.0	(4.1)	(4.1)
Education and Skills	20.3	19.0	(0.8)	(0.5)	(1.3)
Finance & Corporate Services	9.7	10.5	(0.3)	1.1	0.9
Human Resources	1.4	1.5	0.0	0.1	0.1
Legal & Governance Services	8.2	8.3	(0.7)	0.8	0.1
People Directorate Management	0.9	1.2	(0.1)	0.3	0.2
Project Management & Property Services	(8.4)	(8.5)	(0.4)	0.3	(0.1)
Public Health	1.0	(0.3)	0.0	(1.3)	(1.3)
Streetscene & Regulatory Services	33.3	35.6	(1.1)	3.3	2.2
Transportation & Highways	10.6	11.6	(0.4)	1.4	1.0
Total	260.5	269.0	(8.2)	16.7	8.5

Budget Holder Forecasts

Service Area	Reporting Area	Explanation	Budget Holder Variance £m
Adult Social Care	Strategic Commissioning (Adults)	Underspend relates to New Homes for Old PFI due to additional client fee income and the continuation of lower transport costs to day opportunities.	(0.7)
Adult Social Care	Housing and Homelessness	There are a number of reasons why the service is currently forecasting a significant overspend. The number of people seeking assistance with housing issues and subsequently the number being placed in Temporary Accommodation (TA) has increased by over 40% during 2023. During quarter 3 the upward trend has slowed and the number of households in	2.2

		TA has plateaued during the last 2 months. The cost of TA with private providers has increased by 15% from the 1st April (the first increase since the rates were set in 2019). A number of mitigations including purchasing additional TA, working with a Registered provider to provide us with an additional 50 flats for TA and new contracts with private providers are being progressed. The service has also developed and is implementing a detailed TA reduction plan. The increase in TA is a national issue with the highest number of households in TA in England being reported in Jun 2023. The overall overspend is partially offset by application of £0.6M migration grant resource against relevant additional costs.	
Adult Social Care	Adult Social Care Director	Overspend relates to an increase in bad debt provision of £0.9m and additional spend on joint health initiatives to improve provision across Health and Social Care of £1.1m partly off-set by iBCF grant underspend of -£0.3m.	0.8
Adult Social Care	Enablement & Therapy Services	Increased capitalisation of relevant salaries against Disabled Facilities Grant resulting in reduced revenue costs. Also, there are overspends on equipment purchases due to high inflation which have been offset by centralised underspends in salaries due to vacancies.	(0.3)
Adult Social Care	Internally Provided Services	Overspends on casual and overtime costs which have been offset by centralised underspends in salaries due to vacancies.	0.2
Adult Social Care	Community Purchasing Mental Health	The community purchasing budget is managed as a whole - please refer to the explanation against 'Community Purchasing Other'.	(0.4)
Adult Social Care	Adult Social Care Business & Financial Management	The over-spend comprises the CM2000 (Access 2000) implementation fees and back-dating of the contractual price increase equivalent to £1,300 per month to June 2022.	0.1
Adult Social Care	Partnerships and Social Care Operational	Overspends relating to additional agency costs which have been partly offset by centralised underspends due to staff vacancies.	0.5
Adult Social Care	Localities and Social Care Operational	Overspends relating to additional agency costs more than offset by centralised underspends due to staff vacancies.	0.4

Adult Social Care	Community Purchasing Other	The budget for purchasing packages of care for adults and older people in adults social care continues to see significant pressures. The service has seen an increase in the total number of packages of care, as well as increased activity across existing service users resulting in higher average costs to the budget. The increased activity reflects the complexity of the casework and the higher needs of those seeking our support with greater spend incurred in home care hours and supported living across adult services.	4.1
Adult Social Care	Mental Health Operational	There remains significant pressures in Deprivation of Liberty Assessment demand leading to additional assessment costs (£0.3m) in particular, doctors' assessment costs. Additional agency costs have been partly offset by underspends on centralised salaries due to vacancies.	0.6
TOTAL Adult Social Care Variance			7.5
Business Investment and Culture	Sports, Culture, Destination & Bus Relationships	<p>The position is likely to be improved by year end but can't be prudently quantified at this stage due to ongoing legal drafting on a negotiated income line. Budget holder variance of £0.8m at quarter 3 is mainly made up of:</p> <ol style="list-style-type: none"> 1. £790k Collection Centre non-pay spending without budget pending entering construction contract (£74k staffing costs on Centralised variance so total £864k pressure on collection centre spending); 2. £20k Brandon Wood golf course (BWGC) overspend on professional fees etc. incurred in options appraisal (total BWGC cost could be £110k but the overspend is likely to be absorbed by underspend from other Service budget (e.g. energy budget). 3. Godiva Festival overspend £78k due to a mix of reasons including income underachieved from sale of premium tickets (although sale of standard tickets performed well), shortfall from sponsorship income target, overspend on production costs etc. 4. £200k St Mary's projected income under achievement. Action has been taken to improve the position, but impact not yet evidenced. 	0.8

		<p>5. £166k sponsorship income underachieved although plan is in place to achieve income target from 2024-25</p> <p>6. Other net underspends offset most overspend on staffing costs (in centralised variation) mainly due to (£351k) budget for restructure with actual costs on staffing codes (in centralised variation); a further (£150k) budget for events this year, for restructure from 2024-25 not fully spent. Budget will be realigned when new structure is finalised (post-Service Review).</p>	
Business Investment and Culture	Employment & Adult Education	Reserve contribution from underspend in grant funded programmes. Net Overall variation is £18k underspend, centralised underspend due to vacancies not filled before new structure agreed. Majority underspend is grant related to be put into reserve for future programme spend in line with grant condition	0.5
Business Investment and Culture	Other Variances Less than 100K		(0.1)
TOTAL Business Investment and Culture Variance			1.2
Children and Young People's Services	Children's Services Management Team	This unbudgeted income is as a result of a successful grant bid to the Department for Education.	(0.4)
Children and Young People's Services	Commissioning, QA and Performance	The Safeguarding Children's Service is forecasting a budget holder overspend of £0.2M. There are overspends arising from agency staffing spend for Independent Reviewing Officers, Child Protection Chairs and Local Authority Designated Officer, given pressures arising from vacancies and caseloads. In addition, income from Safeguarding in Education training is £80K below the budgeted target set. There is a further budget holder overspend as a result of development of a Placements Portal. The overall position is mitigated in part by underspends across other areas of the service.	0.2
Children and Young People's Services	Help & Protection	There is a £2.6M budget holder overspend in the Area Teams, offset by a £1.7M underspend against centralised salaries. This overall £0.9M overspend is linked to staff costs, with high levels of cases	2.6

		<p>requiring additional workers and agency staff.</p> <p>There is a £0.5M budget holder overspend in Section 17 spend is attributable to high costs to commissioning services from private providers to support children with complex needs to remain safely at home. There has also been growth with specialist assessments which is met from S17 budget, drug testing, psychiatric / psychological, Parent Assess / PAMS, Cognitive Assessment, Aims assessment etc. as part of front loading assessments within Public Law Outline</p> <p>There are short-term one-off savings which are currently offsetting the budget pressures from additional grants and the use of earmarked reserves.</p>	
Children and Young People's Services	LAC & Care Leavers	<p>There is a £4M overspend on looked after children's (LAC) placements. This figure takes into account our expected increase in income from central government for unaccompanied asylum-seeking children which ensures these children do not contribute to the budgetary pressure. The overspend relates to external residential and is linked to increasing unit costs for placements due to a lack of sufficiency in the market to meet the needs of young people in care. This is despite a decrease in the number of looked after children and placement mix being in line with targets. There is a further budgetary pressure of £0.3M within the Children's Disability Service. This overspend relates to increased costs for short breaks & direct payments, DFG shortfalls and intensive support for some children to enable them to remain living at home, as an alternative to living in residential care. We are currently in the process of retendering our short breaks contracts to ensure 'best value' and reduce high-cost support spend.</p> <p>There is a budget pressure of £0.1M due to staffing challenges within the LAC Permanency Service and the need for agency staff to ensure that care proceedings continue to be progressed.</p>	4.2

		<p>This situation has now improved, and no agency workers remain. There is an overspend of £0.2M in the Internal Fostering Service due to a high number of staff taking maternity leave and agency cover being required.</p> <p>There is an overspend of £0.3M on Adoption Central England (ACE) that relates to an increase in interagency fees and pay increases. Work is being undertaken to address this and clarify the budgetary needs of ACE moving forwards. These pressures are offset in part by underspends across the service, including £0.2M in Through Care which is mainly due to vacancies.</p>	
TOTAL Children and Young People's Services Variance			6.6
Corporate & Contingency	Corporate Finance	<p>There is a forecast overspend for pay inflation contingencies (£1.6m) reflecting the final agreed local government employers' pay award. This is more than offset by favourable variances for other contingency budgets including (£2.7m) for AMRA due largely to higher cash flow interest receipts, anticipated controls to reduce discretionary expenditure (£1m), a delayed need to replace DSG funded education expenditure (£0.6m) and other minor underspends.</p>	(4.1)
TOTAL Corporate & Contingency Variance			(4.1)
Education and Skills	Customer and Business Services	<p>Customer Services is forecasting a budget holder underspend of £172K. Where possible the service has reviewed spending and applied constraints through the identification of alternative funding from time limited grants and the release of reserves.</p> <p>The underspend associated with the centralised forecast has resulted from the management of vacancies to facilitate structural change and support improved long term service delivery. The service area is starting to fill vacancies that have been on hold for a time, due to recruitment the impact is not yet showing in the centralised forecast.</p>	(0.2)

Education and Skills	Transformation Programme Office	Transformation Office is forecasting a budget holder underspend of £256K. The majority of this is a result of work undertaken earlier in the year to identify a saving of £143k via a release from reserves. Further on-going review of activity on professional fees has also allowed a further saving (£60k) to be released.	(0.3)
Education and Skills	SEND & Specialist Services	The quarter 2 SEN Travel Assistance forecast identified a budget pressure of £478k. This has reduced by £200k at quarter 3 as a direct consequence of management action to control the use and cost of taxis. In addition, an offset of £200k has been applied from reserves. Additional expenditure in external Educational Psychology costs has been offset by an equivalent under spend against centralised staffing costs.	0.2
Education and Skills	Education Entitlement	A proportion of the underspend is as a result of reduced expenditure on school bus passes. The number of pupils eligible for bus passes is based on statutory criteria and policy and has not reduced, but we are now only charged where passes are used. There is also an underspend against the interpreter service as a result of cost review and increased efficiencies. There is also an underspend against the Virtual School as a result of utilising additional pupil premium grant funding.	(0.2)
TOTAL Education and Skills Variance			(0.5)
Finance & Corporate Services	Revenues and Benefits	<p>There is a net Housing Benefit subsidy pressure of £0.7m caused by an increase in the volume and price of supported accommodation, for which the Council only receives partial subsidy payments if the provider is not a registered social landlord. In addition, there are higher than expected levels of local authority benefit overpayments.</p> <p>Pressures elsewhere (£0.5m) are primarily attributable to the cost of temporary staffing as a result of increased levels of work being received, cover for a higher than normal level of staff absence and increased underlying work levels in council tax.</p>	1.3

Finance & Corporate Services	Other Variances Less than 100K		(0.2)
Finance & Corporate Services Variance			1.1
Human Resources	Employment Services	Employment Services has a forecast overspend of £107K. This relates to a reduction in income from external organisations. It has not been possible to reduce costs further as a range of legislation and regulatory changes has created an increase in overall workload	0.1
Human Resources	ICT & Digital	Digital Services is forecasting a Budget Holder underspend of £151K. A decision to slow down the refresh cycle of laptops has created significant one-off savings. The shortfall on schools income of £433K due to reduced buy in as schools convert to academies and academies join larger MATs is an on-going and increasing problem. Additional contract and security costs are being offset by a range of spending reductions.	(0.2)
Human Resources	Other Variances Less than 100K		0.2
Human Resources Variance			0.1
Legal & Governance Services	Legal Services	Recruitment of staff (particularly lawyers) into vacant positions remains a challenging situation within the service despite numerous attempts made to advertise vacancies. As a consequence, there is a significant amount of expenditure (circa £700k) on agency staff which is offset in part by vacancies within the Legal Services team. The service is also managing additional workload in the children's social care sector which has made it difficult to end locum contracts.	0.5
Legal & Governance Services	Procurement	The variance is due to improved income performance from the early payment scheme	(0.1)
Legal & Governance Services	Regulatory Services	The variance is largely due to the use of external suppliers to cover vacancies in the Emergency Services Unit. In addition, there are income pressures in Building Control due to staff resourcing issues.	0.3
Legal & Governance Services	Democratic Services	Additional resource required to manage subject access requests whilst a permanent solution is investigated to	0.1

		manage and process the significant number of complex and large cases.	
Legal & Governance Services Variance			0.8
People Directorate Management			0.3
People Directorate Management Variance			0.3
Project Management and Property Services	Commercial Property and Development	<p>£1.4m is made up of:</p> <ol style="list-style-type: none"> 1. Overspend of £176k mainly on agency staff in Property Development is funded by vacant posts budget which includes budget to cover costs for one-year only; 2. Commercial Property BAU £569k rental property mainly due to income shortfall, void costs etc; 3. £125k retail market pressure as external supplies and services costs are higher than existing budget available 4. £136k City Centre South related mainly due to void NNDR charge, with former Aviva sites (£25K) net additional income received after the property handover date for development is delayed and cost for insurance. 5. £291k overhead overspend mainly due to agency costs higher than budget from vacant posts 6. £110k overspend on the major city centre development projects includes costs for former Aviva sites insurance charge and agency staff to be partially funded by budget in Property Development this year only. 	1.4
Project Management and Property Services	Facilities & Property Services	<p>£1.3m is made up of:</p> <ol style="list-style-type: none"> 1. (£560k) Energy underspend 2. (£650k) Operational Property R&M programme delayed controlling cost in this year 3. (£265k) R&M service income overachieved by (£200k) with saving from vacancies (£65k) 4. (£194k) savings from Business Rates 5. Pressure on rents £190k and £170k Fairfax L.C 	(1.3)
Project Management and Property Services	PMPS Management & Support	relates to additional A60 income target to be achieved	0.2

Project Management and Property Services Variance			0.3
Public Health	Public Health Staffing & Overheads	A result of the release of funding previously held in reserve	(0.3)
Public Health	Public Health - Migration	A result of some grant flexibility	(0.4)
Public Health	Public Health - Insight	A result of utilising some additional grant to support relevant public health costs.	(0.6)
Public Health Variance			(1.3)
Streetscene & Regulatory Services	Planning Services	There has been an overall reduction in planning applications since COVID which reflects the national trend. This is partly mitigated by an increase in fees effective from 1st October 2023.	0.2
Streetscene & Regulatory Services	Streetpride & Parks	The net variation across Street pride and Parks is £1.36m overspend due to a number of factors including: a) shortfalls in income - activities c£271k - in the parks (includes car park) b) Set up costs and non-achievement of (historic) savings target - Coventry Funeral Services c£330k c) Pressures in Urban Forestry of £208k due to Tree Surveys/Remedial works and inflationary pressures d) Various spend pressures across Parks c£190k e) A net overspend of c£274k on Street pride as a result of using Agency/Overtime to cover vacancies whilst the new structure is being implemented and, f) Traveller incursions c£100k	1.3
Streetscene & Regulatory Services	Waste & Fleet Services	Commercial Waste is currently under review and is forecasting a deficit of c£312k. A decision was made for a 3rd party to deliver the Waste Collection service alongside CCC staff at an additional net cost of £681k. There are also pressures in this area relating to Fleet (Spot Hires) due to HSE recommendations. Waste disposal is forecasting an o/spend of £439k partly due to higher than expected gate fee increases (mainly at WEP), increases in tonnages and additional costs associated with the WTS.	1.4

		(Anticipated savings related to SRL have been factored in to this.) PTS are forecasting an overspend of c£170k as a result of high sickness levels and additional Fleet costs. These pressures are all partly offset by a surplus in Fleet of c£288k which has arisen as a result of a combination of additional (one-off) income and savings on capital finance (time limited) as a result of the EV Programme.	
Streetscene & Regulatory Services	SSGS Management & Support	This relates to Legal costs associated with HSE and Equal Pay claims.	0.2
Streetscene & Regulatory Services	Environmental Services	Vacancies in Street Team Enforcement are being covered by O/time/Agency c£85k. There are also pressures in Pest Control relating to cover for vacancies c£29k, Kennel Safety Improvements c£17k and costs associated with re-homing pets c£15k (XL Bullies)	0.2
Streetscene & Regulatory Services Variance			3.3
Transportation & Highways	Traffic	The contract price for Street Lighting energy has risen during the highest period of usage (winter). In addition, contractual payments made to the PFI company have also been affected as they are partly based on energy rates.	0.7
Transportation & Highways	Highways	There is a pressure largely due to the anticipated costs to be incurred to address highways defects (£350k) together with the delayed achievement of some MTFS savings targets (£250k).	0.7
Transportation & Highways	Transport Policy	Savings have been made by forgoing expenditure and utilising grant funding for scheme development costs	(0.1)
Transportation & Highways	Other Variances Less than 100K		0.1
Transportation & Highways Variance			1.4
Ringfenced Funding	SEND & Specialist Services	Dedicated Schools Grant Variance: The number of Education Health and Care Plans maintained by the Council grew by circa 15% during 2023 against a forecast of 10%. Consequently, the Dedicated Schools Grant is absorbing a further £1.5 million of unplanned expenditure. Demand for specialist provision now exceeds locally available provision for some types of need	1.0

		in specific age ranges. Coventry has therefore increased its use of external / out of City placements to ensure children's needs are met. This is at a significantly higher unit cost compared to publicly funded schools. Any opportunity to increase the number of in-year commissioned special school placements has been taken and medium-term plans are evolving to expand local provision further. An offset of £0.4M under spend in respect of vacancy savings in SEN Support Services has been applied.	
Ringfenced Funding	Schools	Dedicated Schools Grant Variance: This underspend primarily relates to the Council's High Needs holding pot. This is budget that has been earmarked to support the Council's overall SEND Strategy and fund known provision cost pressures that will arise in future years.	(2.1)
Ringfenced Funding	Financial Strategy	Technical adjustment to remove total Dedicated Schools Grant Variance from the General Fund position.	1.2
Ringfenced Funding	Education Improvement & Standards	Dedicated Schools Grant Variance: This is a pooled fund for primary maintained schools that supports the funding of maternity leave for teachers. The number of staff taking maternity leave (including shared paternity leave) in the 23/24 financial year is lower than was estimated when the level of the fund was set resulting in an in-year underspend. We have adjusted and reduced the level of the fund for the 24/25 financial year, and any underspend will be ringfenced within the DSG reserve for de-delegated services.	(0.1)
Ringfenced Funding Variance			0.0
Total Non-Controllable Variances			16.7

Appendix 2

Capital Programme Approved / Technical Changes

SCHEME	EXPLANATION	£m
Highways Investment	The Prime Minister's Network North announcement on 4 October 2023 included a commitment to an additional £8.3 billion for local highway maintenance from 2023/24 - 2033/34. This equates to £439k additional funding that the Council will receive this financial year.	0.4
Eastern Green - A45 Overbridge	The awarded £15.6m from Homes England for the delivery of the A45 Overbridge at Eastern Green has now been fully drawn down and passported over to the developer. As Coventry City Council (CCC) are the accountable body for the delivery of the scheme, there is a legal agreement that the process moving forward will entail the developer re-imbursing CCC all invoiced amounts prior to CCC paying these funds over to the contractor. This ensures no financial risk to CCC.	6.0
Education Programme - Basic Need	Further S106 funds have been paid by Developers on completion of housing developments for Pickford Lane and Paragon park	1.1
Devolved Formula Capital Energy Eff	This is a new Grant - Eligible schools and sixth-form colleges will receive an allocation from an additional £447 million of capital funding to improve energy efficiency in 2022 to 2023. This is part of an additional £500 million of capital funding for schools and further education institutions in England.	0.5
MRF (Sherbourne Recycling Loan)	The technical change is due an overstated forecast of interest payments	(0.5)
UKSPF - Coventry UK Shared Prosperity Fund - Job Shop	Re-profiled after additional grant funding, an additional £200k from UKSPF, £150k from WMCA and £150k from Landlord Contribution	0.5
Green Homes Grant Phase 3	Technical change of re-profiling across the capital 5 year programme to reflect the latest reported position.	0.5
Cultural Gateway	Report taken to Cabinet on 14 th March 2023 – City Centre Cultural Gateway Project with an approval of capital expenditure up to £48.6m. The £0.8m change to the programme reflects the first drawn down of these funds to cover professional fees towards the Collection Centre Development.	0.8
Miscellaneous	Schemes below £250k threshold	0.3
TOTAL APPROVED / TECHNICAL CHANGES		9.6

Appendix 3

Capital Programme: Analysis of Rescheduling

SCHEME	EXPLANATION	£m
Coventry Very Light Rail	The process of securing funding approvals from the Department for Transport has taken longer than initially programmed, which has in turn meant that work on the City Centre Demonstrator (CCD) project has been delayed with delivery now programmed for 2024/25 financial year. Work has progressed on the development and testing of the prototype vehicle, which is well advanced, and on the testing of the track, with test sites at the Whitley Depot, University of Warwick and the VLR National Innovation Centre at Dudley. The re-profiling of funding reflects the revised programme for the CCD project.	(5.0)
Friargate Building 2	Report taken to Cabinet on 25th August 2020 - Funding and Delivery of Friargate 2. The £362k acceleration of spend relates to the specific report recommendation of capital expenditure up to a capped amount of £17m from prudential borrowing to fund the grant of the 250 years long leasehold interest in the land to the Council and the delivery of the building to be constructed on Two Friargate.	0.4
Local Network Improvement Plan (LNIP)	<p>Schemes identified for delivery through the Local Safety Schemes (LSS) were intended to stretch across multiple years due to the size and complexity of the schemes to be delivered. Year 1 has focused and prioritised on scheme investigation and development with design work taking place to enable delivery of schemes from April 2024.</p> <p>The UTMCI LNIP programme is aligned with service resources and delivery priorities in 2023/24 which has focused on delivery of the Binley Cycle Scheme, Air Quality Programme and Key Route Network schemes which sit separate to the LNIP programme. It is also noted that in quarter 3 the DfT announced a bidding opportunity for funding to refresh existing signals assets which aligns with priorities in our existing LNIP programme and as such delivery has been paused and proposed to be rescheduled into 2024/25 to tie in with the funding announcement which is now expected in March 2024.</p>	(0.6)
City Region Sustainable Transport Settlement (CRSTS) - Foleshill Transport Package	Process to submit business case has taken longer than initially planned and resource switching to secure Active Trave for England extension (ATF4e) bid funding for the scheme. Work has progressed on the design of the scheme; business case for Blue Ribbon Roundabout submitted; consultation exercise completed and £2.15m provisionally secured through ATF4e. The re-profiling of funding reflects the revised programme for the Foleshill Transport Package.	(1.1)
City Region Sustainable Transport Settlement	Process to submit the business case and detailed design work; took longer than initially planned due to resource limitations and changes following feedback from stakeholders. The first package of work (Abbey Road / London Road junction) is in construction,	(2.4)

(CRSTS) - Coventry South Transport Package	business case submitted, and design of other works packages are underway. The re-profiling of funding reflects the revised programme for the Coventry South Transport Package.	
Loans -Duplex	The drawdown of the loan is dependant on the demand for on lending	(0.6)
Children with disabilities new build home	The build programme time slippage, and this is mainly due to the procurement of the build contractor taking longer than expected and costs coming back higher than expected. All of this pushed the build programme back, and as such costs have slipped into the next financial year.	(0.6)
Provision of Temporary Accommodation	As approved at Cabinet on 15th March 2022, phase 2 £7m to purchase, refurbish and manage properties to use as Temporary Housing for homeless families. Due to the success of the programme, following the delivery of phase 1 we are now in a position to accelerate the proposed funding sitting in next financial year.	0.9
Residential Home (Short Term)	An element of the works that were due be completed by the end of the financial year have started later than anticipated, therefore the works will now be completed in 2024-25 financial year.	(0.5)
Multi Storey Car Parks - New Union Street Car Park Demolition	The rescheduling is due to Contractors not being on site until end of year so payments will not be made until the first quarter of 24/25	(0.5)
Woodlands	Project delayed due to planning pre-commencement conditions issues and change of requirement by Sidney Stringer Multi Academy Trust in relation to the temporary accommodation to rehouse pupils out of building scheduled for demolition	(1.8)
Basic Need	A few projects have been brought forward from their originally envisaged cashflow, this being due to starting projects earlier than designed and some additional enabling works have been undertaken before the formal start of projects so that on official start all/most of the information required is readily available.	0.5
Miscellaneous	Schemes below £250k rescheduling	(0.4)
TOTAL RESCHEDULING		(11.7)

Appendix 4

Prudential Indicators

Indicator	per Treasury Management Strategy 2023/24	As at 31 Dec 2023
Ratio of Financing Costs to Net Revenue Stream (Indicator 1) , This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet borrowing costs.	14.98%	14.60%
Gross Borrowing should not, except in the short term, exceed the total of the Capital Financing Requirement (CFR) at 31st March 2023 plus the estimates of any additional CFR in the next 3 years (Indicator 2) , illustrating that, over the medium term, net borrowing (borrowing less investments) will only be for capital purposes. The CFR is defined as the Council's underlying need to borrow, after taking account of other resources available to fund the capital programme and is the amount of capital expenditure that has not yet been financed by capital receipts, capital grants or contributions from revenue.	Estimate / limit of £546.2m	£312.7m Gross borrowing within the limit.
Authorised Limit for External Debt (Indicator 5) , This statutory limit sets the maximum level of external borrowing on a gross basis (i.e. excluding investments) for the Council. Borrowing at this level could be afforded in the short term but is not sustainable. The Authorised limit has been set on the estimated debt with sufficient headroom over and above this to allow for unexpected cash movements.	£534.8m	£312.7m is less than the authorised limit.
Operational Boundary for External Debt (Indicator 6) , This indicator refers to the means by which the Council manages its external debt to ensure it remains within the statutory Authorised Limit. It differs from the authorised limit as it is based on the most likely scenario in terms of capital spend and financing during the year. It is not a limit and actual borrowing could vary around this boundary for short times during the year.	£514.8m	£312.7m is less than the operational boundary.
Upper Limit on Fixed Rate Interest Rate Exposures (Indicator 9) , These indicators allow the Council to manage the extent to which it is exposed to changes in interest rates. The Upper Limit for variable rate exposure has been set to ensure that the Council is not exposed to interest rate rises which could impact negatively on the overall financial position.	£480.9m	£245.7m
Upper Limit on Variable Rate Interest Rate Exposures (Indicator 9) , as above highlighting interest rate exposure risk.	£96.2m	-£68.8m
Maturity Structure Limits (Indicator 10) , This indicator highlights the existence of any large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates and is designed to		

<p>protect against excessive exposures to interest rate changes in any one period, thereby managing the effects of refinancing risks.</p> <p>The maturity of borrowing is determined by reference to the earliest date on which the lender can require payment.</p> <p>< 12 months</p> <p>12 months – 24 months</p> <p>24 months – 5 years</p> <p>5 years – 10 years</p> <p>10 years +</p>	<p>0% to 50%</p> <p>0% to 20%</p> <p>0% to 30%</p> <p>0% to 30%</p> <p>40% to 100%</p>	<p>4%</p> <p>13%</p> <p>9%</p> <p>12%</p> <p>62%</p>
<p><i>Investments Longer than 364 Days (Indicator 11)</i>, This indicator sets an upper limit for the level of investment that may be fixed for a period greater than 364 days. This limit is set to contain exposure to credit and liquidity risk.</p>	<p>£30m</p>	<p>£0.0m</p>

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Public report Cabinet Report

Cabinet

13th February 2024

Name of Cabinet Member:

Cabinet Member for Education and Skills – Councillor Dr K Sandhu

Director Approving Submission of the report:

Chief Partnerships Officer

Ward(s) affected:

All

Title: Coventry One Strategic Plan and Education Capital Programme 2023 - 2027

Is this a key decision?

Yes - the proposals will significantly affect all wards.

Executive Summary:

Under Section 14 of the Education Act 1996, Coventry City Council has a statutory duty to ensure sufficient school places and fair, appropriate access to education. It is the Council's role to plan, commission and organise school places in a way that raises standards, manages supply and demand.

The Coventry One Strategic Plan, first presented to Council on 2nd October 2018, sets out pupil forecasts for special, primary, and secondary pupils across education planning areas in response to rising or falling pupil cohorts across the city. It outlines the strategy proposed by the Local Authority and the Coventry Education Partnership to meet the additional places required in secondary provision from 2023-2027. Work has also been undertaken to look at the Special School provision and the primary estate in line with falling birth rates and new housing, outlining how we will mitigate against these factors.

It is proposed that this strategy will be a flexible plan, able to adapt to shifting mechanisms of parental preference, unforeseen changes in supply and demand of school places, and future birth rates. To do this, the One Strategic Plan will be monitored and updated annually with presentation to the Education Portfolio Councillor, and Cabinet, alongside a wider process of constant review of School Place Planning. In addition, the procuring of places will take place annually so as not to create an unstable number of school places.

This partnership commitment signifies a statement of intent to collaborate and work in partnership to achieve the best possible outcomes for children and young people in Coventry, ensure the sustainability of Coventry schools, and to enable the City Council to meet its statutory obligations. As part of this process, numerous options have been

discussed at both full Coventry Education Partnership meetings, and the Secondary Headteacher Executive. The preferred option presented below has been approved by the Coventry Education Partnership as being the best valid option keeping in line with our statutory requirement as outlined by the DfE to:

- i. Spend capital funding efficiently.
- ii. Safeguard the quality of places in the system.
- iii. Manage down spare capacity in the estate where it exists.

Capital allocations to meet projected shortfalls in provision are provided by the Education Skills Funding Agency (ESFA) to all Local Authorities based on the data provided in the annual School Capacity return (SCAP). Demand for places minus the supply of places is multiplied by a cost per pupil place to inform the final allocation. This return informs the ESFA of the expected change in pupil numbers over the next few years, the current capacity of schools to meet those numbers and the planned changes to that capacity.

Since 2022 there has been a large increase in the number of pupils moving into the city each academic year. The impact of this in-year movement has been that more spaces are required in schools than forecast, using up spare capacity and causing sufficiency pressures in some year groups. In response, a review and update of pupil forecast methodology has taken place, and additional school expansions as set out within this report.

Recommendations:

Cabinet is requested to:

- 1) Authorise the programme of work outlined within the proposed Coventry One Strategic Plan for Primary, Secondary and Special Educational Needs (SEN) Education.
- 2) Delegate authority to the Chief Partnerships Officer to agree the most appropriate procurement route for the works to be delivered and awarded.
- 3) Subject to acting within existing budgets, authorise the acquisition of such land by way of agreement as is required to facilitate sufficiency of school places within Coventry.
- 4) Delegate authority to the Director of Property Services and Development and Chief Partnerships Officer, following consultation with the Chief Operating Officer and Chief Legal Officer, to undertake all necessary due diligence including acceptance of terms for such Acquisition and the entering into appropriate legal agreements.
- 5) Authorise the funding stream as set out in section 2.4 of the report to be utilised for the delivery of programme of works in relation to primary, secondary and SEND places within the Coventry One Strategic Plan.
- 6) Note the increased fees for academy conversion recoupment charges as set out in section 4 of the report.

List of Appendices included:

Appendix 1: One Strategic Plan 2023-2027

Background papers:

None

Other useful documents

Cabinet report – academy charges 2016

Coventry One Strategic Plan and Education Capital Programme
Cabinet Report – 18th February 2020

<https://edemocracy.coventry.gov.uk/ieListDocuments.aspx?Cid=124&Mid=11948#AI30130>

Coventry One Strategic Plan – Phase 2 Secondary School Expansions
Cabinet Report – 13th October 2020

<https://edemocracy.coventry.gov.uk/ieListDocuments.aspx?Cid=124&Mid=12245&Ver=4>

Woodlands Cabinet Report – 12th October 2021

<https://edemocracy.coventry.gov.uk/documents/s51379/SEND%20Proposal%20for%20the%20Use%20of%20the%20Woodlands%20Site.pdf>

Coventry One Strategic Plan and Education Capital Programme
Cabinet Report – 10th January 2023

<https://edemocracy.coventry.gov.uk/ieListDocuments.aspx?Cid=124&Mid=12821&Ver=4>

Has it been or will it be considered by Scrutiny?

No

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

No

Will this report go to Council?

No

1. Context (or background)

- 1.1. The Coventry One Strategic Plan sets out pupil forecasts for primary and secondary across education planning areas in response to rising or falling pupil cohorts across the city. It outlines the strategy proposed by the Local Authority and the Coventry Education Partnership to meet the additional places required in all phases of education (Early Years, Primary, Secondary and Special Education Needs (SEN)) from 2023 – 2027.
- 1.2. The Council holds the statutory duty to ensure sufficiency of places. Where a school is an Academy or Free School their admissions arrangements are outside of Local Authority control and therefore early discussions and input from Academies is crucial to delivering the required number of school places across the city.
- 1.3. The Department for Education (DfE) provides each Local Authority with an annual update on the estimated cost per providing a school place nationally, with a local variation. Coventry uses these figures to inform their S106 contributions from housing developers. Accordingly, the cost per pupil place as outlined in the appendix has been updated to reflect this change.

1.4. Primary

- 1.4.1 The birth cohort is continuing to reduce, although it is not impacting on the sufficiency of school places because of the increase of in-year applications from pupils relocating from outside of the city.
- 1.4.2 The recent increase in demand of school places across the city because of in-year migration has led to increased numbers in most year groups, and in some cases requiring schools to go over their Published Admission Number (PAN).
- 1.4.3 We have put in place a temporary expansion programme for existing Primary schools to accommodate this increase. From September 2023, additional bulge classes were added in Moat House Primary School, Frederick Bird Primary School, and Moseley Primary School. This was to ensure sufficiency of places, viability for schools, and cost efficiency.
- 1.4.4 More temporary school expansions will be implemented from 2024 onwards to manage and assist with the increased temporary demand for school places. This will be flexible and developed in partnership with schools in the city.
- 1.4.5 There is no current requirement to permanently increase school PAN's due to the continued decreased birth rate.

1.5. Secondary

- 1.5.1. Since September 2018, additional capacity has been added in Secondary schools to provide for the larger cohorts identified through the pupil forecasts. As agreed at Coventry Education Partnership meetings, the plan has been to deliver and adopt a model of both permanent and temporary expansions to ensure sufficiency of places, viability for schools, and cost efficiency. Temporary expansions are for a single year (e.g., Year 7 increase, and that increase then moves through the school until that

cohort reaches Year 11). Adopting a mixed economy model of permanent and temporary expansions will ensure the safeguarding of the future viability of the school estate, and longer term will allow for a more flexible approach to be adopted in increasing and reducing capacity as required.

- 1.5.2. The phase one expansions, covering years 2018 to 2021, were presented to Cabinet in October 2018 to address required growth in school places across existing secondary schools. It demonstrated an approach of flexibility, adaptability, and foresight, ensuring that the Education could respond effectively to the additional pupils as a result of birth rate increase.
- 1.5.3. Phase 2 was presented in October 2020, and cover increases between 2022 – 2024. All these expansions are ongoing and due to complete this year.
- 1.5.4. Phase 1 and phase 2 have successfully provided sufficient year 7 places across these years. However, due to the increased number of pupils within primary schools, as a result of in-year growth rather than birth cohort (as set out above), there has been a need to develop and introduce Phase 3 covering years 2024-2027 to effectively manage and assist with the increased demand for school places.
- 1.5.5. Phase 3 plan will continue with the flexible approach to delivering school places using temporary and permanent school expansions, ensuring efficient use of basic need funding by partially reusing building capacity added in previous years to deliver previous temporary expansion.
- 1.5.6. Due to the reduced birth rate, it is expected that the cohort moving into year 7 from September 2028 will be reduced. With this in mind, the strategy continues to deliver places in a flexible approach responding to the supply and demand. As the admissions trends have changed very recently regarding in-year applicants, this position is being regularly reviewed to consider whether more permanent provision is required in the longer term.

1.6. **Special Education Needs and Disability (SEND)**

- 1.6.1. Local Authorities have a statutory duty to ensure, that all learners who are subject to an Education, Health and Care Plan receive the provision they require to meet their assessed needs. This means that LAs have to provide a continuum of provision to meet a continuum of need. Coventry currently has 8 specialist provisions delivered in the form of resourced centres/units in mainstream schools. It also has special school provision across 8 schools.
- 1.6.2. Recent evidenced growth in need, an increase in in-year admissions, and extended retention in post 16 provision, specifically in the areas of learning disability, complex communication (autism spectrum conditions) and social emotional and mental health (SEMH), has placed an unprecedented level of demand on the special school system. This reflects the national position.
- 1.6.3. In Coventry 18.2% of pupils have an EHC (Education Health Care) Plan or are receiving SEN support (previously school action and school action plus). This compares to an average of 17.1% across All local authorities in the West Midlands and 16.5% Nationally. Although the SEND Support Cohort is larger than regional and national benchmarks, CCC EHCP cohort is lower.

- 1.6.4. Coventry schools, early years and further education providers identify SEND and access appropriate support for their SEND cohort through the local offer. The SEND local offer is strong, and therefore a greater proportion of children have their needs met at 'SEND Support' without the need for an EHC Plan.
- 1.6.5. Between September 2017 and 2024 there have been c.400 places added across the Special School estate and it is expected further expansion will be required.

2. Options considered and recommended proposal.

2.1. Primary Schools options and recommended proposal

- 2.1.1 Despite the decreasing birth rate, and previously forecast reduction in school places, the increase in in-year applications means we are required to respond to continued sufficiency need in the primary sector to deliver our statutory duty. Education are looking to expand primary school capacity using bulge (temporary) classes.
- 2.1.2 The Local Authority has been working in partnership with schools to open bulge classes across year groups 1 – 5 to provide additional places. Schools will receive an extra revenue budget allocation to accommodate these, and where required additional classroom spaces/capital investment.
- 2.1.3 The council has secured land for primary provision at 2 housing developments in the city. These remain crucial to ensure sufficiency of places in the longer term when the housing developments are in progress and completed. The option to relocate and expand existing schools is being explored and the projects will be progressed in line with receipt of funding and demand for places in the area.

2.2. Secondary School options and recommended proposal

- 2.2.1. Across the Phase 1 and Phase 2 programme's there have been c.1,300 additional pupil places added (temporary and permanent) to support the increase in demand for Secondary school places in the City from September 2018 to September 2024.
- 2.2.2. Implementation of the Phase 3 programme covering years 2024-2027 is now underway to effectively manage and assist with increased demand for school places over the short to medium term. Within Phase 3 there is an additional 12 temporary, and 4 permanent forms of entry proposed across secondary schools (960 additional places).
- 2.2.3. Our approach in phase 1 and 2 to add provision that allows schools to be flexible to sufficiency requirements has been effective and demonstrated efficient use of resources. It is planned that some of the provision added in phase 1 and 2 that supported temporary expansion is reutilised to provide the additional classes required for phase 3. Where further building expansion is required, this will be funded from the education capital programme as set out in section 2.3.
- 2.2.4. Due to the unknown level of in-year migration over the longer term, and subsequent impact across primary and secondary sufficiency, there may be a requirement for additional land for secondary provision. This is being monitored as part of the sufficiency requirement and funding may be required for purchase of land.

2.2.5. **Special Education Needs Options**

- 2.2.6. Coventry City Council have been allocated funding to create new school places and improve existing facilities for children and young people with SEND. This funding totals c£19.5m (Special Provision Fund and High Needs Provision) and is allocated across multiple projects, to create 308 places within Coventry SEN schools.
- 2.2.7. A separate report to Cabinet to address the proposed strategy to meet the demand for Social Emotional Mental Health (SEMH) need by expanding and relocating Woodfield Special school was presented in October 2021.
- 2.2.8. Further projects at Sherbourne Fields, Baginton Fields and Corley Special Schools are also being planned to provide additional specialist secondary school places.
- 2.2.9. In order to expand our inclusive education offer, expansion of mainstream primary schools to provide enhanced resource provisions (ERP) is also underway. These ERPs will accommodate c8-10 pupils per provision and will be managed by multiple schools within the city. Education are planning to open a further 3 ERPs from September 2024, with further planned in subsequent years.

2.3. **Finance**

- 2.3.1. Basic need funding is allocated to Local Authorities to meet the demand for pupil places. Allocations have been announced up to 25/26 academic year, but due to the central government spending review the funding for the 2026-27 allocations has been delayed. Consequently, there will be no allocation published in March 2024 as per practice, this could mean that there is insufficient funding to meet the required capital projects to deliver our sufficiency duty within the appropriate timescale.

Year of Allocation	£
Historic Funding Received	14,665,000
19/20 Allocation	3,913,000
20/21 Allocation	6,237,000
21/22 Allocation	23,733,503.95
22/23 Allocation	£13,724,521.70
23/24 Allocation	£20,175,916
24/25 Allocation	£275,551
25/26 Allocation (Nil Allocation)	£0
TOTAL FUNDING	82,724,761.65

- 2.3.2. Coventry City Council received an additional £15m towards SEND provision in March 2022 and some of this funding has been utilised to expand existing SEND special schools. It is proposed the remaining funds will be utilised to facilitate the relocation and expansion of Woodfield Special School and address building works required for expansion at Baginton Special School. A final tranche of funding will be announced in March 2024 which will be utilised for enhancing existing education projects.
- 2.3.3. Overall capital resources for One Strategic Plan. This funding has been allocated to deliver priorities as set out in the strategy.

Funding Stream	£
Education Capital Basic Need up to 2024/25	82,724,761.65
S106 for Education (funding received)	12,113,416.03
Education Special Provision Fund	3,950,018.00
High Needs Capital Funding including 23/24 Allocation	15,573,500.00
Other Capital Resources (land receipts)	11,898,228.21
TOTAL One Strategic Plan	126,259,923.89

2.4 Academy Conversion Charges

- 2.4.1 In line with the agreement by Cabinet in 2016, the Council charge the School or multi-academy trust for the time and services up to completion of the academisation process.
- 2.4.2 The charges approved in January 2016 totalled £6,750 and have not been increased over this period. As a result of increased salary costs due to inflation, academisation recoupment fees have been reviewed and increased as set out below.
- 2.4.3 The updated academy conversion recoupment charges will be applied to all conversions from January 2024:

Invoice item	Amount
Conversion fees for Finance Service	£2,000
Conversion fees for Legal Service	£3,900
Conversion fees for Capital Strategy Service	£1,015
Conversion fees for HR Service	£1,200
Total	£8,115

3. Results of consultation undertaken

- 3.1.1. As academies, any schools included in the Secondary recommended option are required to consult for their expansion and inform the Department of Education of this consultation. The Council have consulted with Primary, Secondary, and SEN headteachers via Coventry Education Partnership meetings to co-produce this One Strategic Plan. For Primary, and SEND, depending upon whether the school is maintained or academy, the responsibility for conducting the consultation will either sit with Coventry City Council or with the school.

4. Timetable for implementing this decision

The timescale for the One Strategic Plan is set out in the following table:

Activity	Approximate Timing
Consultation with Primary, Secondary and SEND Headteachers via Coventry Education Partnership meetings	June 2023 – November 2023
Report to Cabinet for adoption of the policy set out in the One Strategic Plan and recommendations	February 2024

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

5.1. Financial implications

Capital resources for the One Strategic Plan are a cumulation of several funding streams, including provisional future year allocations which could still be subject to some change. Project costs are also indicative until the point of awarding contracts and therefore may differ from those currently anticipated.

The overall programme of works may need to be adjusted to ensure spend is not committed above the available resource. And balanced against sufficiency requirements.

The revenue cost of places in mainstream schools is funded via the Schools Block element of the Dedicated Schools Grant (DSG). Within the Schools Block local authorities receive a Growth Fund allocation which enables them to support schools with in-year pupil growth which is not otherwise immediately recognised by the lagged funding system.

The revenue cost of places in specialist provisions for pupils with SEN is funded via the High Needs Block element of the DSG. There is a risk that the revenue cost of increased statutory demand will exceed our High Needs Block allocation. In response a High Needs medium term financial strategy is being developed to consider options for managing this risk.

5.2. Legal implications

Section (S) 13 of the Education Act 1996 places the Local Authority under a duty to promote high standards and fair access to education. S14 of the Education Act 1996 sets out the Local Authority's duty to secure sufficient schools in their area, and to consider the need to secure provision for children with SEN. This includes a duty to respond to parents' representations about school provision.

The Local Authority has a wide discretion in exercising the S 14 duty but has to follow statutory processes when establishing, closing, or making alterations to a school as set out in the Education and Inspections Act 2006 and School Organisation (Prescribed Alterations to Maintained Schools (England) Regulations 2013. Failure to comply with statutory requirements would leave the Local Authority unable to make the proposed changes and subject to action by the DfE. Reduction to the published admission numbers (PAN) at maintained mainstream schools are not subject to compliance with the School Organisation (Prescribed Alterations to Maintained Schools (England) Regulations 2013, although admission authorities (the Local Authority) in the case of community and voluntary controlled schools, the governing body in the case of voluntary aided and foundations schools, and the academy trust in the case of academy schools, must consult as required by School Admissions Code 2014 (SAC).

The SAC provides that when changes are proposed to admission arrangements, all admission authorities must consult on their admission arrangements (including any supplementary information form) that will apply for admission applications the following school year. Where the admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that

admission authorities must consult on their admission arrangements at least once every 7 years, even if there have been no changes during that period. Community and Voluntary Controlled schools have the right to object to the Schools' Adjudicator if the PAN proposed is lower than they would wish.

Land Acquisition

Section 120 of the Local Government Act 1972 provides that for the purposes of (a) any of the Council's functions under this or any other enactment or (b) the benefit, improvement or the development of the Council's area, the Council may acquire any land whether situated inside or outside its area.

Law and Governance Services will be required to undertake the necessary legal due diligence including examining search results and the title for the property. Enquiries before contract will be raised and the purchase will be subject to satisfactory results of the searches, a good and marketable title and a satisfactory survey and valuation result.

6. Other implications

This strategy supports the One Coventry Plan priorities:

- Improving outcomes and tackling inequalities within our communities – Education endeavour to ensure sufficient school places within each locality, creating quality, accessible and inclusive provision across the city.
- Tackling the causes and consequences of climate change – when delivering building works on school sites Education consider it a priority to invest in environmental infrastructure. Examples include implementing solar PVs, air source heat pumps and using local materials (where possible) to reduce the carbon footprint.

6.1. How is risk being managed?

Monitoring is carried out through several different processes. This project will be monitored through a project management team and will be subject to careful scrutiny and regular assessment on progress towards identified milestones. Further monitoring will be carried out through progress reports to the Cabinet Member (Education and Skills), Cabinet, and quarterly budgetary control monitoring.

6.2. What is the impact on the organisation?

There are no specific impacts on the organisation.

6.3. Equalities Impact Assessment (EIA)

Children and young people with SEND can experience greater discrimination and may have fewer opportunities than children without SEND. The proposal aims to ensure that all Coventry children have access to education in accordance with their needs. Any revised accommodation changes and admission arrangements take into account the provisions of the Equality Act 2010 in the context of their possible impact on equal opportunities.

Public authority decision makers are under a duty to have due regard to 1) the need to eliminate discrimination, 2) advance equality of opportunity between people who share a protected characteristic and those who do not 3) foster good relations

between persons who share a relevant protected characteristic and people who do not (public sector equality duty - s 149(1) Equality Act 2010). The applicable protected characteristics are disability, gender reassignment; race, religion or belief, sex; sexual orientation, pregnancy or maternity.

Decision makers must be consciously thinking about these three aims as part of their decision-making process with rigour and with an open mind. The duty is to have “due regard”, not to achieve a result but to have due regard to the need to achieve these goals. Consideration being given to the potential adverse impacts and the measures needed to minimise any discriminatory effects.

Each school has been assessed thoroughly in line with the Disability Discrimination Act 2004⁷ and meet the requirements of the Building Regulations and relevant British Standards including BS 8300 2009. Specific provisions of inclusion for wheelchair users; hard of hearing and visually impaired have been included in the designs. An access statement is provided for each school to act as an on-going live document. It documents the initial building approach and becomes an effective building management tool for the users to ensuring long term accessibility.

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

The Department for Education’s Sustainability and Climate Change Strategy sets out a vision for the UK to be the world-leading education sector in sustainability and climate change by 2030. In England this will be achieved through both education and practical steps to transition to net zero, create more resilient infrastructure to adapt to a changing climate and create a better environment around education settings which includes enhancing biodiversity and improving air quality. By 2025, government requires all education settings to put in place Climate Action Plans.

Coventry has 117 schools (excluding private owned). Of these 117 schools, 52% are LEA schools and purchase energy from Coventry City Council and therefore, captured within scope 3 of Coventry City Council’s annual greenhouse gas emissions report. LEA schools account for 9% of Council emissions.

All future build programmes will need to be designed to a high standard of energy efficiency and be net zero in operation. They will be required to be designed to adapt to a changing climate. Any new school buildings designs should prepare for and mitigate against the effects of climate change, including measures to reduce surface water run off because of flooding, reducing any negative effects on the local community and environmental infrastructure. Opportunities should be identified to create green space, sustainable urban drainage and enhance biodiversity. The design needs to consider measures for thermal cooling to ensure new buildings can cope with more extreme temperatures, alongside making provision for outdoor shade.

Opportunities should be identified to improve the energy efficiency and climate resilience of existing buildings as part of any planned refurbishment. As part of this, consideration should be given to using the capital programme to leverage additional grant funding to support decarbonisation projects on existing schools, such as the Public Sector Decarbonisation Scheme 3b that is supporting the delivery of measures to upgrade heating systems and install renewable energy across some schools in 2024-25. The Council’s Strategic Energy Partnership with E.ON will

endeavour to support this programme through seeking to introduce more solar PV across Coventry schools.

As part of the DFE's Sustainability and Climate Change Strategy, all schools will need to report their carbon emissions and set and monitor against targets for carbon reduction. In order to support this, future cost benefit analysis will need to incorporate the environmental and socio-economic costs of the impacts of carbon emissions and consider climate resilience and adaptation.

6.5. Implications for partner organisations?

Planning for additional SEND places will require close partnership working with the Health, Social Care and Private/Voluntary Organisations and will enable multi-agency support and provision for children with SEND to be made.

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

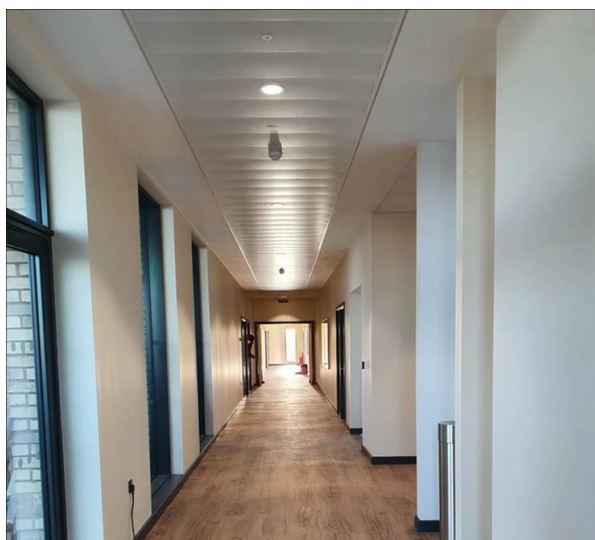
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Coventry City Council

Education and Learning

One Strategic Plan

2023 - 2027



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1.0 Introduction

1.1. Coventry's Education and Learning Vision

The One Coventry Plan 22-30 sets out our vision and priorities for the city including 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.

As part of this organisations in Coventry will work together to deliver so they can provide the best support possible for children, young people, and their families.

There are three key priorities within the plan:

- 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

In this context, the One Strategic Plan for Education will help schools, parents, council staff, local partners and stakeholders understand how Coventry City Council plans to work towards these priorities by providing school places to ensure that all children and young people thrive in Coventry schools and settings throughout their education, wherever they live.

This document sets out the principles underpinning school place planning; the ways in which places will be delivered, the information used to inform this delivery, and the way work is conducted to deliver high quality, accessible school places for all learners.

1.2. Statutory Context

Coventry City Council (CCC) has a legal duty under Section 14 of the Education Act 1996, to ensure sufficient school places and fair, appropriate access to education. It is the Council's role to plan, commission and organise school places in a way that raises

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standards, manages supply and demand, and creates a diverse infrastructure. This enables the Council to:

- ensure sufficient schools and places in a locality;
- secure sufficient early years & childcare places;
- ensure sufficient post 16 provision;
- provide appropriate education provision for children with special educational needs and disabilities;
- promote high education standards;
- ensure fair access to educational opportunity;
- promote the fulfilment of every child's education potential and
- promote diversity and parental choice.

The council holds statutory responsibility for allocating school places across all types of schools, encompassing Academies and Free Schools. In the City Council's planning of school placements, these various school types are given equal consideration.

1.3. Coordinated Strategic approach

A memorandum of understanding (MOU) has been established to ensure partnership commitment between the CCC and Coventry Secondary Schools which will continue to support the strategic plan for the delivery of additional school places 2023 to 2027. This approach will be rolled out to primary and special to mitigate or meet demand through a partnership strategy.

This partnership commitment signifies a statement of intent to collaborate and work in partnership between the Council, governing bodies, multi-academy trusts (MATs) and school leadership teams to achieve the best possible outcomes for children and young people in Coventry, ensure the sustainability of Coventry schools, and to enable the CCC to meet its statutory obligations.

The MOU has established a partnership commitment concerning the below principles:

1. The Council and all Coventry schools have a shared interest in ensuring all pupils have access to good quality local provision.
2. School organisation issues rarely affect schools in isolation; therefore, strong partnership is important to understanding the impact of school organisation decisions.
3. A partnership approach is therefore required to create the strategic plan based on a set of agreed partnership principles:

- collective moral purpose & accountability;
 - openness & transparency;
 - expansion & investment of existing schools where possible and relevant – against agreed criteria – as set out in point 4;
 - working with current partners and
 - never knowingly undermining another school.
4. A basic requirement of this strategy is that it ensures the right number of school places to meet pupil's needs, in the right locations, at the time they are needed. Commissioning additional school places at existing schools will therefore be assessed against the following criteria:
- **Net Capacity-** The Education Capital Strategy will wherever possible seek to expand schools in whole forms of entry;
 - **Current performance of school** – Ofsted categorisation / View from Education Improvement. Guidance on school organisation is clear that outcomes should lead to school improvement and increased attainment levels;
 - **The location of the school** relative to the expected pupil need. It is desirable for schools to be at the heart of the community that they serve in order to provide easy access to their facilities by children, young people and their families, and the resident community;¹
 - **Popularity of the school.** The Education Capital Strategy will seek to commission additional places, when needed, at schools with high levels of parental preference in the locality, looking closely at first choices and those schools that are oversubscribed;
 - **Physical ability of the school** to expand including any site or potential planning constraints;
 - **Cost of expansion.** It will be important to ensure that any proposals represent good value for money and are in keeping with available capital funds. All school buildings and estates in the city should be of the highest quality within the resources available;
 - **Diversity of provision.** CCC seeks to maintain or increase levels of diversity and choice for parents wherever possible. In considering school planning, the aim will be to maintain the balance of denominational provision, unless parental preferences via the admissions process provide evidence that change is required.

¹ Education planning areas are used by the LA to assess the supply and demand of school places for local places for local children. Please see attached appendices 1-4 which detail the planning area boundaries and in which planning areas schools are sited. Whilst Education use these areas to plan, there is recognition that the boundaries are not rigid and there is significant movement across these boundaries as parental preference and flexibility changes each year.

- **SEN/ Inclusion.** Wherever possible any school changes should seek to promote greater inclusion for those pupils having SEN and/or disabilities, by providing specialist provision within /linked to mainstream schools or academies. The benefits of this approach are that it; maximises the opportunity for children and young people to be included within their local community, minimises journey times to and from school and makes the optimal use of the revenue funding available to support such individuals or groups and;
- **Governing Body/ Trustees support.** Proposals will normally require careful negotiation with schools and their governors or MAT to align aspirations for development. Where proposals are subject to statutory notice processes, the Education Capital Strategy approach will ensure that all prescribed consultees have the chance to have their say before any decisions are taken by the LA.

Furthermore, the Education Capital Strategy approach is committed to addressing the following areas when expansions and funds permit.

- **Removal of half forms of entry by increasing or decreasing (where appropriate) schools PAN**

In an aim to provide schools with stability when organising classes, half forms of entry will be removed, where possible. A number of schools in the City are operating with half forms of entry (e.g. admit 45 or other multiples of 15) this often requires the school to organise into mixed age classes in order to ensure financial viability. Whilst it is possible to operate in this manner, it can be challenging for teachers and unpopular with parents. CCC consider removal of half forms of entry where possible, particularly through expansion programmes.

- **Increase 1 form of entry (FE) to 2 forms of entry (FE)**

When expansion is required, if possible and appropriate schools will be expanded to 2 (FE) to provide better financial stability.

- **Address safeguarding issues relating to buildings and grounds**

Any safeguarding within schools relating to the school building or grounds will be addressed in a timely manner to ensure the safety of children in Coventry schools. Schools receive Devolved Capital Funding (DFC) to make changes to buildings, they are required to follow a Landlord Consent Process prior to any changes being made.

- **Address buildings defects and Equality Act noncompliance**

Where funds allow, identified defects will be addressed. All school buildings in Coventry should be accessible to all and up to an equal standard.

- **Addressing condition issues particularly those that are unsustainable in terms of energy efficiency**

Collaboration with the Climate change and Sustainability team to address inefficient school buildings and support CCC's Sustainability strategy and One Coventry priorities will take place and recommendations implemented where funds allow.

2 Funding

The provision of additional school places usually requires Capital investment into the school. There are currently several avenues for funding additional school places. This is usually provided as a grant through the DfE or by requesting contributions from new developments. The following section examines the different sources through which funding can be claimed. Education have encountered shortages in specific materials like timber and steel, coupled with a rise in material costs. Education remains actively engaged with project delivery lead personnel and on-site contractors to promptly inform the schools and Academy Trusts. The team is consistently reviewing and updating mitigation steps and plans to address these challenges. These estimated project costs are being seen in tender returns and these have been factored into future project budgets, as detailed below.

• Basic Need Grant funding

Capital allocations to meet projected shortfalls in provision are provided by the Education Skills Funding Agency (ESFA) to all local authorities based on the data provided in the annual School Capacity return (SCAP).² This funding is required to help fulfil Local Authority duty to ensure there are sufficient school places for children and young people in their local area. The level of funding is determined by the demand for school places in the city. This return informs the ESFA of the expected change in pupil numbers over the next few years, the current capacity of schools to meet those numbers and the planned changes to that capacity.

Due to wider pressures and the current spending review, there will be no allocation publication of 26/27 allocation in March 2024 as per the usual three-year anticipation projection.

Year of Allocation	£
Historic Funding Received	14,665,000
19/20 Allocation	3,913,000
20/21 Allocation	6,237,000
21/22 Allocation	23,733,503.95
22/23 Allocation	13,724,521.70
23/24 Allocation	20,175,916.00
24/25 Allocation (announced but not yet received)	275,551.00
25/26 Allocation (announced but not yet received)	0
Total	82,724,492.65

² The forecast pupil numbers methodology for the SCAP return can be found in Appendix 7.

- **Early Years Capital Funding**

The DfE is providing £100m of capital funding nationally in 2023-24 to support local authorities in delivering the expansion of the 30-hours early years entitlement for working families and of wraparound provision in primary schools. Coventry City Council (CCC)'s allocation is £ 530,241.

In Spring 2023 the government announced increased revenue funding in the Early Years sector for early years entitlements for childcare from nine months to 2-year-olds, phased from April 2024. This is in addition to the current offer of up to 30 hours for 3 and 4 year olds, and 15 hours for 2 year olds meeting deprivation criteria. Developer contributions will have a key role to play in helping to fund additional early years places for 0–4-year-olds. Where a development results in housing growth this is assessed and incorporated where applicable, by securing Education contributions via Section 106 for funding of places within existing or new school sites.

Funding	£
2023/2024	530,241

- **Section 106 (S106) funding / Community Infrastructure Levy (CIL) funding**

The SCAP return asks local authorities to provide forecasts of pupil numbers that excludes pupils brought to the area by new housing development, as there is an expectation that provision for these pupils will be funded through contributions provided by the developers. The ESFA expect required education infrastructure, as a result of housing developments to be mitigated by S106 funding/ CIL funding.

CCC will seek to access funding from developers towards providing additional education provision, through the expansion of existing schools or the opening of new schools, when the predicted impact of a new housing development creates a shortfall. With the current and continued demand pressures in education resulting in rising cohorts in Primary, Secondary, post-16 and SEN (all phases) Education will continue to evidence their position in terms of the contribution levels requested.

The Coventry Local Plan 2011-2031 has followed a period of public examination and consultation on proposed modifications. As highlighted new housing developments can create additional demand for existing and new education facilities. The housing within the Local Plan is estimated to lead to over 13,200 additional children across all age ranges. There are also significant numbers of housing developments receiving planning permission outside the Local Plan process, which are already beginning to impact on local schools. Coventry do not request developer contributions on one-bedroom dwellings, as they are

unlikely to generate either nursery, primary, secondary or sixth form pupils. The Education team are notified of all Coventry planning applications, and assess the development make-up; any 2+ bedroom dwellings that are not deemed for student or care home provision will be assessed and responded to within the statutory 14-day consultation period.

Where new housing development creates additional demand for school places, CCC will work with developers to ensure that the appropriate contributions for the provision of additional school places are given. Where a housing development yields many numbers of pupils and justifies new provision, it may be necessary to secure land. The land would be used for education purposes, to safeguard CCC's statutory responsibility to provide sufficient school places.

This will continue to be achieved through Section 106 agreements. Education will seek the maximum contribution from developers to support the provision of additional places proportionate to the impact of the development. Section 106 also includes asking for Primary and Secondary SEN contributions to aid in commissioning additional special school places because of the development. Contributions are requested fairly based on their proximity to the development, all education types are considered and some rounding within the pupil yield calculation may see an additional place be requested when rounded up to the nearest whole pupil place.³

From September 2019, the pupil yield figures for Coventry are follows:

	Primary	Secondary	Sixth Form	Primary SEND	Secondary SEND	Early Years
Pupils generated per 1 eligible dwelling	0.39	0.23	0.04	0.01	0.01	0.08
Pupils generated per 100 eligible dwelling	40	24	4	1	1	8

The pupil yield methodology for how these figures have been calculated is included in appendix 2.⁴

- **Special Provision Fund (2018 – 2021)**

Coventry received an allocation of c£3.9 million funding. This was allocated in multiple tranches across several years. This funding has been utilized or allocated.

- **High Needs Provision Capital Allocation –**

³ The methodology for the pupil yield calculation is included in appendix 2.

⁴ These figures have been rounded to two decimal places. Rounding is to 2 decimal places and across multiple formula, so this in turn can add an additional pupil once these rounding's are factored into the nearest whole pupil place.

Announced in November 2020 as a National allocation for 2021-24 for new school places for children with special educational needs and disabilities, CCC were allocated £15,573,500. The final tranche will be announced in March 2024.

3 Providing School Places

Additional school places are provided through either existing school expansions or providing new schools.

3.1 School expansions

Where a predicted shortfall of places has been identified, the most common solution is to expand an existing school. All schools in the area will be consulted with and the most cost-effective way forward after considering expansion opportunities available within various school sites and costs, will be proposed.

There are several factors taken into consideration as set out below:

Criteria		How is this Measured	Source
1	Access – Serving Area of Need	Pupil number forecasts.	Education
		Locality of schools in relation to demand.	Education
		Long term planning applications in the adjoining area.	Planning Team / Education
		Proposed admission arrangements.	Education
2	Suitability of site and buildings for expansion	Net capacity of schools.	Property Information Team/ Academies
		Size of site	Property Information Team
		Capacity of existing M&E to accommodate expansion requirements.	Property Information Team / School
		Planning issues including highways and transport impact.	Highways / Other
		Potential for the site to bring investment that would support the development.	Education
		Barriers to expansion including listed buildings, grant funding conditions, third-party impact.	Education
3	Leadership capacity & Quality of provision	Demonstrable commitment to making maximum use of the existing school buildings.	School
		OFSTED reports.	Education
		School position in terms of pupil attainment.	Education
		Capacity to maintain standards and manage change during build programme.	Education / School

4	Consequential impact of project	Impact on pupil numbers at other local provision.	Education
		Potential for expansion project to improve condition need of existing buildings within funding envelope.	Property Information Team
		Current number of forms of entry.	Education
		Early Years provision.	Education

3.2 New schools

When there are no opportunities to expand existing local schools, or where new housing developments are expected to bring large numbers of new families to an area or where no existing provision can accommodate the influx of people into the city then a new school will be required.

When the need to establish a new school arises, there is a presumption in law that these schools will be Free Schools. The role of the local authority (LA) is to identify a site for the school and to seek applications to run the new school from potential sponsors. The final decision on who should sponsor a new school is taken by the Regional Schools Director (RSD), whilst the RSD now has a requirement to consult with the LA on any new free school proposal, the overall decision is outside of local authority control.

It is the responsibility of the LA to seek sponsors for these new schools, therefore if a new school is required, the local authority would look to engage with potential suitable organisations including existing high-quality providers within Coventry. Coventry City Council (CCC) will work collaboratively with the ESFA and office of the Regional Schools Commissioner and other external providers if new school(s) are required.

To ensure an adequate number of Early Years places and SEND provision throughout Coventry, all newly built schools will be equipped with facilities for Early Years and Special Educational Needs (SEN) provision as suitable for their phase of education.

Education have secured two parcels of land within Coventry for new primary schools. These sites are required, as despite the reduced birth rate, the number of homes within the local plan and with approved planning permission will increase demand within the local area. These Primary school sites will only be brought online in conjunction with the housing developments and the occupation of these homes.

In 2018, a planning application was submitted for a significant housing development as part of the Eastern Green Sustainable Urban Extension. All 3,300 homes have now been approved; CCC has secured land to allow the building of up to a 3FE Primary School (2.7

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hectares of land). CCC will have 15 years from the date the site is transferred to the Council to construct and open the Primary School. The neighbouring schools to this securing land are St Andrews Infant and Eastern Green Junior; the only remaining infant and junior schools within the city. This housing development provides the opportunity for both to schools to extend their age range to become all-through Primary Schools. Education would look to engage a move of St Andrews from its current site to the new location, extending to a full Reception to Year 6 cohort, whilst simultaneously working with Eastern Green Junior to expand their current provision to a full Reception to Year 6 cohort. In line with the proposed buildout rate of the housing development, this move is currently programmed to occur in 2029.

The other parcel of land relates to the planned development in the Keresley area of Coventry, with the building of 3000 homes as part of the Sustainable Urban Expansion. This will also create additional demand and the need to secure land to provide Primary education. There is potential for a nearby existing Coventry primary school to relocate and expand on to this site. This primary site has been secured for 5 years from transfer to the Council, which is likely to take place in 2024, which would mean that the use of the site would be required by 2029.

Due to the unknown level of in-year migration over the longer term, and subsequent impact across primary and secondary sufficiency, there may be a requirement to for additional land for secondary or SEND provision. This is being monitored as part of the sufficiency requirement and sites for education use are being explored.

4 Coventry Context

4.1 Schools

In Coventry there are currently 85 primary, 21 Secondary, 8 Special, and 1 All-Through schools and 2 further education Colleges. The status of these schools is as follows:⁵

School Type	In process	Maintained	Free Schools	Voluntary Controlled Schools	Voluntary Aided Schools	Academies	Total (all schools of type in county)
All-Through Mainstream	0	0	1	0	0	0	1

⁵ Please note information correct as of the 02/12/2022.

Colleges	0	2	0	0	0	0	2
Primary Mainstream	2	40	1	2	6	33	85
Secondary Mainstream	0	0	3	0	0	18	21
Special	4	1	0	0	0	3	8
Pupil Referral Unit	1	1	0	0	0	0	2
							119

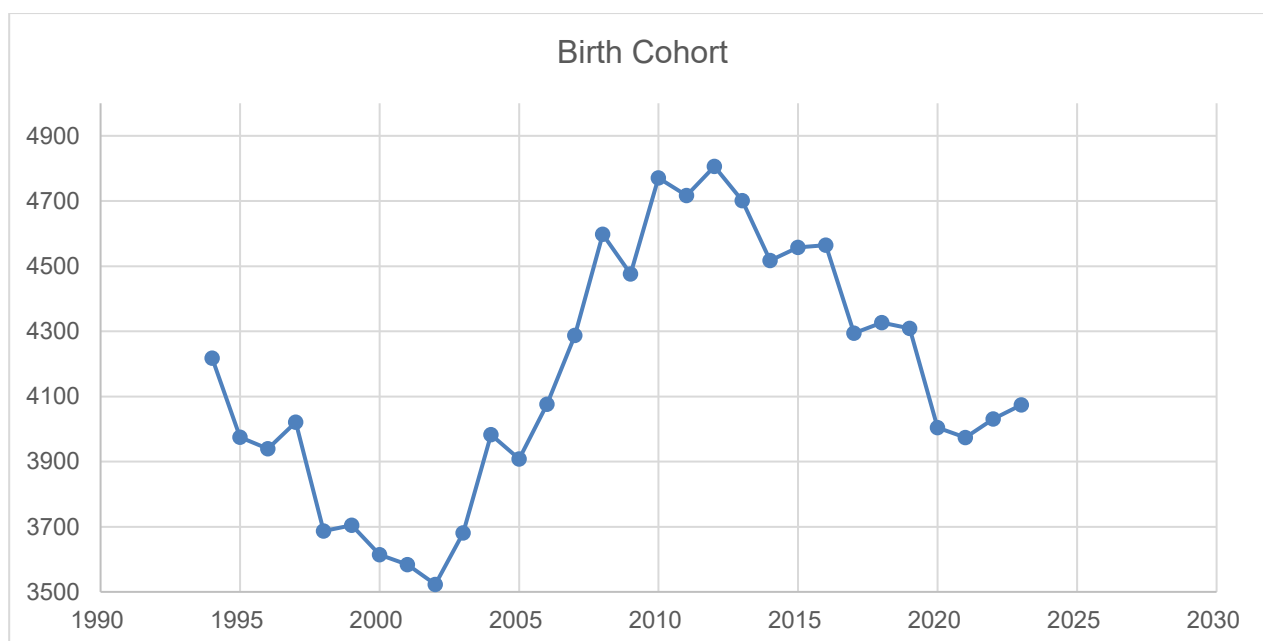
Proposals for a school to academise are covered under the Academies Act 2010. When a school becomes an academy, it ceases to be maintained by Coventry City Council (CCC). CCC is, therefore, required⁶ to either transfer the freehold of the school site or grant a 125-year long lease at a peppercorn rental for the land and/or buildings within its ownership that has been wholly or mainly used for the purposes of the school.

CCC charge schools for the work Officers undertake in relation to the academy conversion, refer to table of charges below:

Invoice item	Amount
Conversion fees for Finance Service	£2,000
Conversion fees for Legal Service	£3,900
Conversion fees for Capital Strategy Service	£1,015
Conversion fees for HR Service	£1,200
Total	£8,115

4.2 Population Context

⁶ under Schedule 1 of the 2010 Act (as amended by Schedule 14 of the Education Act 2011 ("the 2011 Act"))



The table above shows the birth cohort in Coventry and the declining position since 2012. Over the past 4 years the birth rate has stopped declining and stabilised. Given the transient nature of a city's population and the social mobility of its residents, updates to birth and GP registration data are shared quarterly by Health. This enables Coventry City Council (CCC) to track pre-school cohorts and their movement within the city. The purpose of this thorough tracking is to ensure the availability of sufficient places in primary schools.

The latest data gives us some key headlines:

- The birth cohort peaked for entry into Reception in September 2016 and, with the existing housing stock considered, has begun to re-stabilise and in some areas of the city started to decrease. Although future developments within the local plan may lead to a future rise in birth rates in the specified locations.
- The current Year 6 is the largest cohort currently in Coventry Primary schools, September 2024 entry to Secondary, and will severely impact upon the availability of places within the city.
- The increase in 'in-year' applications as a result of new arrivals into the city, has caused many schools to reach full capacity and in several year groups some schools have been required to go over PAN to accommodate more students who are 'unplaced'.

Coventry has experienced significant changes in its pupil demographics over the past 2 years, its total school cohort increasing from 58,496 in Jan 2022 to 60,749 in October 2023.

This increase is against a background of a falling birth rate meaning that one of the main drivers for this change in pupil demographics is because of in-year migration from new arrivals to Coventry (from either overseas or other parts of the country). Below outlines the total increase in the number of applications received by the School Admissions Team.

Primary School Transfers	Total Applications Made	Secondary School	Total Applications Made
01/09/2018 - 31/08/2019	1255	01/09/2018 - 31/08/2019	1267
01/09/2019 - 31/08/2020	1454	01/09/2019 - 31/08/2020	1117
01/09/2020 - 31/08/2021	2243	01/09/2020 - 31/08/2021	1399
01/09/2021 - 31/08/2022	3124	01/09/2021 - 31/08/2022	1794
01/09/2022 - 31/08/2023	3730	01/09/2022 - 31/08/2023	1849
01/09/2023 – 15/11/2023	959	01/09/2023 – 15/11/2023	530

The trend of growth is across Primary and Secondary, but it has been the primary sector where most substantial growth has been seen. The increased number of in-year applications over the past 18 months has significantly reduced the number of school places available in Coventry schools.

To address this unexpected issue pupil number forecasts have been adapted to include higher levels of in-year migration and ensure adequate school place provision across the city by implementing additional classes (temporary and permanent) to create additional learning spaces without overburdening schools or compromising the quality of education. Education uses data-driven approaches by keeping track of number of pupils on roll, analysing demographic trends and forecasting to continuously monitor the availability of spaces in various schools. This proactive approach aims to balance the need for additional places with preventing an oversupply of vacant places across schools within the city which can impact school sustainability.

5. Early Years

In line with its statutory duties under the Childcare Act 2006 and 2016, Coventry City Council (CCC) is required to regularly complete a Childcare Sufficiency Assessment to monitor supply and demand of childcare provision within the city. This assessment is a measurement of provision type, quantity, supply, and demand within each of the Coventry wards. The most current assessment can be accessed [here](https://www.coventry.gov.uk/downloads/file/31990/coventry-childcare-sufficiency-assessment-2022-2023): <https://www.coventry.gov.uk/downloads/file/31990/coventry-childcare-sufficiency-assessment-2022-2023>. The purpose of the assessment is to identify current gaps in the childcare market and propose recommendations to address these.

Section 6 of the 2006 Act places a duty on Local Authorities to *secure, so far as is “reasonably practicable”*, a sufficient amount of childcare places to meet the needs of working parents, those studying to work and to secure prescribed early years provision free of charge.

The provision of early years’ education and childcare in Coventry is provided by

- one maintained nursery school
- school nursery classes
- early years provision run by schools on site (in addition to nursery class)
- private, voluntary and independent settings (PVI) which include childminders, preschools, day nurseries, out of school provision and holiday schemes.

	Childcare on non-domestic premises	Childminders	Schools with Nursery Class and or Governor lead early years provision	Out of school provision inc. breakfast club	Holiday schemes	Independent school sites offering early years places
Number of settings	85	190	70	83	28	3
Number of places	4370	1248	3,019	n/a	n/a	81

In summary, early years and childcare places in Coventry continue to meet parental demand and the Ofsted quality profile of providers continues to remain high.

The COVID 19 Pandemic 2020- 2022 impacted on a change in the childcare landscape. The childcare needs of parents in Coventry began to change resulting in a reduction in the number of childcare hours required by parents, as employers began to accommodate more flexible working arrangements for example, working from home and amended working patterns.

In order to achieve participation targets for Early Education Entitlement Funded places (EEF) and support Coventry children to achieve a good level of development at the end of the Foundation Stage, the following points form the basis of the Early Years: Business, Sufficiency and Funding team priorities:

- increase capacity of childcare places in Coventry in line with the introduction of extended entitlements for children under 5 years and wraparound provision for Primary aged school children (Reception – year 6) to support the growth of employment in Coventry

- ensuring that as part of the childcare expansion there are sufficient places for children with SEND
- as part of the new reforms explore the demand and take up of wraparound provision for primary aged pupils to inform targeted actions in specific areas of the city
- consider required childcare and early year's provision to respond to need through migration, birth rate increase/decrease, or when new housing is planned
- consider opportunities for Section 106 funding to support capacity development (contributions from developers towards the costs of providing community and social infrastructure which are required because of new development taking place)
- ensure parents are aware of the support available to them to reduce the cost of childcare including Tax-Free Childcare (TFC) and Universal Credit childcare support. Encourage childcare providers to register to deliver Tax Free Childcare. Work with employers and Job Centre Plus to ensure working parents and those moving into employment are aware of support to meet the costs of childcare, flexibility options and to promote childcare vacancies locally, to support parental choice
- support partnership working across different provider types (schools, childminders, preschools and day nurseries) to offer sustainable models of delivery, including provision across the school holidays. With the aim of ensuring parents have access to flexible and stretched provision, and providers can maximise occupancy to ensure sustainability of provision
- continue to promote the take-up of all EEF places. Support opportunities for providers to maximise the number of places delivered across all funded entitlements and access Early Years Pupil Premium (EYPP) and Disability Access Fund (DAF) for eligible children in order to protect sustainability of provision
- drive workforce development improvements within the sector, and promotion of childminding as a profession to address growth in services and the decreasing interest in childcare as a career choice within the sector
- work with partners and key stakeholders to increase the take up of childcare places so that children enter education as early as possible. Helping to reduce levels of inequality and narrow the educational gap between those most disadvantaged and their peers.
- monitor quality improvement of Ofsted outcomes to ensure the availability of sufficient, high-quality childcare.

Demographic changes have altered the sufficiency position for both early years and reception school places in recent years. Historically, circa 95% of pupils born within the city would go on to attend a Coventry primary school, with the remainder choosing to attend a school within a neighbouring authority, Private Education, or moving out of Coventry prior

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to reception. Recent increases in in-year migration means that an increasing number of pre-school pupils are attending Coventry schools. September 2023 being the first year (in this 20-year tracking) where the number of children attending a primary school is larger than the relevant birth cohort from 4 years previously. The birth cohort being increased in size by in year migration from families with pre-school children. See table below for example. If this trend were continued then it is anticipated that Coventry will be allocating 105% of its birth cohort a school place, or a swing of 450 extra pupils per year group.

Year ending 31 st August of Births	Number of Births	Year of Entry to Primary School	Number of Children attending from 1 st September	% of birth cohort who attended primary school
2014	4517	2018	4337	96.0%
2015	4557	2019	4322	94.8%
2016	4564	2020	4303	94.3%
2017	4294	2021	4170	97.1%
2018	4327	2022	4298	99.3%
2019	4309	2023	4361	101.2%

6 Primary Education

Primary schools in Coventry have undergone a series of expansion within the last 20 years, although in the last 5 years they have not required further expansion due to birth rate change. As the population of the city increases due to migration by families with school-aged children; this is driving a rise in demand for primary school places. Coventry City Council (CCC) has a good track record of delivering additional primary places. The vast majority of these have been OFSTED rated 'good' or 'outstanding' schools.

The start of the primary school expansions dates to 2008, commencing with Phase One, an expansion endeavour that introduced 37.3 FE permanent classrooms, creating an additional 1120 Reception places for children. Phase Two from 2017 sought to strategically address the declining birth rate within relevant areas of the city. This reduction prompted a re-evaluation of pupil admission number (PAN) in primary schools, with certain schools adjusting their PAN to respond and enable more efficient school organisation.

Year of PAN reduction	West Central	Longford	East	South	North East	East Central	Coundon	North Central	Binley
2018	Spon Gate (60 to 30)	Little Heath (60 to 30)							St Bartholomew's (60 to 30)
2019						Frederick Bird (120 to 90)			

2020			Richard Lee (90 to 60)				Coundon (90 to 60)	John Gulson (90 to 60)	
2021		Alderman's Green (90 to 60)		St Thomas More (60 to 30)	Whittle Academy (45 to 30)				
2022								Hill Farm (90 to 60)	
2023				Howes (30 to 15)				St Augustine's (60 to 30)	

*The above table does not include schools that reduced and increased in a subsequent year.

This phase lasted until 2023 when the changing demographics as described throughout have led to an increased demand for school places. Phase Three will span from 2023 to 2026 and is aimed at expanding places in select primary schools in partnership with the primary school sector. To date, this expansion has resulted in the addition of 7 new temporary classes at Moseley Primary School, Moat House Primary, and Frederick Bird Primary School. The rising demand, which is particularly acute in Years 1-5, will require future projects and these will prioritize expanding capacity to meet the growing demand in the wake of demographic shifts and increased migration as and when the additional places are needed.

7 Secondary Education

Since 2018 there has already been a significant transformation programme in place to increase capacity to address the increased birth cohorts that are moving through the system. To address the rapid growth and meet the need for additional provisions in secondary schools, a strategic decision was made to expand secondary schools through a blend of temporary (bulge) and permanent expansion projects. Temporary expansions, such as modular buildings, offer a quick and adaptable solution to cater to immediate requirements while permanent expansions involve infrastructure development which provides a lasting solution to meet the evolving needs of education.

The recent demographic pressure as described above means a larger cohort of pupils are transitioning from primary provision to secondary provision impacting the overall capacity of secondary schools within the city, which was already fuller due to the highest birth rate cohort of 2012 now being in the first year of secondary (year 7). As set out below, Phase One was presented to Cabinet in October 2018 and outlines the planned temporary and permanent increases up to 2021. To address the further forecast shortfall of places between 2022 and 2024, Phase Two outlines the agreement between the CCC and the Coventry Secondary Headteacher Partnership to meet the additional places required.

Phase Three will cover the years 2024-2027 and is in response to additional pupils from in-year applications. Due to the more transient nature of in-year increase Phase 3 this will continue to be reviewed annually in line with updated pupil forecasts.

All schools are required to consult as part of the expansion programme.

Phase One

Covering years 2018 to 2021, addressed the insufficiency of school places across existing secondary schools. A total of 1,590 were added through a combination of temporary (bulge) and permanent classroom expansions in year 7 places within existing Coventry schools. It demonstrated an approach of flexibility, adaptability, and foresight, ensuring that the Education could respond effectively to the additional pupils rising from in-year applications.

Phase Two

Phase One of the capital programme will meet demand covering years 2022 to 2024, phase two⁷ addresses the forecast shortfall of places and provides a sufficient surplus of places city-wide, including the following requirement for additional temporary places/bulge classes.

Adjustments have been made to 2024 due to the increase in demand of school places. Consequently, the revised plan for 2024 now involves an expansion from 6 FE to 10FE.

- In September 2022, an additional 7 forms of entry (210 year 7 places) have been added.
- In September 2023, an additional 10 forms of entry (300 year 7 places) have been added.
- In September 2024, an additional 10 forms of entry (300 year 7 places) will be needed.

Phase Three

The implementation of Phase One and Phase Two has successfully addressed the initial demand for school places. However, due to the unforeseen increase in in-year applications for school places, development, and introduction of a Phase Three has been necessary. This will effectively manage and assist with the increased demand for school places.

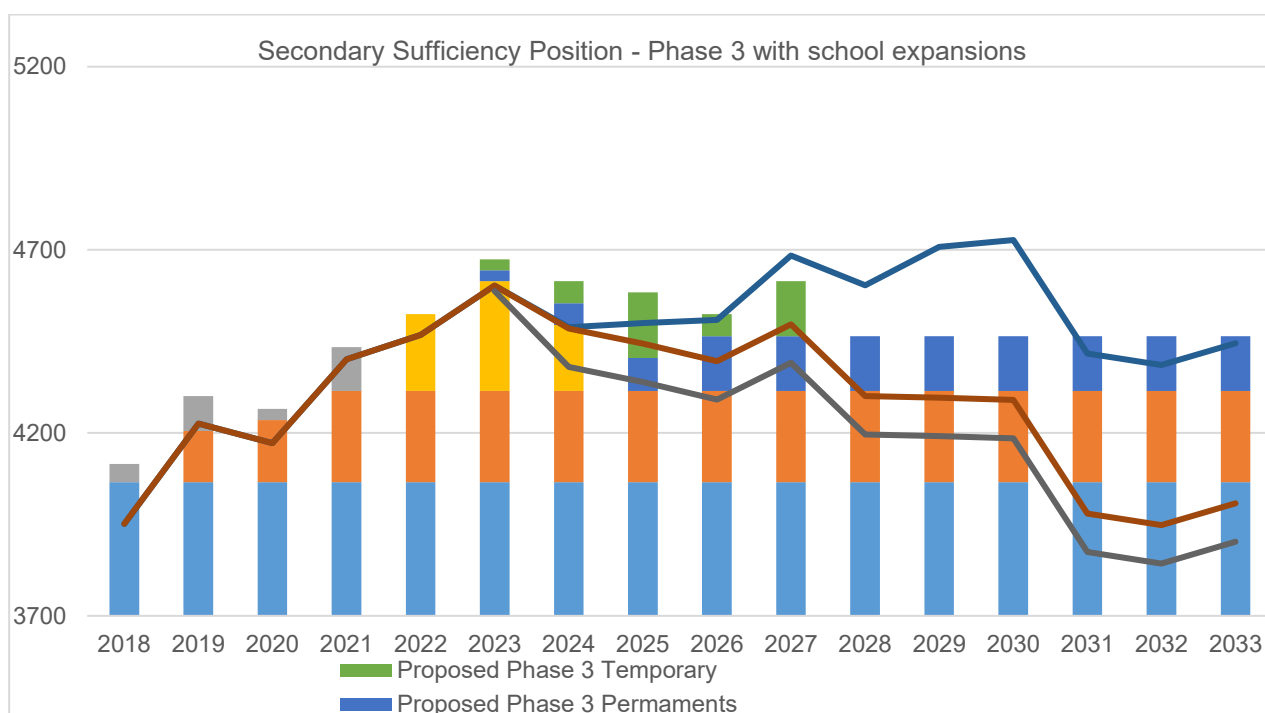
The proposed phase three covers the years 2024-2027 and will offer a flexible and adaptive approach to address the dynamic nature of the pressures faced. In the circumstances that there is an increase or decrease in school place demand, the expansion plan can be increased to accommodate additional demand or scaled down to avoid surplus places in the secondary schools if demand decreases.

⁷ This is in addition to the agreed expansions for 2019 – 2021 (Phase One).

- In September 2025, 4 permanent classes and 5 temporary classes will be needed.
- In September 2026, 2 temporary classes will be needed.
- In September 2027, 5 temporary classes will be needed.

The graph below indicates the following:

- The forecast of secondary school students on roll, considering the continuation of in-year applications for both a period of one year and indefinitely. The difference between these two situations shows a continuous increasing trend if in-year applications continue.
- The number of pupils on roll exceeds the PAN of schools which can be noticeable mostly in post-Year 6 and 7 transfer.
- The expansions undertaken in phases 1 and 2 were implemented to tackle the increase in the demand for school places largely as a result of birth rate increase; the proposed phase 3 expansion is to address the continued increase in demand due to increases in in-year admissions.
- It is expected that phase 3 will largely reutilise provision expanded in phases 1 and 2.



8 Special Education Needs Provision

The Special Educational Needs & Disability (SEND) School Place Planning Strategy is being developed to respond to increased demand. It sets the baseline for specialist provision across the city and summarises a range of factors that are driving the need for change over the short to medium term.

- In Coventry, 19.2% of pupils have an Education, Health & Care (EHC) Plan or are receiving SEN support (previously school action and school action plus). This compares to an average of 17.3% across all local authorities in the West Midlands, and an average of 16.5% nationally.
- In the West Midlands, the proportion of school age pupils with EHCP's range from 3.4% to 4.9%. Coventry has 3.4% compared to an average of 4.0% in all local authorities in the West Midlands, and 4.4% nationally.
- For SEN support, the proportion for all local authorities in West Midlands ranges from 11.8% to 15.8%. Coventry has 15.8%, compared to an average of 13.7% in all local authorities in the West Midlands.

This strategy gives more in-depth information regarding the current and future SEND pupil population and outlines the options available to add or make changes to specialist provision for Coventry pupils. This strategy will provide a basis against which future specialist provision will be planned.

The Strategy sets out:

- Review and further development of enhanced resourced provision (ERP), which will lead to a range of ERP bases across primary and possibly secondary phase that reflects current priority areas of need including ASC (Autistic Spectrum Condition), Learning Difficulty, and SEMH (Social, Emotional, and Mental Health).
- Prioritisation of the current special school estate to develop where possible within the available capital funds. Explore, where possible and advantageous, the opportunity to move, expand and/or rebuild special schools on alternative sites.

Context

There has been a 50% growth in the number of EHC plans maintained by Coventry over the last five years (see table below). This is in line with national increases in demand. If this rate of growth continues for the next five years, it is forecast for Coventry to maintain

just over 4000 EHCP plans by 2027. This level of growth is more than the mainstream population growth, so a higher proportion of children within Coventry have identified additional needs than in previous years.

Date	EHCP's	% increase on previous year
Jan-16	1,559	
Jan-17	1,724	10.58%
Jan-18	1,863	8.06%
Jan-19	2,084	11.86%
Jan-20	2,145	2.93%
Jan-21	2,350	9.56%
Jan-22	2,587	10.09%
Jan-23	2,714	9.77%
Jan-24	3,117	9.77% (projection)
Jan-25	3,393	8.85% (projection)
Jan-26	3,693	8.85% (projection)
Jan-27	4,021	8.85% (projection)

Table: Annual growth of EHC Plans

These forecasts factor in previous trends which may have been an impact of national strategy reform, covid and pandemic impact. This is being monitored closely to evaluate if forecast accurately represent the position moving forwards.

Current School Estate

Specialist SEND Provision located in Coventry is comprised of 8 special schools: five maintained special schools and three special academies.

The 8 schools are outlined in more detail below:

School	Description
Castle Wood Special School	For pupils aged from 4 -11 with a range of learning difficulties from profound and multiple, severe to moderate and with varying degrees of autistic spectrum conditions.
Baginton Fields	For pupils aged from 11-18 with a broad range of special educational need and disability, Autism, Sensory Impairment, Physical Disability, Communication Difficulties and Challenging Behaviours.
Corley Centre	For pupils aged from 11-18 with complex social and communication difficulties.

Sherbourne Fields	For pupils aged from 2-19 with a broad spectrum of need including physical disabilities, medical conditions and learning needs.
Tiverton	For pupils aged from 3-11 with severe learning difficulties or profound and multiple learning difficulties. They may also have some physical or sensory impairment, or an autistic spectrum disorder.
Woodfield	Based across two sites, a Primary for pupils aged 4-11 and a Secondary for pupils aged 11-16 (and support until the age of 18). Many of the pupils needs range from dyslexia, dyspraxia, being on the Autistic Spectrum (ASC), or having Attention Deficit Hyperactive Disorder (ADHD), Pathological Demand Avoidance (PDA) and attachment difficulties.
Kingsbury Academy	For pupils aged 4-11 with learning difficulties and additional needs, with over half of the pupils having autism spectrum conditions (ASC) and others have additional needs, including sensory impairment, communication difficulties and physical difficulties.
Riverbank	For pupils aged 11-19 with a broad range of special educational need and disability. Learning is influenced by Autism, Moderate and Severe Learning disabilities, Sensory Impairment, Physical and medical difficulties, Communication Difficulties and Social, Emotional and Mental Health difficulties linked with their special educational needs.

Growth in Coventry special school placements.

In the last five years a programme of capital works to expand existing special school provision has enabled a 40% rise in the commissioned numbers across all of Coventry's special schools (see table below). The number of pupils in special schools has increased, but the percentage of pupils with an EHC plan aged 5-19 years attending Coventry state-funded special schools has been narrowly declining over the years. In September 2020 the proportion of CYP in Coventry special schools were 53.5%, reducing to 51.7% in September 2021 and 51.1% in September 2022. This mirrors national trends with more children with SEND placed in mainstream settings.

Special School	Specialism	23/24	22/23	21/22	20/21	19/20	18/19	17/18
Castlewood	BS	160	160	160	156	139	136	128
Kingsbury	BS	101	100	92	84	84	84	81
Riverbank	BS	200	200	188	164	164	158	150
Corley	ASD	140	129	129	118	96	88	88

Tiverton	BS	118	112	110	95	74	60	42
Baginton	BS	126	118	116	116	100	100	100
Sherbourne	BS	251	240	220	158	148	139	135
Woodfield	SEMH	155	155	155	152	160	144	144
	Total	1,251	1,214	1,170	1057	961	909	868

Table: Growth in special school commissioned numbers between 17/18 and 23/24

Projected five-year Growth in Special Schools:

The 5 year forecasts are split by type of SEND need and broken down by year. As the table below demonstrates, there is a rising demand across all types of placements, with a particular demand for Broad Spectrum and SEMH.

These forecasts factor in previous trends which may have been an impact of national strategy reform, covid and pandemic impact. This is being monitored closely to evaluate if forecast accurately represent the position moving forwards.

	23/24	24/25	25/26	26/27	27/28
Primary Phase Broad Spectrum Placement	43	64	95	144	201
Secondary Phase Broad Spectrum Placement	36	64	85	98	114
Secondary Phase Autistic Placements	16	26	41	55	75
Primary Phase Social, Emotional, & Mental Health	9	18	29	42	57
Secondary Phase Social, Emotional, & Mental Health	15	26	37	48	65

Future need

Primary

The number of pupils in primary mainstream with additional needs has also been rising. Schools receive funding through a banded model to support pupils with additional needs in their settings. It is proposed to create several resourced provision units on mainstream school sites making use of existing education assets to respond to increases in demand. These will be commissioned units and will be targeted towards primary age pupils with

Autism Spectrum Condition and Social, Emotional and Mental Health (SEMH), and Learning difficulty.

Specialist provision attached to mainstream schools can support the complex needs of learners within their own communities. Coventry has developed a model of provision based on best practice and experience, both internally and that of other local authorities.

It is predicted that an additional 3-5 resourced provision per year would be required over the planned period, assuming a population of 8-12 pupils per provision. It is estimated that this would cost circa. £500k (capital investment) per resource provision, but this may vary dependent on existing site and buildings. Work is underway to identify areas of the city where education provision will be released and can be utilised for this purpose.

Secondary

Woodfield Special School (all-through school) is in the process of relocation and expansion at the former Woodlands site. This will create an additional 104 SEMH places across both primary and secondary phases. These additional places will be available from September 2025.

Projects are in feasibility stage at Sherbourne Fields and Baginton Special Schools to provide additional places. These projects could provide an additional 80 places across the secondary phase of education for a wide range of pupils with an EHCP.

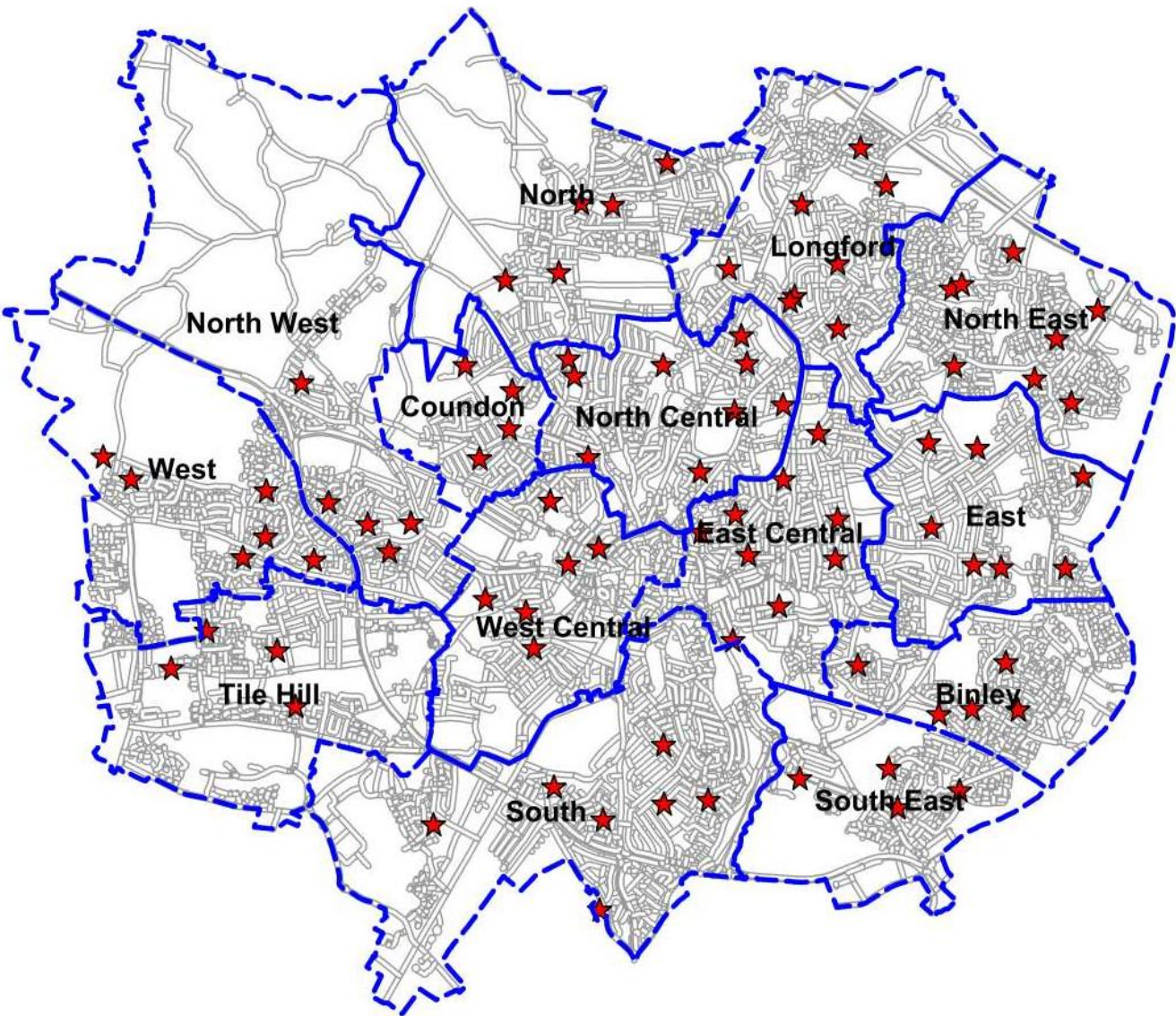
Due to the rising demand for specialist school placements, it is likely that further expansion within existing Coventry Special Schools will be required. Consultation has been undertaken with Special School Headteachers to explore opportunities.

Post 16

Secondary special school provisions have seen an increase in the level of post 16 provision required as a consequence of growth. As part of secondary mainstream expansion, partnerships with colleges and employment pathways including supported internships are being developed for an extended SEND post 16 provision.

Appendices

Appendix 1 - Primary Planning Areas

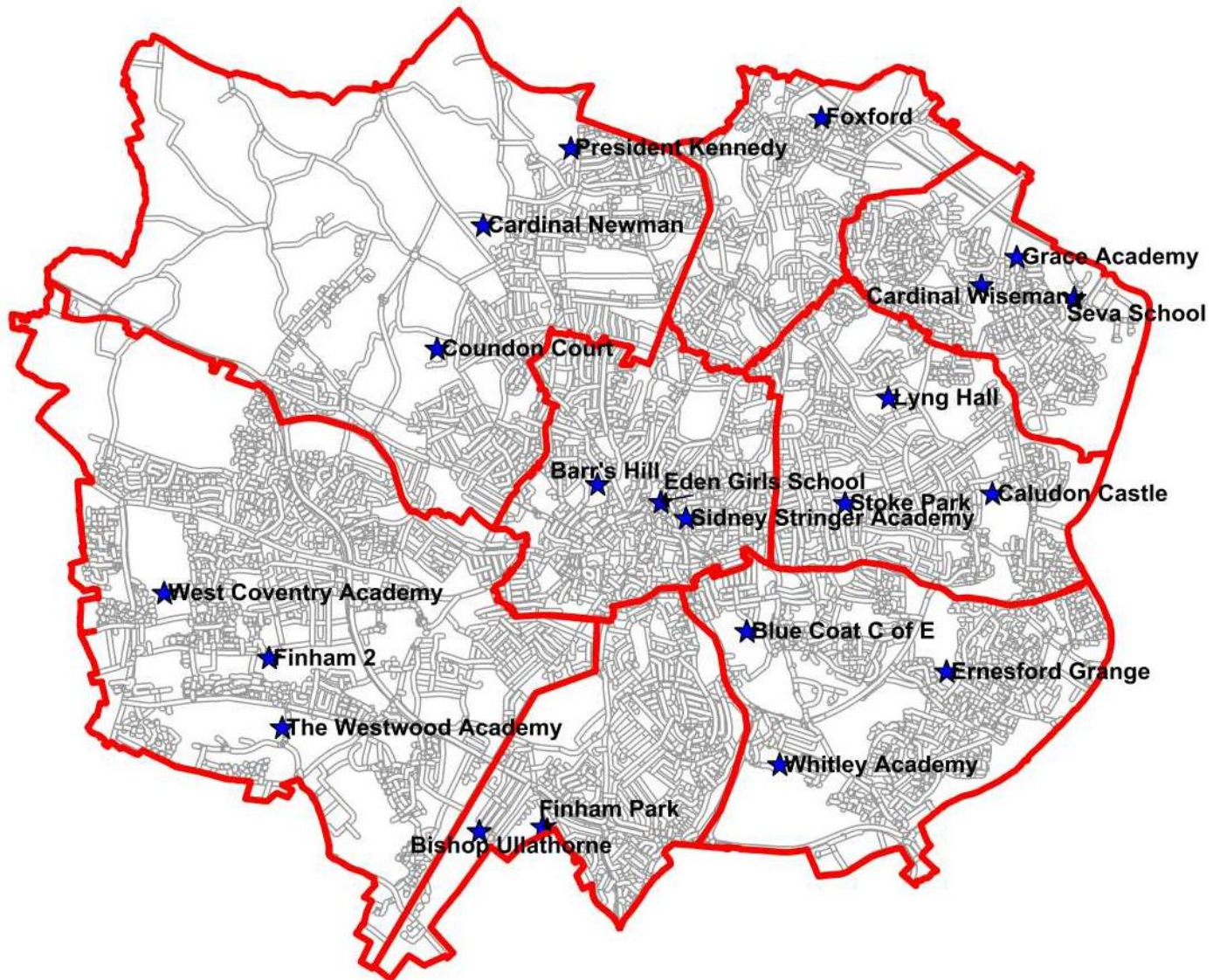


Primary Planning Area	School
<u>North</u>	Holy Family Catholic
	John Shelton
	Parkgate Academy
	Whitmore Park
	Keresley Grange

<u>North Central</u>	Broad Heath
	Edgewick
	Hill Farm Academy
	Stanton Bridge
	Joseph Cash
	St Augustine's Catholic
	John Gulson
	Radford Academy
	St Elizabeth's Catholic
<u>East Central</u>	All Saints' CE
	Frederick Bird
	Gosford Park
	Stoke
	Stoke Heath
	Sacred Heart Catholic
	St Mary & St Benedict Catholic
	Sidney Stringer Academy
	Southfields
<u>West Central</u>	All Souls' Catholic
	Earlsdon
	Hearsall Academy
	Moseley
	St Osburg's Catholic
	Spon Gate
<u>Longford</u>	Alderman's Green
	Courthouse Green Academy
	Grangehurst
	Good Shepherd Catholic Academy
	Holbrook
	Little Heath
	Longford Park
	St Laurence's CE Academy
<u>North East</u>	Henley Green
	Moat House
	Potters Green
	SEVA (Free)
	Whittle
	SS Peter & Paul Catholic
	Walsgrave
	St Patricks Catholic
<u>East</u>	Wyken Croft

	John Fisher Catholic
	Clifford Bridge
	Pearl Hyde
	Ravensdale
	Richard Lee
	St Gregory's Catholic
<u>Binley</u>	Aldermoor Farm
	Ernesford Grange
	St Bartholomew's
	Sowe Valley
	Corpus Christi
<u>South East</u>	St Anne's Catholic
	Stretton CE
	Whitley Abbey
	Willenhall
<u>South</u>	Finham
	Grange Farm
	Howes
	Manor Park
	St Thomas More Catholic
	Stivichall
	Cannon Park
<u>Tile Hill</u>	Templars
	Our Lady of the Assumption Catholic
	Leigh
	Charter
<u>West</u>	Eastern Green Junior
	Limbrick Wood
	Mount Nod
	Park Hill
	St Andrew's Infant
	St John Vianney
<u>North West</u>	Allesley
	Allesley Hall
	St Christopher
	St John CE
	Whoberley Hall
<u>Coundon</u>	Christ the King
	Coundon
	Hollyfast

Appendix 2 – Secondary Planning Areas



Appendix 3 - Education Pupil Yield Methodology

There are two main factors to the contribution's requests, firstly the cost per pupil (Cost Multiplier) which is a Department for Education (DfE) stated amount for Coventry, and secondly the pupil yield anticipated from the development. CCC request contributions,

where required, for Early Years (EY), Primary, Secondary, Sixth Form, and Primary, and Secondary SEN. These requests are in line with changes in Government policy including the funded two-year-olds EY policy with a new entitlement from April 2024, 30 Hrs as of September 2017, nine months to 2 year old funding from September 2024 and the raising of the participation age to 18; as well as ensuring Coventry matches its neighbouring local authorities in terms of level of request.

The way in which Education select schools to secure contributions towards expanding school places, as part of the Section 106 process, is determined by the following criteria:

- Good value for money
- Ensure contributions requested align with CCC's One Strategic Plan and its ongoing programmes
- Select schools close to the development where possible, but must also factor in localised areas of pressure City wide
- All schools are selected equally and fairly

Education do not ask for contributions for one-bedroom dwellings as they are unlikely to generate either primary, secondary or sixth form pupils. For this reason, Education calculates the pupil yield from dwellings which are designed for familial occupation, i.e., 2 bed dwellings and above. Furthermore, a majority of the one bed dwellings within the city are occupied by and designated for use by students and so familial occupation would not occur.

This will continue to be achieved through Section 106 agreements. Education will seek the maximum contribution from developers to support the provision of additional places that is proportionate to the impact of the development. It is critical that developers make a financial contribution to school places, as, without it, CCC will be unable to deliver the required provision. Section 106 also includes asking for Primary and Secondary SEN contributions to aid in commissioning additional special school places as a result of the development. Contributions are requested fairly based on their proximity to the development, all education types are equally considered and some rounding within the pupil yield calculation may see an additional place be requested when rounded up to the nearest whole pupil place.

Cost Multiplier

There is no nationwide funding formula for Early Years provision, however there is guidance based on the amount of floor space that an Early Years child will need, based on age of the child. Providers must meet the following indoor space requirements:

- Children under two years: 3.5 m² per child
- Two-year olds: 2.5 m² per child

- Children aged three to five years: 2.3 m2 per child

The variation in EY provision, between AM and PM sessions, and the high turnover of providers mean that this can often be a variable that changes monthly. For this reason, the same cost multiplier as primary aged pupils are used.

The Department for Education (DfE) provide an annual update to this figure and for 2020/21 this figure is £17,016.47. The Secondary calculation has been updated by the DfE to a figure of £21,864.18. These new figures have been confirmed by the DfE and are expected to rise in the future in line with inflation. Therefore, the cost per pupil multiplier will be updated as and when the DfE provide the new allocation allowance for Coventry.

The DfE do not provide costs per pupil place for Sixth form pupils. Therefore, the methodology takes the Secondary calculation and adds the additional floor space required for a sixth form pupil. The additional floor space required for a sixth form pupil over a secondary age pupil is a recognised DfE statistic. The basis behind these floor space calculations is the extra equipment and supervision that sixth form pupils require over secondary age pupils. The DfE state the additional floor space required be larger than that for Secondary, working this out as a percentage sixth form pupil require 30% more space than Secondary. Therefore, 30% has been added to the cost multiplier for Secondary to give a total for a single sixth form of £28,423.43.

For SEN, as there is no DfE multiplier, Coventry uses the benchmarking mechanism undertaken by the DfE in 2019, which recommends that 'Special schools require more space per pupil than mainstream schools, and this should be reflected in the assumed costs of provision. The Education Capital Strategy recommends that developer contributions for special or alternative school places are set at four times the cost of mainstream places, consistent with the space standards in Building Bulletin 104. The National School Delivery Cost Benchmarking report for the costs of delivering SEN school places.' recommends a cost of £76,184 average cost per pupil place for SEN, Coventry's cost per pupil multiplier has been updated to match this figure.

Pupil Yield

Early Years

The take up rate for Coventry for the 30hrs was circa 50% and the take-up rate two years old is circa 32% Although the take up rate is much higher for those eligible for funded two-year-old places (75%). These two programmes have effectively doubled the amount of Early Years care required. The impact of the new universal credit benefit system, and the lowering of the benefit cap, will also increase the eligibility of funded two-year-old places and therefore the amount of places required will increase. CCC are currently working to calculate the effect of this. Therefore, the contribution request is calculated from asking for two years' worth 15 Hrs or 0.8 of a FT year group with the take up rate of funded two years and 30 Hrs being added into this. This will be co-ordinated each year with Early Years colleagues as the take up rate for both Government schemes is expected to rise.

Primary and Secondary

Coventry has seen a primary age population increase in recent years with the current reception cohort being 17% higher than the current Year 11. This has been because of larger birth cohorts which have impacted upon available school places. These larger birth cohorts are coming from existing housing stock as well as new homes being put into the city. There has been relatively little new housing in Coventry over this period, but the city has become more attractive for people to raise families in, resulting in a younger population within the city. This trend is expected to continue in the new housing that is being put into the city. The formula for this is by examining the total number of eligible homes within Coventry and the current Number on Roll in Schools, split between Primary and Secondary. This gives the pupil yield for how many school age children the current housing stock within Coventry provide. The pupil yield from a single eligible dwelling for primary is 0.39 and for secondary 0.22 pupils per eligible household.

Sixth Form

The formula for this is calculated from the proportion of children staying on in sixth form and also staying in education between Years 12 and 13. However it is still an inconsistent indicator, therefore the percentage applied to the children staying on rate will be based on the stay-on rate of children the September before the application was received. For the most recent year, the drop off between year 12 and year 13 was 8.9% of the cohort, therefore, to incorporate this into the pupil yield only 1.9 year groups are requested. This has resulted in a drop in the sixth form contribution asked for.

Primary SEND

To calculate the primary SEND contribution Coventry City Council, use the school census published three times annually. This lists the student details for the current mainstream and Broad Spectrum Special School (BSSS) cohort and the number of children within this cohort an EHC plan or SEN statement. By understanding the total number of EHC plans and SEN statements within the current primary cohort, it is possible to calculate the current % of the cohort which require additional needs arising from new housing. By dividing the figures of total cohort by number of EHC's a total of 1.67% is received. This factor will be applied to the pupil yield calculation for primary. This figure will be updated annually as the number of EHC plans is rising in excess of proportionality of the general increase in population.

Secondary SEND

The Secondary SEND pupil yield is calculated using the same method of calculating the current number of secondary age pupils with an EHC plan or Statement and dividing by

the total amount of children in Secondary education. The current amount of EHC plans within Secondary school is 3.3%. This figure will be updated annually as the number of EHC plans is rising more than proportionality of the general increase in population.

Appendix 4 – Forecasting Methodology and Planning Considerations

Introduction

Local authorities use different methods to forecast pupil numbers and take different factors into account, the forecast of pupil numbers is then submitted to the ESFA annually and a basic need allocation is granted based off the information provided. This methodology explains the process by which the pupil forecasts are made.

Primary Reception Forecast

Birth Data is gathered annually from Health. This information is broken down into each individual school's catchment area, using GIS software. For forecasts beyond this point, i.e. When the birth data is not yet available, a three-year weighted average for each catchment area is used, to plot the trends and determine long term sufficiency planning.

A rate of inflation is applied to the birth cohort at the point it enters Reception provision. This figure is a weighted increasing average to reflect trends over the past 2 years. i.e., due to wider evidenced pressures on in-year arrivals to Coventry at an early year's age, from birth to reception intake the birth cohort will grow by c.5%. This 5% figure is applied to each catchment area across the city, as it is difficult to determine due to the transient nature of the pupils, where they are staying permanently in Coventry, and which schools they will apply for. As a result, it was felt fairer to split this 5% equally across the city.

This determines the number of pupils' resident in each school's catchment area broken into year of entry to Reception. To determine the number of pupils expected to be educated in each school and therefore planning area, this number is then broken down into how pupils move across the city. To calculate how this cohort is reflected onto a school level, the variable of parental choice is applied, with a historic percentage on the movement of pupils from each catchment area to all schools in the city being applied.

Where any school has an excess of forecast pupils above its PAN, unless it is agreed that the school can take above PAN, then that excess will be redistributed to other schools within the planning area. The redistribution is added by liaising with the School admissions team, and applying popularity factors to the schools in the planning area. Where all schools in a planning area are oversubscribed, the remaining pupils show as an excess within the planning area.

This calculates the September intake for each Primary School for Reception for the plan period. Any other mitigating factors, such as children residing out of Coventry and attending schools in the city, are where individual rates of increase are applied to specific schools, as this is more of a factor for schools near the city boundaries or with faith-based admission arrangements. Those rates are based on recent trends of children residing out of Coventry in the school. These are manually added after the Coventry applications are factored in, to account for the effective pushback of some of these children to their resident Local Authorities.

Secondary Year 7 Forecasts

For Secondary forecasts the methodology behind them is the same as the Primary element, with the exception that birth data is no longer used and instead the existing year 6 cohort within the city is the initial dataset.

The Year 6 cohort is calculated based on the existing school cohort from information provided by schools for the purposes of admissions co-ordination. CCC accounts for historic loss of pupils at the transfer round as children choose to attend schools in other local authority (LA) areas, including Warwickshire Grammar schools, and private education. This figure is calculated annually as it is dependent upon the amount of places available in other LA schools, however, this figure is typically around 170 pupils. This figure is deducted from the size of the prospective year 6 cohort.

Primary and Secondary In-Year

Once the September intake is calculated. In-Year variations are applied to both the intake and the existing school cohort, the existing school cohort being provided by schools directly as part of in-year processing. There are two forms of In-Year calculations within the forecasting model. These are migration rates and the impact of additional housing across the city.

Coventry has undergone significant in-year pressures (see commentary for more detail) in recent years and using a 2-year weighted average this same migration rate has been applied to future years. To avoid this in-year migrations impact on schools only being applied to schools with surplus places, Coventry applies a city-wide figure which is applied equally to all planning areas and year groups.

CCC maintains a database of housing developments, these housing developments are within the Local Plan or have already been approved as windfall sites. This database corresponds to the forecasting model and generates the estimated pupil yield from each housing development broken down by the number of homes being built per year. The pupil yield numbers are then added to individual schools based upon proximity to each housing development and the likelihood of those pupils attending that school. For the purposes of SCAP, which requires planning area forecasts, these are amalgamated into planning

areas. This pupil yield is calculated using formulae that are based off city wide pupil yields. In some cases, assumptions are made as to the rate the houses will be built, if this is not identified within the Local Plan or where practicalities of completion may mean the housing has been brought forward/pushed back.

Sixth Form

For Sixth form, a city-wide stay on rate has been applied based on current information on the transfer of pupils from the previous year 11 cohort to the year 12 now. The school's intake figures for Year 13 are generated from actual school values within the year 12 and the stay on rate from the previous year. These forecasts are then placed within the context of the projected Year 11 cohort for the forecast years. This transfer round considers the pupils transferring to other phases of education, such as apprenticeship, or FE colleges, which CCC do not forecast for.

Additional Detail

It should be stressed that the projections are only indicative. For instance, where the projection for the city is more than total amount of places available and an individual school forecast exceeds the capacity of that school, therefore no redistribution can occur as there are insufficient city-wide school places, the projections do not imply that the school will be required to admit the additional pupils.

Appendix 5 – Primary Forecasts

The forecasts below have been calculated using the above methodology (assuming continuation of current levels of in-year growth). The assumptions within the methodology are being continually reviewed to ensure accuracy of forecasts.

Primary Planning Area	Year	Reception Forecasts	PAN	Available Capacity	Total NOR Forecasts	Overall Capacity	Available Capacity
North	2023/24	315	315	0%	2226	2217	0%
	2024/25	303	315	4%	2298	2217	-4%
	2025/26	312	315	1%	2380	2217	-7%
	2026/27	317	315	-1%	2390	2217	-8%
	2027/28	326	315	-3%	2456	2217	-11%
North Central	2023/24	486	480	-1%	3577	3480	-3%
	2024/25	457	480	5%	3532	3450	-2%
	2025/26	460	480	4%	3505	3420	-2%
	2026/27	468	480	3%	3483	3390	-3%
	2027/28	487	480	-1%	3475	3390	-2%

East Central	2023/24	525	525	0%	3816	3765	-1%
	2024/25	494	555	11%	3792	3765	-1%
	2025/26	496	555	11%	3760	3795	1%
	2026/27	509	555	8%	3787	3795	0%
	2027/28	527	555	5%	3782	3825	1%
West Central	2023/24	225	225	0%	1574	1575	0%
	2024/25	212	225	6%	1624	1575	-3%
	2025/26	214	225	5%	1653	1575	-5%
	2026/27	219	225	3%	1679	1575	-7%
	2027/28	207	225	8%	1669	1575	-6%
Longford	2023/24	420	450	7%	3162	3150	0%
	2024/25	397	450	12%	3156	3120	-1%
	2025/26	400	450	11%	3120	3120	0%
	2026/27	409	450	9%	3108	3120	0%
	2027/28	399	450	11%	3072	3120	2%
North East	2023/24	356	360	1%	2582	2610	1%
	2024/25	336	360	7%	2568	2610	2%
	2025/26	338	360	6%	2581	2580	0%
	2026/27	345	360	4%	2598	2580	-1%
	2027/28	322	360	11%	2573	2520	-2%
East	2023/24	432	435	1%	3060	3045	0%
	2024/25	407	435	7%	3073	3045	-1%
	2025/26	408	435	6%	3073	3045	-1%
	2026/27	416	435	4%	3086	3045	-1%
	2027/28	435	435	0%	3103	3045	-2%
Binley	2023/24	268	270	1%	1865	1902	2%
	2024/25	253	270	6%	1898	1902	0%
	2025/26	255	270	5%	1930	1902	-1%
	2026/27	261	270	3%	1953	1902	-3%
	2027/28	256	270	5%	1964	1902	-3%
South East	2023/24	180	180	0%	1267	1260	-1%
	2024/25	169	180	6%	1322	1260	-5%
	2025/26	170	180	5%	1343	1260	-7%
	2026/27	173	180	4%	1366	1260	-8%
	2027/28	165	180	8%	1366	1260	-8%
South	2023/24	360	360	0%	2655	2625	-1%
	2024/25	339	360	6%	2646	2580	-3%
	2025/26	340	360	5%	2623	2595	-1%
	2026/27	347	360	4%	2632	2550	-3%
	2027/28	365	360	-1%	2622	2535	-3%
Tile Hill	2023/24	189	195	3%	1375	1365	-1%
	2024/25	180	195	8%	1410	1365	-3%

	2025/26	181	195	7%	1432	1365	-5%
	2026/27	184	195	6%	1456	1365	-7%
	2027/28	183	195	6%	1457	1365	-7%
West	2023/24	225	225	0%	1574	1575	0%
	2024/25	212	225	6%	1624	1575	-3%
	2025/26	214	225	5%	1653	1575	-5%
	2026/27	219	225	3%	1679	1575	-7%
	2027/28	207	225	8%	1669	1575	-6%
North West	2023/24	187	210	11%	1409	1470	4%
	2024/25	178	210	15%	1450	1470	1%
	2025/26	182	210	13%	1478	1470	-1%
	2026/27	186	210	11%	1486	1470	-1%
	2027/28	186	210	11%	1491	1470	-1%
Coundon	2023/24	202	210	4%	1584	1530	-4%
	2024/25	190	210	9%	1577	1530	-3%
	2025/26	191	210	9%	1591	1500	-6%
	2026/27	196	210	7%	1574	1470	-7%
	2027/28	203	210	3%	1550	1470	-5%
City Wide	2023/24	4370	4440	2%	31726	31569	0%
	2024/25	4128	4470	8%	31968	31464	-2%
	2025/26	4162	4470	7%	32121	31419	-2%
	2026/27	4249	4470	5%	32274	31314	-3%
	2027/28	4268	4470	5%	32246	31269	-3%

Appendix 6 – Secondary Forecasts

The forecasts below have been calculated using the above methodology (assuming continuation of current levels of in-year growth). The assumptions within the methodology are being continually reviewed to ensure accuracy of forecasts.

Secondary Planning Area	Year	Year 7 Forecast	PAN	Available Capacity	Total NOR Forecasts	Overall Capacity	Available Capacity
Central	2023/24	555	540	-3%	2638	2621	-1%
	2024/25	550	540	-2%	2717	2670	-2%
	2025/26	571	540	-6%	2818	2700	-4%
	2026/27	582	540	-8%	2888	2700	-7%
	2027/28	610	540	-13%	2956	2700	-9%
North West	2023/24	905	895	-1%	4560	4505	-1%
	2024/25	913	895	-2%	4638	4475	-4%

	2025/26	956	895	-7%	4712	4475	-5%
	2026/27	987	895	-10%	4824	4475	-8%
	2027/28	1018	895	-14%	4946	4475	-11%
Foxford	2023/24	212	210	-1%	977	960	-2%
	2024/25	214	210	-2%	1025	990	-4%
	2025/26	238	210	-13%	1095	1020	-7%
	2026/27	233	210	-11%	1149	1050	-9%
	2027/28	243	210	-16%	1209	1050	-15%
South	2023/24	500	480	-4%	2368	2370	0%
	2024/25	459	480	4%	2426	2430	0%
	2025/26	487	480	-1%	2505	2430	-3%
	2026/27	509	480	-6%	2535	2400	-6%
	2027/28	547	480	-14%	2572	2400	-7%
East	2023/24	630	630	0%	3039	3000	-1%
	2024/25	630	630	0%	3060	3060	0%
	2025/26	597	630	5%	3121	3120	0%
	2026/27	605	630	4%	3152	3150	0%
	2027/28	644	630	-2%	3193	3150	-1%
North East	2023/24	563	600	6%	2613	2806	7%
	2024/25	579	600	4%	2742	2900	5%
	2025/26	588	600	2%	2872	2940	2%
	2026/27	591	600	2%	2900	3000	3%
	2027/28	603	600	-1%	2998	3000	0%
South East	2023/24	690	685	-1%	3280	3355	2%
	2024/25	654	685	5%	3339	3425	3%
	2025/26	660	685	4%	3396	3455	2%
	2026/27	661	685	4%	3403	3425	1%
	2027/28	680	685	1%	3420	3425	0%
South West	2023/24	574	574	0%	2993	2996	0%
	2024/25	533	574	7%	3041	3026	0%
	2025/26	516	574	10%	3040	3026	0%
	2026/27	520	574	9%	3024	3026	0%
	2027/28	550	574	4%	3054	3026	-1%
City Wide	2023/24	4629	4614	0%	22468	22613	1%
	2024/25	4531	4614	2%	22988	22976	0%
	2025/26	4613	4614	0%	23559	23166	-2%
	2026/27	4688	4614	-2%	23875	23226	-3%
	2027/28	4895	4614	-6%	24348	23226	-5%

Appendix 7 – SEN Projected Methodology

1. Introduction

Working in partnership Coventry City Council (CCC)'s Special Educational Needs (SEN) team and The Education Capital Strategy team have utilised the DfE's guidance on forecasting specialist places, as outlined in 'Forecasting demand for SEND Provision – Guidance for Local Authorities', April 2023, to arrive at a set of forecasts showing the demand for specialist placements for Coventry residents. This planning and forecasting of high needs provision has involved all relevant teams across the local authority – including education service delivery, school's revenue & capital finance teams, as well as the Council's Corporate Property department – and been overseen by senior leaders appraised of the need for a strategic approach and of the risks and issues involved.

To conform to the expectations as set out by the DfE as part of the School Capacity (SCAP) return⁸, Coventry forecast for the number of specialist places required to accommodate pupils with an Education, Health & Care plan (EHCP) in each statutory school age year group. Reception to Year 13 is forecast for each academic year for five years at primary phase and seven years at secondary phase. Reviewing EHCP rate by phase (e.g. primary) will not sufficiently capture differences in EHCP prevalence.

As required for the DfE's SCAP return, forecasts are produced, by the following types of specialist provision:

- SEN Unit & Resourced provision⁹
- Special schools (state maintained and non-maintained)
- Independent special schools
- Alternative provision

The DfE currently requires forecasts only at local authority level, rather than subsets within Coventry. As Coventry is unitary and geographically small, CCCC have adopted this approach. There is also no requirement from the DfE on providing different forecasts for the different types of SEN – mainly Broad Spectrum, Autism Spectrum Condition, or Social, Emotional, & Mental Health (SEMH).

2. Methodology - overview

The methodology comprises several steps, with one common step at the beginning before splitting into distinct primary and secondary phase methodologies to determine the number

⁸ The SCAP return is a statutory annual data collection based around providing the Department for Education with the anticipated capacity and pupils numbers for the foreseeable future.

⁹ The distinction between the Resourced Provision and SEN Units, is most succinctly found here - <https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england>. In summary, SEN units are special provisions within a mainstream school where the pupils with SEN are taught mainly within separate classes for at least half of their time, whereas Resourced provisions are places that are reserved at a mainstream school for pupils with a specific type of SEN, taught mainly within mainstream classes, but requiring a base and some specialist facilities around the school.

of specialist placements required and then splitting this between the various types of provision available within Coventry:

- Setting out the number of pupils who are currently attending a specialist provision within Coventry broken down by year group. This is based upon information gathered by CCC's pupil database. This forms the basis of the projections for the existing school cohort. Using this allows for a more accurate reflection of the current picture as a baseline rather than using % calculations as a proportion of the entire school cohort.

Primary

- For Reception intake, for each academic year, the anticipated number of places required is calculated from the early year's cohort with a EHCP from the benchmark of the past 3 years of pupils who have required a specialist place. (Double-weighted for the most recent year).
- For each academic year new arrivals to the city who require a specialist placement are factored in– this is a static rate applied from previous trends on new arrivals and presumes an equal split across all year groups.
- Accounting for additional pupils from other local authorities that are likely to seek accommodation in specialist provision in Coventry in year of entry ('Out of County'). This is based on historical patterns. However, numbers for this are relatively low and can be discounted without changing the overall trend in terms of demand for specialist placements.
- Calculating the sum of these factors, including current NOR, in-year arrivals, and other LA pupils requiring a place, to determine the amount of specialist placements needed.
- This process is then continued for each academic year, with the existing school cohort being rolled forward each year.

Academic Year	Yr0	Yr1	Yr2	Yr3	Yr4	Yr5	Yr6
2023/2024	54	59	78	79	80	86	97
2024/2025	58	61	63	88	87	82	93
2025/2026	65	61	61	73	93	95	91
2026/2027	67	68	63	75	79	99	102
2027/2028	70	76	74	81	81	87	104 ¹⁰

Secondary

- Calculating the number of pupils who will be in Year 6 for each academic year currently in a specialist setting.
- For the Year 6/Year 7 transfer factoring in the number of pupils who transfer from a Year 6 mainstream school place to a Year 7 Specialist school placement - this is a

¹⁰ Please see the One Strategic Plan for Education for the final figures, these are purely indicative.

percentage static rate but flexible number as it is dependent upon the size of the Year 6 cohort within a mainstream school and that 20% will require a specialist placement at secondary age.

- For each academic year factoring in the new arrivals to the city who require a specialist placement – this is a static rate applied from previous trends on new arrivals and presumes an equal split across all year groups.
- Accounting for additional pupils from other local authorities that are likely to seek accommodation in specialist provision in Coventry in year of entry ('Out of County'). This is based on historical patterns.
- In a similar vein to primary, calculating the sum of these factors to determine the amount of specialist placements needed.
- This process is then continued for each academic year, with the existing school cohort being rolled forward each year.

Academic Year	Yr7	Yr8	Yr9	Yr10	Yr11	Yr12	Yr13	Yr14	Total
2023/2024	128	129	108	121	104	79	72	36	1310
2024/2025	146	134	127	120	121	81	79	72	1412
2025/2026	148	148	134	141	117	96	81	79	1483
2026/2027	153	138	149	147	137	90	96	81	1544
2027/2028	164	155	139	164	145	107	90	96	1633 ¹¹

Determining the split of Specialist Placements

- Once the number of specialist placements has been determined, the anticipated placement by type of provision needs to be determined, as per historic and place planning strategy – Coventry Inclusion Strategy, and One Strategic Plan for Education.
- The historic data is gathered from analysis of the school cohort and their current type of placement,¹² using the formula:
- Number of pupils in [relevant provision type] ÷ the total number of pupils with EHCPs in that year.
- With the place planning strategy for future years coming from the proposals developed by the SEN working group and how Coventry wants to influence its placement split across sites. This developing of strategy allows the LA to consider local policy that will have an impact on those future trends, for example a drive towards inclusion within mainstream provision and attempting to lessen the number of pupils placed within the independent sector.
- A table of anticipated placement rates for various types of provision is provided separately for primary & secondary age pupils for each academic year based on a trend analysis of their historic data and as part of the One Coventry Plan for providing additional SEN provision across the city.
- For example, of Secondary, see below.

¹¹ Please see the One Strategic Plan for Education for the final figures, these are purely indicative.

¹² This also allows shifts in the balance of provision that existing pupils are attending to be evidenced against strategy and shows that between current and forecast placement rates there is no significant unplanned shift.

Secondary Placement Rates	SEN Unit & Resource Provision	Special Schools	Independent	Alternative Provision
Current Academic Year	2%	89%	10%	0%
2023/24	2%	89%	10%	0%
2024/25	4%	86%	10%	0%
2025/26	4%	87%	9%	0%
2026/27	4%	87%	9%	0%
2027/28	4%	88%	8%	0%
2028/29	4%	88%	8%	0%
2029/30	4%	88%	8%	0%

- Once these rates have been established, applying the % rate for each specialist type of provision to total EHCPs who require a specialist place by year, provides a forecast for primary & secondary pupils in each year group who will need a place as required by the SCAP return.
- CCC believes this approach reflects demand from the perspective of the commissioning body operating a financially sustainable local offer, i.e. the demand a reasonable and effective Local Authority will experience after taking account of existing placement policies, the local SEND strategy, likely pupil and parent preferences and any local reform measures as set out above.

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Public report Cabinet

Cabinet

13th February 2024

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:

Local Development Scheme (LDS) Update

Is this a key decision?

Yes – the Local Development Scheme significantly affects residents or businesses in more than 2 wards of the city

Executive Summary:

Further to Cabinet and Councils decision to progress with a full review of the Coventry Local Plan in November and December respectively, the Local Development Scheme has been updated to indicate the timescales and the ongoing process of the review. The Local Authorities Local Development Scheme should be kept up to date and made publicly available in order enable the local community and interested parties to be informed of progress.

Further to the initial stage of public consultation held between 18th July and 29th September 2023, the timescales have been reviewed and an updated LDS produced at Appendix 1 to the report.

Recommendation:

Cabinet is requested to:

- 1) Adopt the draft Local Development Scheme 2023-2025 appended at Appendix 1 to the report.

List of Appendices included:

Appendix 1: Draft Local Development Scheme 2023-2025

Background papers:

None

Other useful documents

2017 Local Plan

Cabinet, 15th November 2022 - Local Plan Review Report

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 – However, the Local Plan Review is informed by Local Plan Cabinet Advisory Panel

Will this report go to Council?

No

Report title: Local Development Scheme Update

1. Context (or background)

- 1.1. Local Plans must be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework:

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary”.

- 1.2 At the meeting of Cabinet on 15th November 2022 (minute 52/22 refers) and the meeting of Council on 6th December 2022 (their minute 84/22 refers) authority was given to progress with a full review of the Local Plan, seeking to assess if the existing suite of policies had proven effective in decision making, and if these policies aligned with the wider corporate objectives of the Local Authority.
- 1.3 Cabinet authority was then sought at the meeting on 12th July 2023 (minute 12/23 refers) in order to undertake the initial stage of public consultation upon the Local Plan Review. Following this, a Regulation 18 ‘issues and options’ public consultation was undertaken between 18th July and 29th September 2023.
- 1.4 Further to analysis of the representations received from public consultation, which informs the necessary evidence base to progress to further stages of the plan review, the Local Development Scheme has been reviewed to ensure that the timescales presented provide an accurate forecast of the forthcoming stages.
- 1.5 There are a number of variables that may lead to that timeline being extended including the unavailability of Inspectors to convene the Examination in Public or a longer time needed to assess and integrate complex representations to the consultations. Any significant delays will be reported to Cabinet in future reports.
- 1.6 An indicative timeline of the plan review is shown below and is included in a refreshed Local Development Scheme at Appendix 1 to the report.

	2023						2024												2025											
	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Reg 18 consultation (Issues & Options)																														
Representation analyses / update and commission evidence base																														
Update Local Development Scheme (LDS)																														
Local Plan Advisory Panel Engagement																														
Policy & Plan preparation																														
Reg 19 (Publication) Plan to Cabinet																														
Reg 19 consultation																														
Representation analysis / prep for submission																														
Council authority to submit plan																														
Submit for examination																														
Examination in public																														
Inspectors report / prep report to Council																														
Adoption																														

2. Options considered and recommended proposal.

2.1 Do Nothing (Not Recommended)

Cabinet could choose not to adopt the draft 2023-2025 Local Development Scheme at this stage, however publication of the timelines aids local communities and interested parties to monitor the progress of the Local Plan Review and is informed by public consultation to date.

2.2 Adopt the draft Local Development Scheme 2023-2025

Cabinet could choose to adopt the draft Local Development Scheme 2023-2025 to update local communities and interested parties of the progress of the local plan review.

3. Results of consultation undertaken

3.1. Whilst no direct consultation has taken place on the LDS, the timelines of the Local Plan Review are informed by regulation 18 consultation which was held between 18th July and 29th September 2023.

3.2. No formal consultation has taken place yet. Public involvement is a key element of the Plan Review and will be undertaken as set out in the Local Development Scheme.

4. Timetable for implementing this decision

4.1. The decision will be implemented as soon as practicable.

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

5.1. Financial implications

There are no direct financial implications of publication of the updated Local Development scheme, however costs are associated to the ongoing Local Plan Review. An estimation of associated costs was provided within the November 2022 Cabinet Report, whilst the cost of the Examination will be estimated in a future report closer to the time, which will allow for a more accurate estimation of both time and location costs.

5.2. Legal implications

In accordance with section 15 of the Planning and Compulsory Purchase Act 2004, every local planning authority must prepare planning policy documents and maintain the Local Development Scheme, specifying the documents that will be local development documents; their subject matter and area; and the timetable for their preparation and revision.

6. Other implications

6.1. How will this contribute to the One Coventry Plan? (<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>)

Through progressing the timelines within the LDS, the Local Plan will continue to contribute to aims of the One Coventry Plan such as improving the lives of current and future residents, ensuring the delivery of affordable homes, employment opportunities and accessible open space.

6.2. How is risk being managed?

An internal risk log has been developed and will be updated as progress is made or changes occur and will be reviewed at the monthly Plan Review meeting held between officers and the Cabinet Member for Communities and Housing.

6.3. What is the impact on the organisation?

There will be a staffing and resource impact from these proposals in order to deliver upon the stated timelines, however these are anticipated to be absorbed within current staffing provision.

6.4. Equality/ EIA

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

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

The continued development of a reviewed Plan as outlined in the LDS will allow the Council to consider additional policies related to climate change and the environment.

6.6. Implications for partner organisations?

None

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Service Area

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Enquiries should be directed to the above person

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Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	13.12.2023	18.12.2023
Names of approvers for submission: (officers and members)				
Cath Crosby	Lead Accountant, Business Partnering, Place	Finance	13.12.2023	18.12.2023
Oluremi Aremu	Head of Legal and Procurement Services	Law and Governance	13.12.2023	18.12.2023
Andrew Walster	Director of Streetscene and Regulatory Services	-	13.12.2023	22.12.2023
Councillor D Welsh	Cabinet Member for Housing and Communities	-	20.12.2023	20.12.2023

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Coventry City Council Local Development Scheme

February 2024

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1.0 Introduction

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

1.2 It is a legal requirement¹ that a LDS is prepared, kept up to date and made publicly available. This LDS will therefore be published on the Council's website.

1.3 The documents which are covered by this LDS the Local Plan Review and the Houses in Multiple Occupancy (HMO) Development Plan Document (DPD) The LDS sets out the anticipated timing of the forthcoming stages of the preparation, consultation and Examination of the Plan Review and, separately, the HMO DPD. We also include a section upon Neighbourhood Plans which communities can choose to prepare for their local area should they wish to do so.

¹ Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended)

2.0 The previous LDS

2.1 The previous Local Development Scheme was published in November 2022, covering the period November 2022 - December 2023. It is important that the LDS is updated to reflect the progress of implementation of the decision to undertake a full Plan Review.

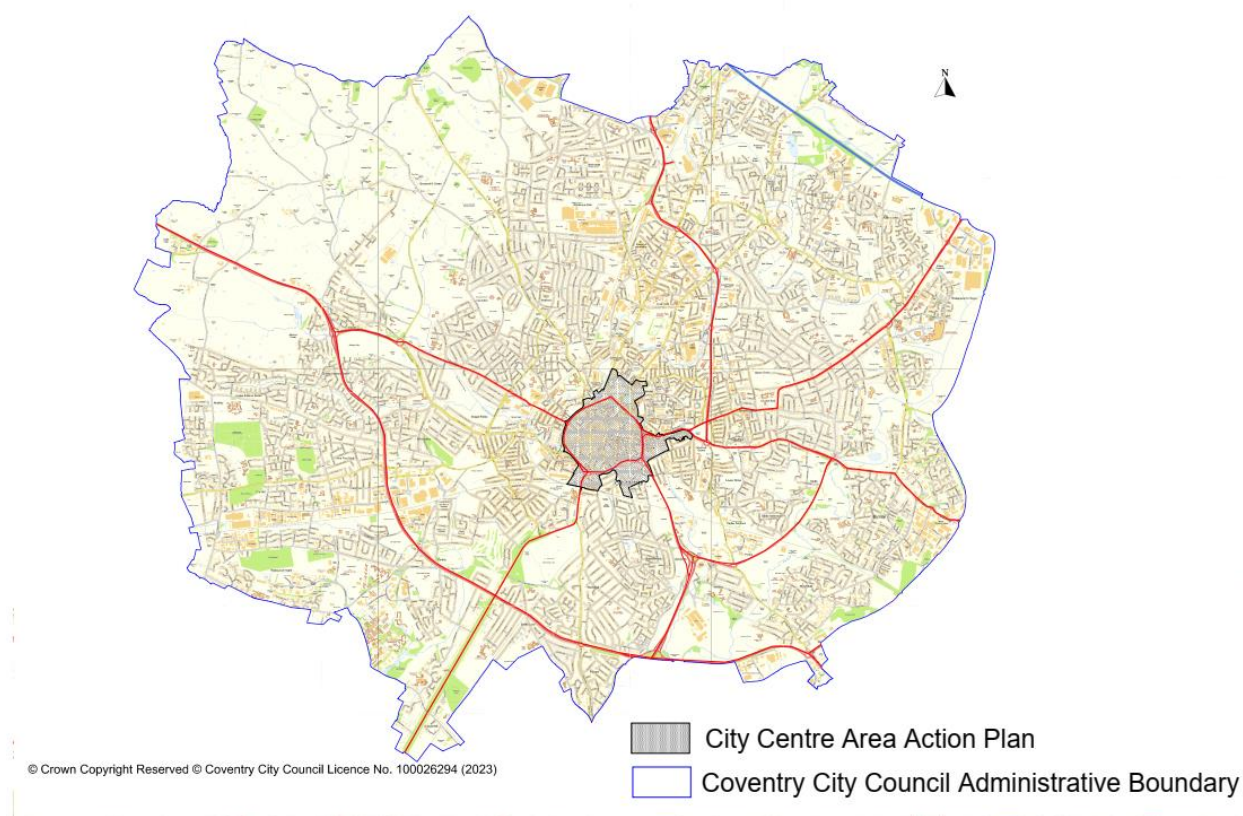
2.2 The previous LDS included the HMO DPD and associated Article 4 Direction which has now been confirmed. An indicative timetable for the examination of the DPD is now included for clarity.

3.0 Development Plan Documents

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

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

Figure 1



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

3.4 The Local Plan Regulations² require that Local Plans must be reviewed every five years, starting with the date of adoption. The review must consider changing circumstances affecting the area, or any relevant changes in national policy³ in order to determine whether any strategic policies need updating.

3.5 Bearing in mind the aforementioned requirement, Table 1 sets out the timetable for a full review of the Local Plan, which is inclusive of the City Centre Action Plan.

3.6 A more detailed work programme is laid out in the appendix to this document.

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

³ National Planning Policy Framework 2021 paragraph 33

Table 1: Local Plan review timetable (key milestones – further detail in Appendix 1)

	2023		2024				2025			
	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)
Regulation 18 Consultation										
Policy & Plan preparation										
Regulation 19 Consultation										
Submission										
Examination										
Adoption										

3.7 Table 2 below sets out the timetable for the new Homes in Multiple Occupation DPD and, for clarity, also includes the now concluded delivery timeline for the Article 4 Direction. The DPD covers the same geographical area as the Coventry City Council administrative boundary illustrated in Figure 1.

3.8 The consultations on both the Article 4 Direction and the HMO DPD have both been completed, with the Article 4 now confirmed and in place in the affected Wards, whilst the HMO DPD is currently awaiting examination, scheduled for Q1 of 2024.

**Table 2: Houses in Multiple Occupancy DPD timetable
(with timeline for Article 4 Direction also included)**

	2022				2023				2024			
	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)
HMO DPD			C*	C*	P	P		E	E	A		
Article 4 Direction			C	C				A4C				

C – Consult

C* - Consultation (Regulation 18)

P – Publication (Proposed submission – Regulation 19)

A – Adopt

E – Examination

A4C – Article 4 Confirmation

Regulations refer to those set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

4.0 Supplementary Planning Documents

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

4.2 During the period of plan review, the Council intends to produce an update to its Health Impact Assessment Supplementary Planning Document (HIA SPD), which will cover the administrative area of Coventry City Council.

4.3 In addition, a Supplementary Planning Document jointly produced between Coventry City Council and Warwick District Council is proposed to support the continued growth and expansion of the University of Warwick. This is set out in policy DS2 of the adopted Coventry Local Plan which supports cross boundary partnership working, including the production of SPDs with growth and expansion of the University of Warwick specifically cited.

4.4 The timetable for producing and consulting upon the above SPDs is set out below.

Table 3: SPD timetable

	2024				2025
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)
University of Warwick SPD			C	A	
Health Impact Assessment SPD Update				C	A

C - consult

A - adopt

5.0 Neighbourhood Plans

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

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

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

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

6.0 Monitoring and Data Standards

6.1 Progress on the compliance with the timetables contained within the Local Development Scheme will be reported in the Authority Monitoring Report which the Council publishes annually.

6.2 To comply with the legislation⁴ all documents will be produced to accord with any data standards required by Government.

⁴ Planning and Compulsory Purchase Act 2004 as amended by the Neighbourhood Planning Act 2017

Appendix 1 – Detailed timeline for Plan Review

	2023						2024												2025											
	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Reg 18 consultation (Issues & Options)																														
Representation analyses / update and commission evidence base																														
Update Local Development Scheme (LDS)																														
Local Plan Advisory Panel Engagement																														
Policy & Plan preparation																														
Reg 19 (Publication) Plan to Cabinet																														
Reg 19 consultation																														
Representation analysis / prep for submission																														
Council authority to submit plan																														
Submit for examination																														
Examination in public																														
Inspectors report / prep report to Council																														
Adoption																														

If you need this information in another format or language,
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Cabinet

13th February 2024

Name of Cabinet Member:

Cabinet Member for Public Health, Sport and Wellbeing – Councillor K Caan

Director Approving Submission of the report:

Director of Public Health and Wellbeing

Ward(s) affected:

All

Title:

Smokefree Generation – Local Authority Funding Allocation

Is this a key decision?

No

Executive Summary:

The government's new 'Stopping the Start: our new plan to create a Smokefree Generation' plan was published in October 2023. This plan aims to create a smokefree generation by 2030. Part of this plan is for Local Authorities to increase spend on stop smoking programmes and commissioned services, targeting populations where smoking prevalence is highest.

Coventry City Council has been notified that it will be awarded a grant of £520,304 annually from April 2024 until March 2029. This will be an annual agreement. To be eligible to accept the funding, existing spend on stop smoking services must be ringfenced, continuing to support stop smoking programmes and services.

The Office for Health Inequalities and Disparities (OHID) sets the priorities it expects the grant to be used for. A detailed proposal will be developed and submitted for Coventry in line with these priorities, along with data and reporting.

Recommendations:

Cabinet is requested to:

- 1) Agree to accept the "Stopping the Start" Grant in the sum of £520,304 for 2024/25 noting that future grants may be the subject of further reports.

- 2) Delegate authority to the Director of Public Health and Wellbeing to undertake the necessary procurement exercises and/ or enter into grant agreements with external organisations (to a value no higher than the “Stopping the Start” Grant sum of £520,304) to meet the deliverable requirements of the “stopping the Start” Grant.
- 3) Delegate to the Director for Public Health and Wellbeing following consultation with the Chief Legal Officer to enter into the necessary legal agreements to give effect to the above recommendations.

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?

No

Report title: Smokefree Generation 2030 – Local Authority Funding Allocation

1 Context (or background)

- 1.1 On Wednesday 4 October 2023, the Prime Minister announced proposals to raise the age of sale for tobacco by one year every year, and to tighten restrictions on the sale of vapes to children and young people. Key steps of the proposal include:
 - 1.1.1 Legislate to raise the age of sale one year every year from 2027 onwards. The proposed legislation would make it an offence to sell tobacco products to anyone born on or after 1 January 2009 which will stop children turning 14 or younger this year from ever legally being sold tobacco products.
 - 1.1.2 An increase in funding for local authority Stop Smoking Services from next year. outlines a £520k additional funding allocation for Coventry, recurrent for 5 years from April 24 - <https://www.gov.uk/government/publications/local-stop-smoking-services-and-support-additional-funding/local-stop-smoking-services-and-support-guidance-for-local-authorities>
 - 1.1.3 Increase funding for awareness raising campaigns by £5 million this year and £15 million from next year onwards.
 - 1.1.4 Increase funding for enforcement on illicit tobacco and e-cigarettes by £30 million from next year.
 - 1.1.5 Evaluate the findings from the youth vaping consultation on specific measures to tackle the increase in youth vaping.
- 1.2 The Government's proposals will help achieve the ambition of a smokefree England by 2030 and ensure children and young people do not become addicted in the first place.
- 1.3 The Government is investing an additional £70 million per year to support local authority-led stop smoking services, with each local authority's allocation calculated based on a formula involving a funding rate of £12.39 per smoker multiplied by the total estimated number of smokers resident in the area. To receive the funding, local authorities must maintain their existing spend on stop smoking services.
- 1.4 It is intended that the priorities for the grant in 2024/25 will be used to:
 - Increase leadership, coordination and commissioning activity across Coventry.
 - Increase local resources to help people quit smoking.
 - Increase referrals into stop smoking services and improve pathways.
 - Increase promotion of local stop smoking support.
 - Look into joint funding opportunities to coordinate marketing, service design and delivery.
- 1.5 The funding will be recurrent annually for 5 years.

2 Needs assessment review

- 2.1 A comprehensive needs assessment will be carried out to inform the programme of work for Coventry, and for future commissioning. The needs assessment is expected to be completed by Spring 2024.

3 Options considered and recommended proposal

- 3.1 The value of the funding allocation is such that the Constitution requires formal approval prior to acceptance.
- 3.2 The Office for Health Inequalities and Disparities (OHID) sets the priorities it expects the grant to be used for. A detailed proposal will be developed and submitted for Coventry in line with these priorities, along with data and reporting.

4 Timetable for implementing this decision

- 4.1 The Office for Health Improvement & Disparities (OHID) confirmed Coventry's allocation in November 2023. A grant agreement was issued in January for sign off by Coventry City Council.

5 Comments from Interim Chief Operating Officer (Section 151 Officer) and Chief Legal Officer

5.1 Financial implications

Whilst the Council has been notified that it will receive recurrent funding for 5 years, at present, the funding will be provided annually and OHID is currently working through the details of how funding of years 2-5 will be issued. Therefore, this report seeks approval only for the first year of funding (2024/25). Once future allocations are confirmed we will seek approval for these via appropriate routes.

The value of the funding for 2024/25 is £520,304. The plan states there will be recurrent funding for 5 years at the same allocation, however this will be confirmed at a later stage. We will receive 70% of the annual allocation in April 2024, and the remaining 30% will be received later in the year once data reporting has been submitted. The grant conditions require the grant to be spent in year and any amounts underspent may be subject to clawback. At the time of writing, OHID are clarifying the financial conditions, including those specifying the requirements that must be met in order to release the 30% of funding. Once the grant conditions are published, these will be shared with Finance colleagues to review and provide final approval.

In order to receive the grant, local authorities are required to maintain existing spend on smoking cessation services, based on their spend in 2022/23, throughout the whole grant period and provide financial monitoring information. The 2022/23 current Coventry City Council spend is £420,252 as reported via the 22/23 Stop Smoking Services quarterly returns.

5.2 Legal implications

This report seeks authority to accept a grant award by OHID and to enter into a grant agreement with OHID.

s1 Localism Act 2011 gives the Council a general power of competence and as such the Council has the power to receive grant funding and enter into a grant agreement.

Prior to entering into the grant agreement Legal Services will review and provide the necessary advice on the grant terms and conditions published by OHID.

The Public Health team (with any necessary support from Legal Services) will monitor provision to ensure that the grant conditions are met, and outcomes delivered.

6 Other implications

6.1 How will this contribute to the One Coventry Plan? (<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>)

The services support the One Coventry Plan's vision to help to make communities safer, improve the health and wellbeing of local residents, reduce health inequalities and protect our most vulnerable people.

6.2 How is risk being managed?

Public Health and commissioners will work closely with oversight from the wider tobacco dependency working group and Coventry and Warwickshire Tobacco Partnership to understand and mitigate risks in relation to the grant.

6.3 What is the impact on the organisation?

The delivery and management of the grant requires the involvement a number of officers from across the council both in terms of the administration of the grant.

6.4 Equality Impact Assessment (EIA)

The provision is targeted at supporting some of the most vulnerable people in our communities where smoking prevalence is highest. A needs assessment is being conducted to ensure equality of access to stop smoking services. This will be in the form of a Health Equity Assessment Tool (HEAT).

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

There are no implications.

6.6 Implications for partner organisations?

Healthy Lifestyles (HLS) Coventry and South Warwickshire Foundation NHS Trust are commissioned to deliver stop smoking services by the City Council and operate closely with a wide range of partners including primary and secondary healthcare providers, other commissioned services and wider partners.

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

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Public Health and Wellbeing

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Suzanne Bennett	Governance Services Co-ordinator	Law and Governance	15.01.2023	15.01.2023
Paul Hargrave	Senior Commissioning Manager - Adults	Public Health and Wellbeing	18.12.2023	20.12.2023
Jane Fowles	Consultant in Public Health	Public Health and Wellbeing	18.12.2023	21.12.2023
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Names of approvers for submission: (officers and members)				
Allison Duggal	Director of Public Health and Wellbeing	-	03.01.2024	03.01.2024
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John Redfern	Corporate and Commercial Lawyer	Law and Governance	03.01.2024	23.01.2024
Councillor K Caan	Cabinet Member for Public Health, Sport and Wellbeing	-	03.01.2024	23.01.2024

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

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Cabinet

13th February 2024

Name of Cabinet Member:

Cabinet Member for Policing and Equalities – Councillor A S Khan

Cabinet Member for Housing and Communities – Councillor D Welsh

Director Approving Submission of the report:

Chief Legal Officer

Ward(s) affected:

All

Title:

Proposed statutory consultation for the designation of a new Additional HMO Licensing Scheme 2025 – 2030

Is this a key decision?

Yes - the proposals will significantly affect residents or businesses in all wards of the City

Executive Summary:

The provision of good quality housing for Coventry residents is a key priority for the City Council.

Houses in Multiple Occupation (HMOs) are a major concern in Coventry. It is estimated that Coventry is one of the top 14 authorities having the highest number of HMOs in England and Wales with around 6,800 HMOs or 26% of the total Private Rented Sector (PRS) stock.

Planning policy has been developed by the Council to create and sustain an appropriate 'mixed and balanced communities', by encouraging the spread of sustainable and viable options for accommodation. Notwithstanding, the city does have large areas where HMOs within the PRS are substantial in number.

It is recognised that there are many good quality landlords operating in the city, but unfortunately there are also those who do not maintain their properties leaving tenants at risk and giving potential problems to neighbouring properties.

Under the Housing Act 2004 the Government have legislated to provide local authorities with powers to tackle poor quality HMOs in the PRS through Mandatory Licensing,

however this only relates to those HMOs that have 5 or more occupants from two or more households.

HMOs with 3 or 4 occupants from 2 or more households form an unusually high percentage of houses in the city (approx. 63%) and provide much needed accommodation for residents, particularly students who would typically live in this type of accommodation following their first year at university.

In 2019 the Council approved a report to designate the whole of its area subject to Additional Licensing which provides a mechanism to secure the improvement of all of the HMO stock in the city. When it was first introduced the overall purpose of the licensing scheme was to: 'alleviate the housing situation by setting and maintaining minimum standards across the city in the most vulnerable sector of Coventry's private rental market'.

The scheme runs for a period of 5 years and commenced on 4th May 2020 and will cease on 4th May 2025 and means that all HMOs including properties converted into self-contained flats without Building Regulation Approval (sec 257 HMOs); require a licence.

Recommendations:

Cabinet is recommended to:

- 1) Consider the Additional Licensing Review Report 2023 and resolve there is a need to make a new designation for a citywide Additional Licensing scheme commencing from 5th May 2025.
- 2) Authorise a citywide statutory 12-week consultation beginning on 26th of February 2024 and ending on 17th of May 2024.
- 3) Request a future report setting out the responses received to the statutory period of public engagement, proposed HMO licensing policy, standards and fees and charges for the new Additional Licensing scheme.

List of Appendices included:

Appendix 1 – Report on the review of Additional Licensing scheme 2023
Appendix 2 – Options Appraisal Document
Appendix 3 – Consultation Plan
Appendix 4 – Timeline for Additional Licensing
Appendix 5 – HMO Licence Fees and Charges
Appendix 6 – Equalities Impact Assessment

Background papers:

None

Other useful documents:

Housing & Homelessness Strategy 2019 - 2024

Housing Act 2004.

Additional and Selective Licensing in the Private Rented Sector - A Guide for Local Authorities, published by the MHCLG in March 2015.

General Approval April 2015

Has it been or will it be considered by Scrutiny?

No

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

No

Will this report go to Council?

No

Report title: Additional Licensing in Coventry

1. Context (or background)

- 1.1. HMOs are properties that are occupied by a least 3 different tenants, forming more than 1 household whereby the tenants share facilities such as cooking or sanitary facilities. The definition of a HMO includes bedsits, shared houses, flats, lettings with their own facilities but which are not self-contained, and some types of poorly converted self-contained flats.
- 1.2. The Housing Act 2004 provides the power to the Council to introduce an Additional Licensing Scheme in its area. The power was intended to address the impact of poor-quality HMOs that fall outside of the mandatory licensing HMO definition and address management issues and poor property conditions.
- 1.3. In May 2020 the Council introduced a citywide Additional Licensing scheme which required all HMOs in Coventry to be licensed. The scheme runs for a period of 5 years and as such will cease on 4th May 2025.
- 1.4. Within the Act there is a legal requirement to review the scheme “*from time to time*”. To fulfil this requirement a consultation exercise was undertaken between July and October 2023 to seek views from all stakeholders on the progress of the scheme so far.
- 1.5. The review showed that the licensing scheme has made good progress in improving standards in a large number of HMOs. However, there are still a significant number of properties that remain unlicensed and there are issues with non-compliance. The full set of results from the review and consultation can be found in **Appendix 1** to the report.
- 1.6. A report was submitted to Cabinet on the 12th of December 2023 setting out the findings of the review and it was resolved that Cabinet:
 - 1) Notes and accepts the comments and recommendations from the Communities and Neighbourhoods Scrutiny Board (4).
 - 2) Notes the results of the Review of Licensing of Houses in Multiple Occupation 2023 and its findings.
 - 3) Requests that a future report be submitted to Cabinet setting out proposals for the future of the current additional licensing scheme.

2. Options considered and recommended proposal

- 2.1. A number of options have been considered in relation to the future of the HMO licensing scheme, these options were to a) renew the scheme in its entirety, b) renew the scheme in parts of the city or c) not renew the scheme.
- 2.2. The preferred option from the appraisal is to a) renew the scheme in its entirety. The full appraisal document can be seen at **Appendix 2** to the report.
- 2.3. The main reasons for supporting the option A) renewal of the scheme in its entirety are as follows:

- 2.4. HMOs are a major concern in Coventry. It is estimated that Coventry has the 14th highest number of HMOs in England and Wales. Only the large metropolitan and unitary authorities and some London Boroughs contain more. They form a high percentage of houses in the city which is attributed to high numbers of students attending both Coventry and Warwick University.
- 2.5. High house prices create a situation that puts the home ownership market beyond a large number of residents and places a burden on the PRS. Sharing accommodation is the only viable option for a large proportion of young and low-income households. Licensing ensures that the Council has a comprehensive toolkit to deal with poor conditions and issues around anti-social behaviour in all HMOs, thereby improving the living conditions for those residents in occupation and those who are affected by HMOs in the neighbourhood.
- 2.6. Planning policy has been developed by the Council to create 'mixed and balanced communities', which looks to limit the levels of HMOs in the sector so that there is a spread of sustainable and viable options for accommodation but despite all this the Council still have large numbers of HMOs in the PRS.
- 2.7. The problems associated with living in a HMO have been well documented over the years and are known to professionals working in the sector. The recent review of the current Additional HMO Licensing Scheme also indicates that a significant proportion of HMOs in the Council's area are still being managed ineffectively, with over 75,000 conditions being added to licences requiring the licence holder to carry out works to bring properties up to the appropriate standard and to manage them effectively to address issues around ASB and waste.
- 2.8. The current spread of HMOs is not concentrated in one particular area and the issues regarding this type of accommodation are widespread. Partial licensing of HMOs would likely result in an increase of HMOs in areas which were not subject to licensing or covered by the Council's Article 4 direction and leave the Council with limited options for regulating these properties.

3. Consultation Approach and Strategy

- 3.1. The approach is primarily governed by the provisions of the Housing Act 2004 and Government guidance (revised April 2010 & March 2015) and contains a statutory requirement to consult for a minimum period of 10 weeks on any proposals to designate an area subject to Additional Licensing.
- 3.2. A city wide 12-week consultation will therefore commence on 26th of February 2024 and end on 17th of May 2024, which will demonstrate that the Council has satisfied the legal requirement to take reasonable steps to consult with those people who may be affected by the designation. This includes neighbouring areas outside of the city boundary.
- 3.3. A detailed consultation plan is attached as Appendix 3 to the report setting out how the Council will meet these requirements. The strategy will be to use a mix of communication channels. The approach will also be informed by an Equalities Impact Assessment (EIA).

3.4. In summary this will include the following:

- A dedicated Let's Talk page containing an online questionnaire tailored to gauge cross section of views on the proposals;
- Focus groups with key stakeholder groups i.e. Landlords, Agents, Tenants, Residents and other key organisations such as the Police;
- Drop-in sessions in various parts of the city;
- E-communications through social media and the Council's website; and
- Workshops with Landlords and Agents to present the proposals.

3.5. Upon the completion of the consultation a report will be provided to Cabinet to consider the results of the consultation and any future structure of the scheme.

4. Timetable for implementing this decision

4.1. The proposed timetable for implementing the recommendations of this report is set out at Appendix 4 to the report .

4.2. Although this is a new designation the process is being implemented to ensure the delivery of a continuous scheme and as such the commencement date of the new scheme will be 5th May 2025. Once this designation comes into force it will also be subject to a statutory review and can only last a maximum of five years.

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

5.1. Financial implications

The financial implications associated with the recommendations are limited to the costs associated with implementing the consultation exercise and the fees developed to cover the cost of implementing and delivering the scheme.

Section 63 of the Housing Act 2004 permits the Council to require any application for a licence under Part 2 is accompanied by a licence fee and that this fee may properly cover all costs incurred by the Council in carrying out its functions.

When setting the fees and charges structure for the licensing scheme the Council can take account of the staff costs, training, administration and publicity, it is however not permitted to use licensing fees to raise revenue for other projects or areas of work.

The financial structure of the Scheme has been designed to be 'cost neutral' to cover the costs mentioned above and to ensure that no General Fund Revenue is required to support the delivery of the Scheme. The proposed criteria for each type of licence is set out in Appendix 5 to the report.

The European Union Services Directive 2006 changed the basis upon which fees for certain licences and permissions could be charged by the issuing authorities. In particular licensing authorities may not set fees that are dissuasive, and any fees

must be reasonable and proportionate to the cost of the licensing process and the issuing of the licence. These provisions have been taken into account in setting the fees.

In addition a judgement, in the Supreme Court (Hemming v Westminster case UKSC 2013/0146), has provided further clarification of the type of costs which may be taken into account when setting fees, and when fees may be payable. The council will follow this decision and therefore fees will be payable in two parts to meet with the European Directive requirements.

The fees and charges structure will be reviewed on an annual basis and published in advance of each financial year. If there is a need to increase fees to cover any potential shortfall then this will be recommended and reported through the budget setting process.

The Council will aim to continue to structure the scheme in such a way that benefits those landlords and agents that are compliant and provides incentives to improve compliance, whilst managing the opportunities for the non-compliant through higher fees and shorter licences. This will be reflected in the fees and charges structure and the eligibility and length of licences.

5.2. Legal implications

In April 2015 the then, Secretary of State for Communities and Local Government gave Local Authorities general approval regarding the approval steps for additional and selective licensing designations in England. When considering the introduction of an Additional Licensing scheme the Council must proceed through the statutory process as laid out in Section 56 and 57 and the guidance issued under the Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2015.

Section 56 of the Act places requirements upon the Council when considering a designation for additional licensing of HMOs, in that the Council must:

- Consider that a significant proportion of the HMOs of that description in the area are being managed sufficiently ineffectively as to give rise, or likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public;
- Take reasonable steps to consult with persons who are likely to be affected and consider any representations made in accordance with the consultation and not withdrawn; and
- Have regard to any information regarding the extent to which any codes of practice approved under section 233 have been complied with by persons managing HMOs in the area (these codes relate to University managed accommodation).

Section 57 provides further considerations for the Local Authority in that they should ensure that:

- Exercising the designation is consistent with the authority's overall housing strategy;
- Seek to adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti-social behavior affecting the PRS as regards combining licensing with other action taken by them or others;
- Consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of dealing with the problem or problems in question; and
- That making the designation will significantly assist them to deal with the problem or problems (whether or not they take any other course of action as well).

The General Approval provides the condition that any consultation period for the proposed designation should not be less than 10 weeks.

The guidance for the general approval also provides examples of properties being managed "*sufficiently ineffectively*" including:

- Those whose external condition and curtilage (including yards and gardens) adversely impact upon the general character and amenity of the area in which they are located;
- Those whose internal condition, such as poor amenities, overcrowding etc. adversely impact upon the health, safety and welfare of the occupiers and the landlords of these properties are failing to take appropriate steps to address the issues;
- Those where there is a significant and persistent problem of anti-social behavior affecting other residents and/or the local community and the landlords of the HMOs are not taking reasonable and lawful steps to eliminate or reduce the problems; and
- Those where the lack of management or poor management skills or practices are otherwise adversely impacting upon the welfare, health and safety of residents and/or impacting upon the wider community.

Part 2 of the Housing Act 2004 sets out the scheme for licensing HMOs in a local housing authority area. Under section 56(1) of the Act a local housing authority can designate the whole or any part or parts of its area subject to additional licensing. Where an additional licensing designation is made it applies to all HMOs specified in the designation.

6. Other implications

6.1. How will this contribute to achievement of the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

The One Coventry Plan 2022 - 2030 takes forward the main themes agreed by the Council in recent years. It reaffirms the Council's ambition of "Working together to improve our city and the lives of those who live, work and study here".

This ambition is driven through three corporate priorities which directly address the needs of the city:

- Improving outcomes and tackling inequalities within our communities
- Improving the economic prosperity of the city and regions
- Tackling the causes and consequences of climate change

The Health and Wellbeing Strategy 2023 - 2026 recognises that where we live can have a significant impact on our wellbeing. Despite improving local housing systems, the city still has high levels of homelessness; highlighting a need to work together with partners to improve the use of existing homes and empty dwellings. Household overcrowding is more prevalent in Coventry than national and regional averages. Census 2021 counts 10,196 Coventry households as overcrowded, having fewer rooms than a minimum standard for the number of occupants. This amounts to 7.7% of all households, so overcrowding rates in Coventry are higher than West Midlands (5.4%) and England overall (6.4%). However, overcrowding has reduced since 2011 when it was at 9.5% of households.

Housing & Homelessness Strategy 2019 - 2024 affirms the Council's view that housing is fundamental to the wellbeing of people, their families and their communities. Decent housing provides a stable base on which people can build their lives and build successful communities. Poor or unsuitable housing, however, can have negative impacts on many other areas of personal and community life as well as physical and mental health and wellbeing. If you do not have decent housing, everything else becomes much more difficult. Improving housing options, conditions and neighbourhoods within the city via delivery of this strategy is essential for economic growth, improving outcomes for children including their educational attainment, health and wellbeing, and community cohesion. The strategy plays a crucial role in ensuring decent homes, housing choice and support for Coventry citizens through various themes including:

Support for people and communities - Some communities are experiencing the impact of an increasing proportion of housing that is converted to multiple occupation, especially (but not exclusively) for student housing. Where HMOs are well managed and maintained, they provide an important housing option. However, where there is poor management and poor standards, this can have a detrimental effect on the occupiers and adversely impact on the local community.

Improving the use of existing homes - It is important to increase the number of homes to meet the city's growth needs, but the majority of housing available in the city is already in existence. There are approximately 142,000 existing homes in the city, compared to 24,600 additional homes to be provided over the life of the Local

Plan (to 2031). The condition of the existing housing stock is important to ensure that residents are living in decent, safe accommodation which is suited to their needs. Rented homes must be well managed by landlords who meet their responsibilities, and tenants should understand their rights and their own responsibilities too.

Improving outcomes and tackling inequalities within our communities

Additional Licensing will together with other agencies, make communities safer and reduce crime and anti-social behaviour.

It will improve health and wellbeing by providing safer and healthier rented accommodation that is well managed with reduced overcrowding and will reduce health inequalities and protect the most vulnerable by improving the standard of poorly managed homes without the need to report problems. It will help prevent homelessness due to poorly managed or rogue landlord actions.

6.2 How is risk being managed?

The statutory process required to designate an Additional Licensing scheme is being followed to ensure full compliance and a minimum 10-week consultation will be undertaken.

The consultation will be designed to ensure our compliance with legislation and statutory guidance, minimising the risk of legal challenge.

6.3 What is the impact on the organisation?

The approval of the recommendations to conduct a consultation should have limited impact on the organisation. There is no human resource, financial or ICT implications as the consultation exercise will be carried out using current resources.

The implementation and delivery of the scheme will require additional resources which have been accounted for within the fees and charges for licences.

6.4 Equalities / EIA

The report makes links to the Council's Equality and Diversity Policies and a specific Equalities Assessment has been completed for this report and is attached at Appendix 6 to the report.

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

The option of "do nothing" considered in the options appraisal is likely to result in significant impacts particularly when the Council will otherwise have very limited ability to maintain and improve HMO conditions, for example: energy efficiency and thermal performance, waste management and household waste recycling.

6.6 Implications for partner organisations?

The proposals to consult on an Additional Licensing scheme contributes towards the work of the Community Safety Partnership.

The effective operation of the consultation will enable the Council to make clear and informed decisions about the structure of the Additional Licensing scheme in the city which will directly impact on the quality and management of HMOs in the PRS and on the co-existence of HMOs with local residents and communities.

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HMO Licensing

Review of Additional HMO Licensing
Scheme 2020 - 2025

December 2023



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Introduction

This report provides the findings of a review carried out on the Additional HMO Licensing Scheme, which came into operation in Coventry on the 4th May 2020.

Why now?...

In 2019 the Council approved a report to designate the whole of its area subject to Additional Licensing. The scheme runs for a period of 5 years, it commenced on the 4th May 2020 and will cease on the 4th May 2025.

Under s.60 (3) of the Housing Act 2004 *'a local housing authority must from time to time review the operation of any designation made by them'*.

This review fulfils the responsibility under the legislation but also provides the Council with a progress report which will be used as a platform for considering the future of the scheme.

Background

The increase in the size of the Private Rented Sector (PRS) has been the most significant change in Coventry's housing market in the last ten years.

A number of market factors such as house prices, high demand and an increased population have resulted in an increased growth of HMOs with the current predictions suggesting there are now circa 6,800 HMOs.

Additional Licensing in Coventry provides a mechanism to secure the improvement of all of the HMO stock in the city and is a significant undertaking by the Council. When it was first introduced the overall purpose of the licensing scheme was to: ***'alleviate the housing situation by setting and maintaining minimum standards across the city in the most vulnerable sector of Coventry's private rental market'***.

This is also a major contributing factor to meeting the Council's Corporate priorities of:

- Improving outcomes and tackling inequalities within our communities
- Improving the economic prosperity of the city and regions
- Tackling the causes and consequences of climate change

What is an HMO?

An HMO (House in Multiple Occupation) is defined in Sections 254 and 257 of the Housing Act 2004. An HMO can be a building or part of a building if it is:

- Occupied by persons who form more than one household, and where those persons share (or lack) one or more basic amenities, such as a WC, personal washing and cooking facilities;
- A converted building containing one or more units of accommodation that do not consist entirely of self-contained flats. (There is no requirement that the occupiers share facilities);
or

- A converted building consisting entirely of self-contained flats, where the building work undertaken in connection with the conversion did not comply with the 1991 Building Regulations and more than one third of the flats are occupied under short tenancies.

The HMO must be occupied by more than one household:

- As their only or main residence
- As a refuge by persons escaping domestic violence
- During term time by students

In all cases:

- Occupation of the living accommodation must be the only use of that accommodation
- Rents are payable or other considerations are provided

Under the Housing Act 2004, a **household** comprises:

- A single person
- Co-habiting couples (whether or not of the opposite sex)
- A family (including foster children and children being cared for) and current domestic employees.

Certain types of buildings will not be HMOs for the purpose of the Housing Act. They are:

- Buildings, or parts of buildings, occupied by no more than two households, each of which comprise a single person only (for example, two-person house or flat shares)
- Buildings occupied by a resident landlord with up to two tenants
- Buildings managed or owned by a public sector body, such as the police, local authority, registered social landlords, fire and rescue authority and the NHS
- Buildings occupied by religious communities
- Student halls of residence where the education establishment has signed up to an Approved Code of Practice
- Buildings occupied entirely by freeholders or long leaseholders

Key findings of the review

Findings from the review can be seen below and further details can be found in the **Supporting Information** section of this report. Since the introduction of the Scheme the Council has:

- Issued licences for **2,750 HMOs**.
- Processed over **3,820 applications** for new and renewed licences.
- Carried out a total of **6,178 visits** to HMOs.
- Responded to **2,754 complaints** about living conditions and management of HMOs.
- Seen a **positive impact** in the reduction of the number of service requests received since the introduction of the scheme.
- Ensured all licences (new and renewed) have the mandatory conditions relating to management of the HMO and controlling **ASB and waste**.
- Attached around **11,598** discretionary conditions to achieve minimum standards at all licensed HMOs.
 - **5,232** related to Fire safety

- **1,606** related to Health and Safety, and
- **4,760** to amenities and facilities.
- Estimated that around **£1.6 million has been invested into improving HMOs** by way of complying with the licence conditions.
- Issued **1095 chase** letters/emails to landlords to make their HMO applications valid.
- Issued **78 Civil Penalties** to landlords who failed to licence their HMOs.
- Issued **222 Civil Penalties** to landlords who for breaching HMO Management Regulations.
- Issued **13 Improvement Notices** for Category 1 hazards.
- Issued **5 Prohibition Orders**.
- Made **1 Interim Management Orders** to take over control of the management of a HMO where the landlord failed to licence and put the occupant's health, safety and welfare at risk.
- Issued **1 Banning Order**.
- Accredited **501 Landlords and 84 Agents** through the Councils Landlord Accreditation Scheme (CLAS).
- Introduced **longer licences** and **fee incentives** for 'good' landlords.
- Held **6 Landlords Forums** which included presentations from external speakers.
- Issued **29 Newsletters** for Landlords providing information on the PRS including new legislation.
- Carried out **33 training** days for landlords to improve the overall management within the sector.
- Implemented a **clearer and fairer fee structure** to provide charges that reflect the amount of time spent dealing with 'good' landlords in comparison to time spent 'chasing' 'bad' landlords.

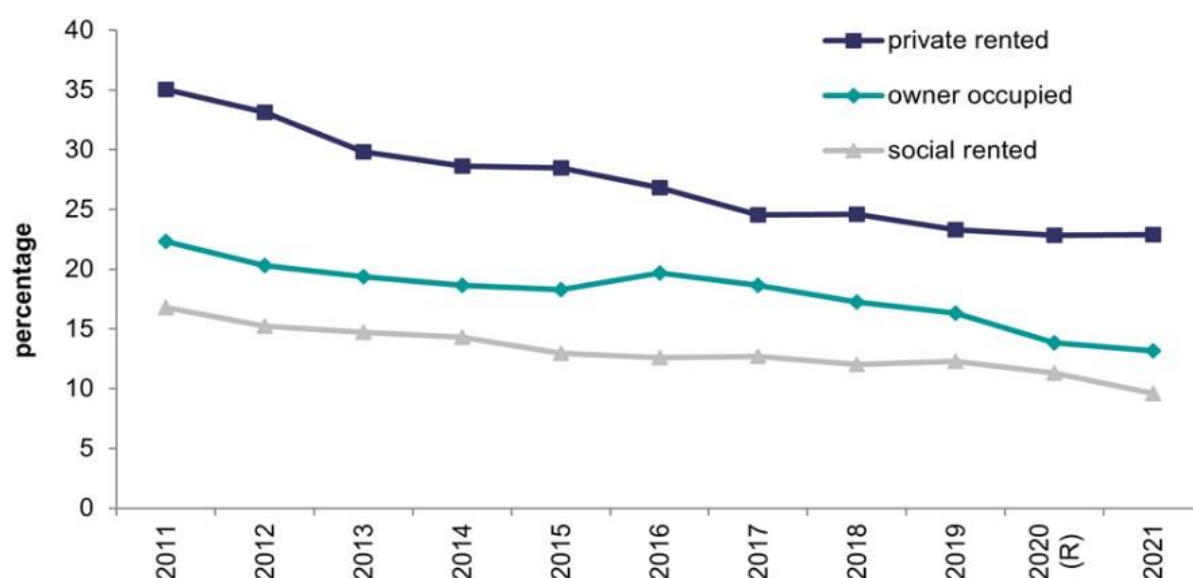
Supporting Information

The National Picture

The Office for National Statistics (ONS) projections indicate that there will be a population increase in the UK by 11 million over the next two decades. People are growing older and living longer. It is estimated that over the next 2 years the over 65's will increase by 7 million. There is also an ageing population with the number of people aged 65yrs and over projected to increase over the next 10 years by an average of 20%.

Rising house prices have continued to see many young people priced out of buying their own home. In 2021-22, 41% of those aged 25-34 were owner occupiers, a similar proportion to those privately renting (43%). Compared to 2020-21, the proportion of households aged 25-34 who are owners decreased (from 47% to 41%) and the proportion of private renters increased (from 37% to 43%).

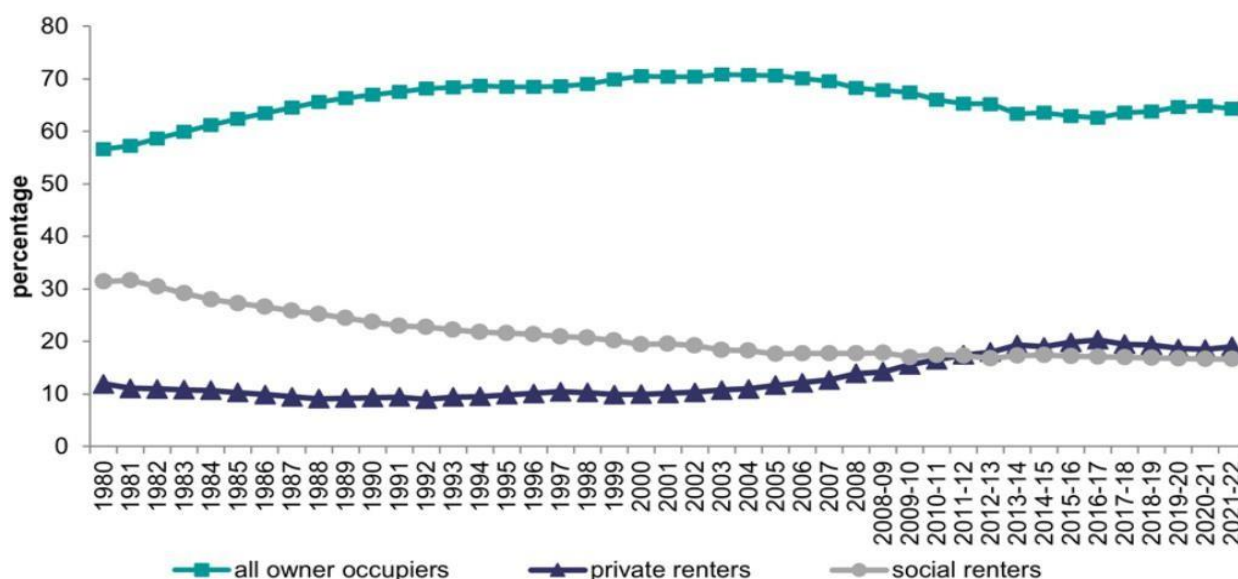
Figure 1 – Tenure profile



According to ONS nearly a third of 20–34-year-olds are living at home with their parents, in 2021, which is 28 % of the entire age group. In 2011, the number was just 24 %. For many homes ownership is no longer a tenure of choice or aspiration resulting in the PRS being the only viable housing option for most newly forming households.

Figure 2 - The table of results, from the English Housing Survey (EHS) 2021/22, below shows where the majority of 25to 34-year-olds owned their own home in 2004, however those born just a decade later are now far more likely to be renting from a landlord. As can be seen the 'tipping point' appears to be between 2011 and 2012.

Figure 2 - The table of results, from the EHS 2021/22



In 2021, 14% or 3.4 million occupied dwellings, failed to meet the Decent Homes Standard (DHS). The PRS had the highest proportion of non-decent homes (23%) while the social rented sector had the lowest (10%). Among owner occupied homes, 13% failed to meet the DHS.

The rental market has also changed considerably. Private rental prices paid by tenants in the UK increased by 5.7% in the 12 months to September 2023. This represents the largest annual percentage change since this UK data series began in January 2016, and is up from 5.6% (revised estimate) in the 12 months to August 2023. The median monthly rent recorded between April 2022 and March 2023 was £825 for England; this is the highest ever recorded.

The Coventry Picture

Coventry's population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. 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%.

Affordability of home ownership has worsened in 2022, full-time employees could expect to spend around 8.3 times their annual earnings buying a home.

The Coventry Homefinder register for social housing has approximately 8,200 applicants at any one time and all of these households have a recognised housing need. Approx 1,500 of these are in Band 1 and have an urgent housing need as set out in the Homefinder policy however there are less than 1,000 social housing lettings per annum in Coventry across all Housing Associations working in the city.

The rate of social renting in Coventry remained at 17.0%, while the rate of home ownership decreased from 60.6% to 57.4%.

The Strategic Housing Market Assessment calculated a need for an additional 42,000 homes by 2031 to meet the growth needs of Coventry, including 12,000 additional affordable homes.

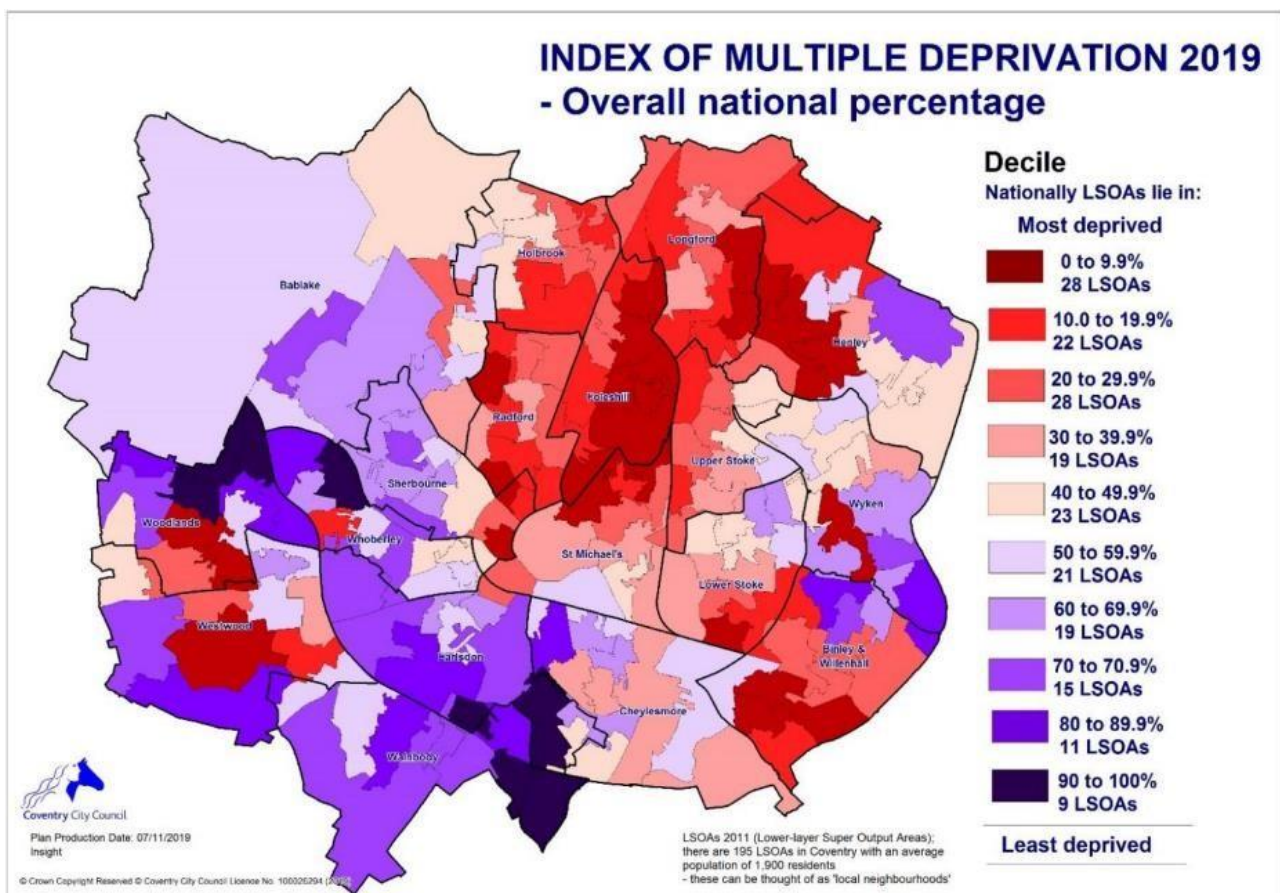
In Coventry, the percentage of private renting increased from 20.6% in 2011 to 24.7% in 2021 and the median monthly rent recorded in October 2023 was £641.60.

The English Indices of Deprivation 2019 were published by government department Ministry of Housing, Communities and Local Government (MHCLG) on the 30th of September 2019. They rank all small areas in England according to different measures of deprivation and are the most widely used measure of deprivation. Seven domains of deprivation are combined to produce the overall Index of Multiple Deprivation. Each domain contains a number of component indicators including Income, Employment, Health and Disability, Education Skills and Training, Barriers to Housing and Other Services, Crime and Living Environment.

It puts the 326 local authority districts into a rank order based on the population weighted average rank of all areas with a rank of 1 being the most deprived.

Figure 3 below shows the summary measure of the Index of Multiple Deprivation 2019 at local authority district level for Coventry.

Figure 3 - IMD Rank for Coventry in 2019



Overall, Coventry has improved notably between the IMD 2015 and the IMD 2019 relative to other local authority areas. This does not necessarily imply absolute improvement.

Depending on the way it is measured, Coventry ranks between 64th and 81st most deprived local authority area of 317 in England. 28 out of Coventry's 195 neighbourhoods (14%) are amongst the most deprived 10% in England, a reduction from 36 in the IMD 2015.

There was relative improvement across all domains apart from the living environment, the area in which Coventry fairs least well relatively. This measures the quality of housing, air quality and road traffic accidents.

The Crime domain and the Barriers to housing and services are areas in which Coventry is in the best position relatively; these domains also showed the biggest relative improvement since the IMD 2015.

There was not a strong pattern of improvement in the IMD by deprivation decile, the areas that were more deprived in 2015 improved to a similar degree to those that were less deprived originally.

Strategic Context

Section 57 (2) of the Housing Act 2004 states that before making a designation the authority must ensure that any exercise of the power is consistent with the authority's overall housing strategy.

The One Coventry Plan 2022 – 2030 takes forward the main themes agreed by the Council in recent years. It reaffirms the Council's ambition of "Working together to improve our city and the lives of those who live, work and study here".

This ambition is driven through three corporate priorities which directly address the needs of the city:

- Improving outcomes and tackling inequalities within our communities
- Improving the economic prosperity of the city and regions
- Tackling the causes and consequences of climate change

The Health and Wellbeing Strategy 2019-23 recognises that creating health, wealth and happiness requires more than simply managing people's health problems. It recognises the importance of education, good work, **affordable and appropriate housing**, leisure opportunities and a healthy environment to the quality of life of local people. We know that good quality housing for all leads to better health and wellbeing, as it affects early years outcomes, educational achievement, economic prosperity and community safety.

Housing & Homelessness Strategy 2019-24 affirms the Council's view that housing is fundamental to the wellbeing of people, their families and their communities. Decent housing provides a stable base on which people can build their lives and build successful communities. Poor or unsuitable housing, however, can have negative impacts on many other areas of personal and community life as well as physical and mental health and wellbeing. If you do not have decent housing, everything else becomes much more difficult. Improving housing options, conditions and neighbourhoods within the City via delivery of this strategy is essential for economic growth, improving outcomes

for children including their educational attainment, health and wellbeing, and community cohesion. The strategy plays a crucial role in to ensure decent homes, housing choice and support for Coventry citizens through various themes including:

Support for people and communities - Some communities are experiencing the impact of an increasing proportion of housing that is converted to multiple occupation, especially (but not exclusively) for student housing. Where HMOs are well managed and maintained, they provide an important housing option. However, where there is poor management and poor standards, this can have a detrimental effect on the occupiers and adversely impact on the local community.

Improving the use of existing homes - It is important to increase the number of homes to meet the city's growth needs, but the majority of housing available in the city is already in existence. There are approximately 142,000 existing homes in the city, compared to 24,600 additional homes to be provided over the life of the Local Plan (to 2031). 25% of properties in the city are now private rented properties, with 17% social rented and 57% owner-occupied. The condition of the existing housing stock is important to ensure that residents are living in decent, safe accommodation which is suited to their needs. Rented homes must be well managed by landlords who meet their responsibilities, and tenants should understand their rights and their own responsibilities too.

The Housing Strategy links into other key strategies, including, the Corporate Plan, the Health and Wellbeing Strategy and the Climate Change Strategy by contributing to the delivery of the key corporate priorities.

Regulatory Services is responsible for regulating the housing sector and embraces a range of service areas used by people, businesses and organisations and through this work profile ***“seeks to ensure that the public, visitors, workers and residents of Coventry have a healthy and safe work and domestic environment.”*** through education, persuasion and enforcement activities. The teams within the service are responsible for ensuring properties and landlords in the PRS meet minimum legal requirements.

The service has been working with landlords to improve conditions within the HMO stock of the city through the national mandatory HMO licensing scheme as well as statutory regulatory functions relating to maintaining minimum standards in properties in the sector. A variety of interventions have been used in Coventry to tackle problems in the HMO stock in the city. With the introduction of the Additional Licensing Scheme the service was structured in such a way as to concentrate on HMO applications with a dedicated team of Property Licensing Assistants supporting our team of Environmental Health Officers who are responsible for inspecting the HMOs and investigating non-compliance. There is a very close working relationship between the two teams. The service provided by the HMO Team is supported by a dedicated Tenancy Relations Officer who works alongside them, providing advice and assistance to landlords and agents about their rights and responsibilities.

Where serious breaches occur legal action has been taken which has led to convictions and, in some cases Banning Orders. In many cases the Tenancy Relations Officer prevents homelessness through their involvement with proactive casework.

The primary driver for all of the work carried out by the team is the protection of the health, safety and welfare of residents living in HMOs whether it is acting in an advisory role or regulatory

role through enforcement. The outcome of this work is a healthier and safer environment in which people live.

Operational partners include the various teams within Regulatory Services, Environmental Health, Housing Department and Planning and Building Control Services.

The teams within these service areas all contribute to the Council's Corporate objectives and there are also strong links with external agencies including in particular West Midlands Police and West Midlands Fire and Rescue Service.

Housing in Coventry

According to HM Land Registry the average cost of a house in Coventry was £230,604 in August 2023, which represented an 8% reduction on the previous year.

High house prices create a situation where younger people and low-income households are not able to access the owner occupation market leaving the PRS as the only viable option for accommodation.

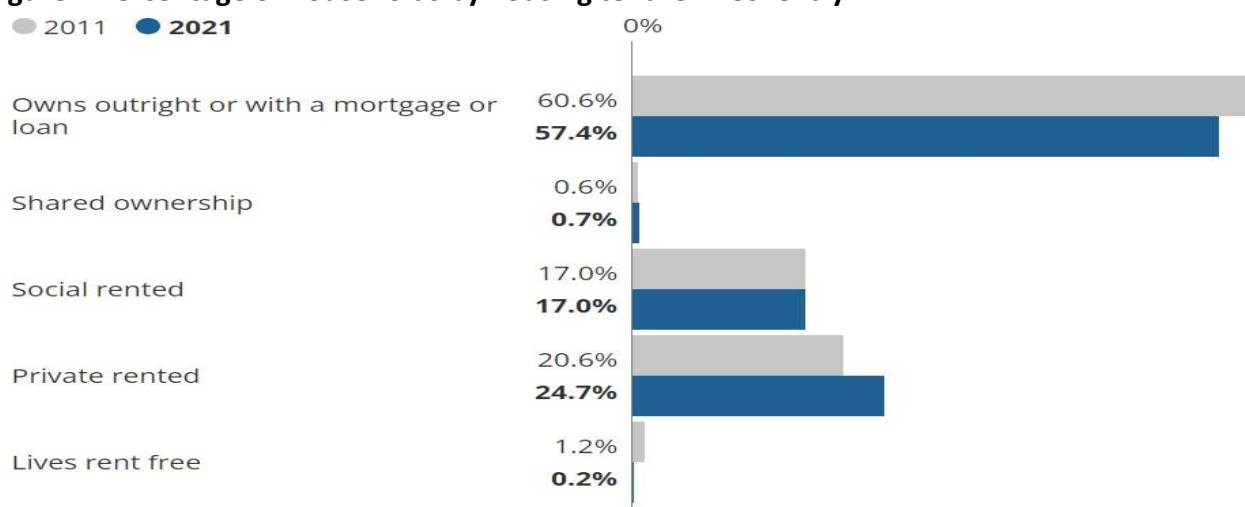
The Private Rented Sector in Coventry

The tenure profile in Coventry has changed considerably since 1981. The PRS is now larger than the social rented sector and, based on the pattern over the past ten years the potential is for it to be larger than the owner-occupied sector in the next 20 years.

In Coventry, the percentage of private renting increased from 20.6% in 2011 to 24.7% in 2021. During the same period, the percentage in nearby Warwick increased from 17.9% to 19.0%.

The rate of social renting in Coventry remained at 17.0%, while the rate of home ownership decreased from 60.6% to 57.4%

Figure 4 Percentage of households by housing tenure in Coventry



Source: Office for National Statistics – 2011 Census and Census 2021

A long-term housing shortage where demand is high and availability is low provides an opportunity for landlords to offer less than perfect accommodation without any problems of

finding a suitable tenant. The net effect can be a reduction/pushing down of housing standards in the sector.

Rental values in Coventry have increased, on average by 11% between May 2020 and October 2023 compared to 7% in England. According to the Valuation Office Agency the average weekly rent for a property in Coventry in October 2023 was £160.40.

A comparison was conducted to assess the movement of rental values for single rooms and, in particular if licensing of HMOs has had a direct impact on increasing rental values in areas which had licensing schemes and those which did not have licensing schemes.

Table 1 below provides the results of this comparison of rents in 2023 and it clearly shows that the rents are not dissimilar to increases experienced in other areas in the region and England where additional licensing schemes are not in operation.

The supply of housing in Coventry is driven by the situation where demand is high and availability is low and as already discussed, in the PRS this provides an opportunity for landlords to offer less than perfect accommodation without any problems of finding a suitable tenant.

These pressures on housing provision are inevitably going to result in high rental values so it is no surprise that increases have occurred however, there is no evidence to suggest that licensing increases rent, more likely that the undersupply in property in any given area has driven up rents as a market force.

Table 1 – Comparison of Rents in Areas with and without Licensing

Local Authority	Additional licensing scheme Y/N	Average weekly rent for single rooms in shared houses
Cambridge	Y	£120.73
Coventry	Y	£89.16
Derby	N	£83.64
Northampton	Y	£96.31
Nottingham	Y	£90.68
Oxford	Y	£105.75
Rugby & East	N	£90.75
Solihull	N	£81.52

HMOs in Coventry

HMOs are a major concern in Coventry. It is estimated that Coventry has the 14th highest number of HMOs in England and Wales. Only the large metropolitan and unitary authorities and some London Boroughs contain more.

They form a high percentage of houses in the city which is attributed to high numbers of students attending both Coventry and Warwick University.

Planning policy has been developed by the Council to create 'mixed and balanced communities', which looks to limit the levels of HMOs in the sector so that there is a spread of sustainable and viable options for accommodation but despite all this the Council still have massive numbers of HMOs in the PRS.

In April 2022, the Council published the Private Sector House Condition and Stressors Report to review housing stock in the city and assess housing stressors related to key tenures, in particular the private rented sector, which comprised a physical analysis of dwellings. It is estimated that there 6,500 HMOs within the city.

The trend over many years has been for the HMO stock to grow steadily within the city and future growth is difficult to predict, but if the PRS continues to expand at the same rate over the next decade, then the numbers of HMOs in Coventry would most likely continue to increase.

The problems associated with living in a HMO have been well documented over the years and are known to professionals working in the sector.

In the 1980's the then Department for Environment (DOE) commissioned a survey of HMOs which noted that *"four fifths lacked satisfactory means of escape – and that – risk of death or injury from fire in a HMO is ten times that in other houses"*.

The EHS, which is an annual survey conducted to *"determine people's housing circumstances and the condition and energy efficiency of housing"* Department for Communities and Local Government reported that HMOs are often old, solid wall properties with low levels of insulation and sometimes expensive electric heating systems and.... *"Section 257 HMOs pose particular problems because they are by definition older, poorly converted properties"*.

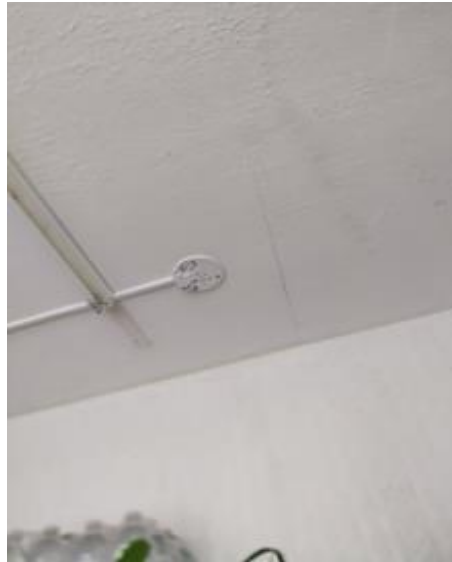
Most fire safety conditions added to licences indicated that many of the HMOs in Coventry lacking in basic fire detection and were relying upon battery operated smoke detectors. Generally, HMOs also had higher repair costs than other dwellings and although the majority had the use of basic amenities the sharing ratio of 1.5 persons was extremely prevalent, hence such a high number of conditions added to new licences, that otherwise would have been undetected without Additional Licensing.

The experience over the years, in Coventry, is that some of the worst conditions are present in HMOs. The photographs below were taken as recently as October 2023 following a complaint from a tenant about disrepair in her flat. On inspection it transpired that the property was an unlicensed HMO, with serious disrepair issues. Officers are currently taking formal action against the landlord for failing to licence the property and he has also been served with an Improvement Notice to bring the property up to standard.

Exterior of property exhibiting damp from disrepair to the draining system and broken windows and rubbish stored outside.



Fire safety issues within the building were the smoke detector and door to kitchen have been removed.



Damp and mould and disrepair to kitchen



Planning and HMOs

HMOs occupied by between three and six unrelated individuals are defined as Use Class C4 by the Town and Country Planning (Use Classes) Order 1987 (as amended). Dwellings occupied by families, or less than 3 unrelated people are defined as Use Class C3.

The government has granted planning permission in the form of permitted development rights for changes of use between these two Use Classes. Because of the potential implications of large numbers of properties in an area changing to Use Class C4, the Council has removed the permitted development right to change between use Class C3 and Use Class C4.

Notice of an Article 4 Direction proposing to remove permitted development rights to change the use of a C3 property ("dwellinghouse") to a C4 property ("house in multiple occupation") was originally given in September 2022.

The Article 4 Direction came into force across certain wards in Coventry on 30th September 2023. The Direction removes the permitted development right to change the use of a C3 property ("dwellinghouse") to a C4 property ("house in multiple occupation") without the requirement to first obtain planning permission within the following wards: Cheylesmore, Earlsdon, Foleshill, Lower Stoke, Radford, St. Michael's, Sherbourne, Wainbody, Whoberley, Westwood and Upper Stoke.

Any person wishing to convert a residential house into a HMO within the affected wards will first need to obtain planning permission for a change of use, even if the HMO will have fewer than seven tenants. Properties that were already lawfully used as HMO's with fewer than seven tenants before the 30th September 2023 will not need to make a planning application. However, if such a property ceases to be used as an HMO (for example, if it is rented to a single family) a change of use planning application will need to be made to bring the property back into use as an HMO. The Article 4 Direction has no bearing on existing or future HMO licences issued under Housing legislation.

Since the introduction of the Article 4 direction the Council has received 2 applications for C3 to sui generis which were both refused and three applications from C4 to Sui Generis (two granted and one refused). There have also been applications for change of use from C3 to bedsits which don't fall with the C4 definition and a number of applications for Lawful Development Certificates.

Licensing of HMOs

Whilst Article 4 is useful for controlling the spread of new HMOs, additional licensing is crucial in improving standards in the HMOs that currently exist in an area.

Mandatory Licensing of HMOs was introduced by the Housing Act 2004 and the Council implemented a rigorous approach to processing the requirements of the legislation, insisting that the licence must be more than just a piece of paper.

The process was used to upgrade each property to an appropriate standard with all licences being issued **after an inspection** of the HMO. This enabled the Council to have a positive impact on the condition and management of the properties.

Where compliance was not achieved, enforcement was pursued giving tenants and neighbours confidence that the City Council are serious about addressing the issues around HMOs.

The preferred stance of the Council is that licensing should apply to *all* HMOs in the same way, for example that all drivers need a driving licence. The new powers gave the Council the opportunity to make this a reality.

Prior to the designation of the Additional Licensing scheme the Council had used existing powers to their full extent, but it still wasn't enough and concluded that more needed to be done.

With the introduction of additional licensing controls applied to the whole of the HMO sector the Council was able to take a reactive and proactive approach to dealing with the sector.

Processing HMO licence applications

Although the Council has a responsibility to ***'take reasonable steps to secure that applications for licences are made'*** for HMOs, the legislation makes it clear that the responsibility to submit a valid application and licence a HMO lies squarely with the owner/landlord.

The trend over the past few years of the scheme has shown that, unlike other licensing regimes, the Council has had to take a more positive role in reminding applicants about the responsibility to licence a HMO. Between 2020 and September 2023 a total of 1095 chase letters were sent to applicants requesting them to provide requisite information to make their applications valid, with a further 67 needing to be referred for enforcement action.

Once a valid and complete application has been received the Council carries out inspections to set conditions and, in the case of a renewal application, check compliance.

Further inspections are also carried out to address any concerns raised in relation to confidence in management and issues of disrepair or poor standards.

The Council has carried out a total of 6,178 visits to HMOs to address a variety of issues.

Service requests are dealt with by the Council reactively and can include issues regarding landlord/tenant disputes, noise, rubbish and disrepair or poor conditions.

As mentioned earlier the issues associated with HMOs are far reaching and impact on the work of a variety of other teams within the service area.

Table 2 below provides a breakdown for different categories showing the comparison between the number of service requests dealt with the years before licensing and for the duration of the scheme to date. With the exception of tenancy issues and noise there has been a positive impact to the reduction in service requests. The significant increase in tenancy complaints is attributed to the appointment of a dedicated Landlord and Tenancy Liaison Officer who as part of his role has adopted a more proactive approach to such issues. A significant part of his role is to maintain tenancies, which in doing so has contributed to an estimated saving of nearly two million pounds in temporary accommodation.

Table 2 - Service Requests before and during Licensing

	2019/2020	2020/2021	2021/2022	2022/2023	2023/(Sep) 2024
Tenancy Issues	61	64	314	492	384
Noise	3719	2792	4513	4018	2374
Fly Tipping/Refuse	6962	10765	8500	6853	3052
Pests	3061	2303	2995	2457	1617
ASB	301	142	284	247	158

Energy Performance Certificates

The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 introduced a minimum energy efficiency standard of EPC E for the PRS. From 1 April 2018, private rented properties in scope of the MEES Regulations had to meet the minimum energy efficiency standard (EPC E) before they can be let on a new tenancy, unless a valid exemption has been registered.

The Council has been leading the way with new initiatives to deal with energy efficiency in HMOs and in 2021 we successfully secured funding to tackle tenants living in cold and draughty rented properties by enforcing minimum energy efficiency standards (MEES) across the city.

Making landlords improve the energy rating of their properties helps to tackle fuel poverty and ensure tenants live in a warm home with fair energy bills. Though the duration scheme the Council analysed around 4000 EPC certificates.

This will make an important contribution to the Council's carbon reduction targets because by improving energy efficiency in HMOs the PRS is making a positive step to reducing carbon emissions from buildings across the whole of the City.

Licence Conditions

Under the legislation the Council must include a range of conditions requiring the licence holder to address matters regarding gas safety, electrical appliances, furniture, smoke alarms and details of the occupants. These are applied by all Councils across England and Wales and are often referred to as the 'mandatory conditions'.

In addition to the mandatory conditions the Council also included a number of discretionary conditions which covered four broad areas relating to HMOs and included proactive measures to ensure all licences (new and renewed) had conditions relating to management of the HMO and controlling ASB and waste.

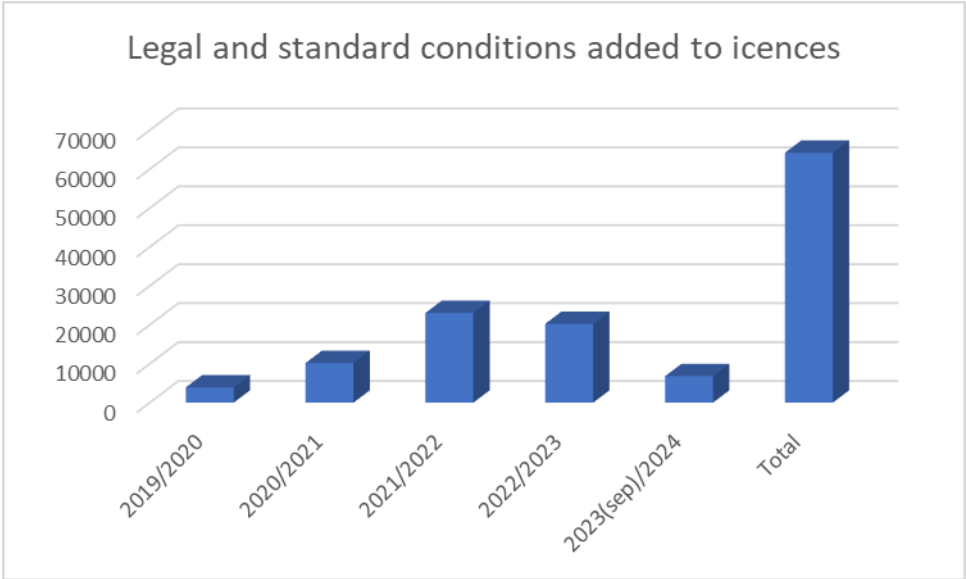
Fire Safety Conditions – these are specifically over and above the mandatory conditions and would include such matters as fire separation, additional detection and providing fire safety equipment etc.

Amenities and Facilities Conditions – these conditions would relate to cases where there were not enough facilities or amenities present within the property for the number of people living there. This typically includes providing amenities such as kitchens or bathrooms and facilities within those elements.

Health and Safety Conditions – conditions regarding health, safety and welfare matters are also applied to licences. These cover items which do not constitute a serious hazard under the Health and Safety Rating System and therefore can be addressed through the licencing process.

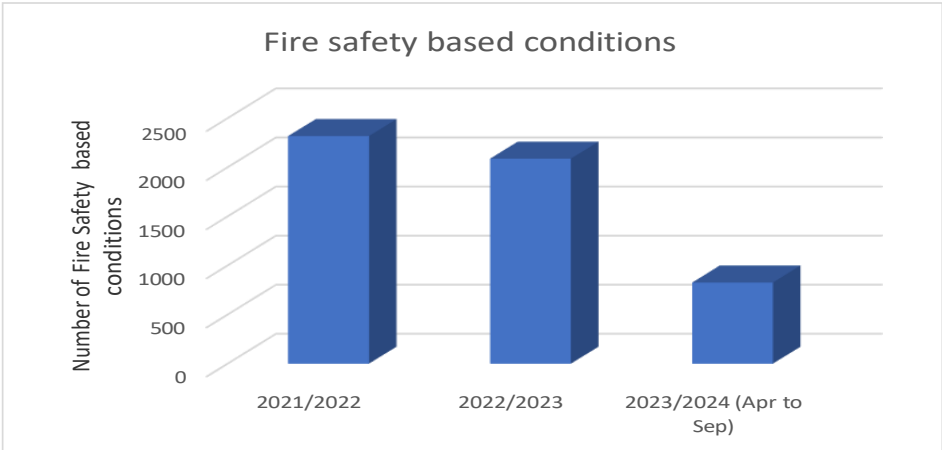
Figure 5 below shows the number of legal and standard conditions (mandatory) that have been attached to licences during the period 2019- 2023 and clearly show that after a peak of conditions regarding management issues in 2020-2021, but there has been a gradual improvement in this area thereafter. It is however clear that there is still some work to do to address management issues in HMOs.

Figure 5 – Legal and Standard



Figures 6, 7 and 8 below provide a breakdown of those discretionary conditions that were required on licences to improve conditions relating to fire safety, health and safety and amenities and facilities.

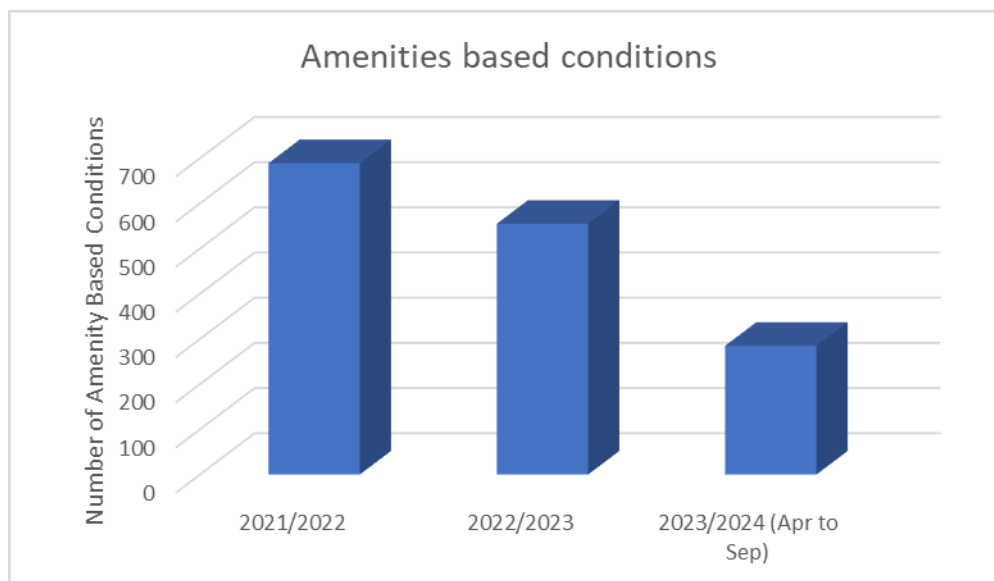
Figure 6 – Fire safety conditions



The peak of conditions relating to fire safety suggests that during the early years of the scheme there was a lack of fire precautions in HMOs. The fall in numbers over the duration of the scheme indicates improvements in fire safety are being addressed through compliance of these conditions. It is unlikely that these improvements would have been achieved to this extent without the conditions being attached to licences and the figure relating to the level of conditions still required is significantly higher than when the scheme started.

Conditions regarding basic amenities and facilities such as sufficient toilets, kitchen and bathing facilities are a fundamental issue in HMOs because the higher number of people sharing the greater level of amenities required.

Figure 7 – Amenities and Facilities conditions

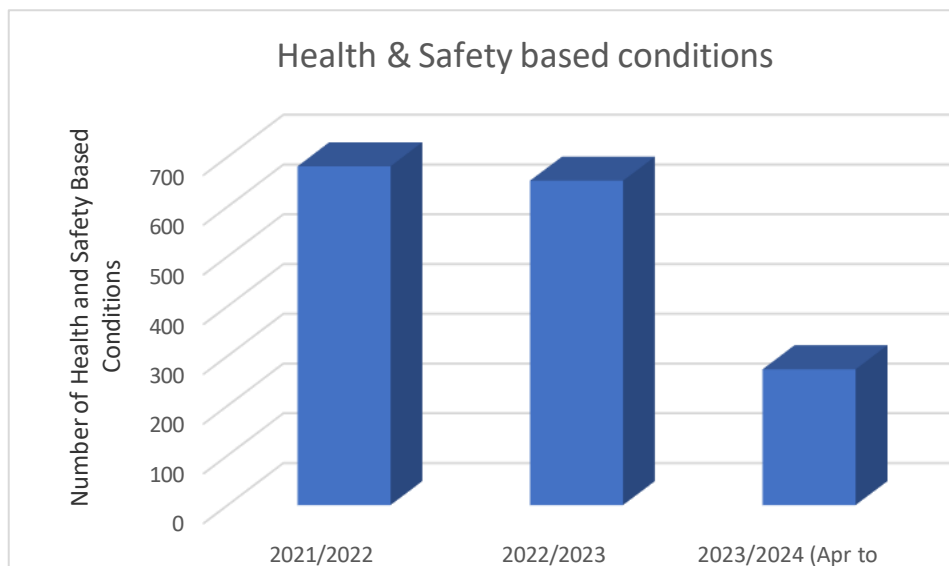


This figure suggests that in the early years of the scheme there were a large number of properties with insufficient facilities and over the period of 3 years this has reduced to a reasonable level.

The health and safety of occupants in HMOs is a major concern that can be addressed through applying licence conditions or assessing the property to determine if there are any hazards present under the Housing Health and Safety Rating System. Where hazards are present, and considered serious enough, the Council is under a duty to pursue action under HHSRS. This would be done through the service of legal notices and orders.

These conditions therefore relate to cases where the Council considered it was not appropriate to pursue this separate action. It does however have to be borne in mind that these conditions are matters which have a direct impact on the health, safety and welfare of occupiers of HMOs and so will typically relate to factors regarding disrepair and other lower hazard rated issues.

Figure 8 – Health and Safety conditions



This figure, relating to health and safety conditions, paints a similar picture to that of all of the other areas, in that there was a peak of conditions of this nature in the early stages of the scheme and a fall, indicating gradual compliance. The level of conditions relating to health and safety matters is still at a level which raises concern and shows that there is still some work to do around compliance in this area.

In order to assess this the Council undertakes compliance visits and recorded various factors relating to compliance/ non-compliance. These ranged from whether works required on the licence had been completed and whether there were any issues regarding the completion or addition of conditions.

The results can be seen below in Figures 9 and 10 below.

Figure 9 – Compliance of conditions

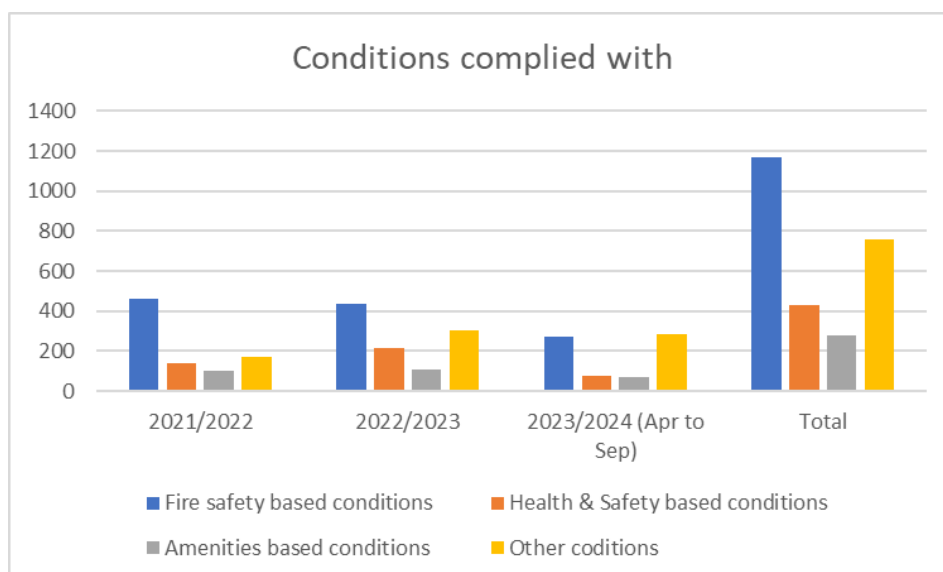
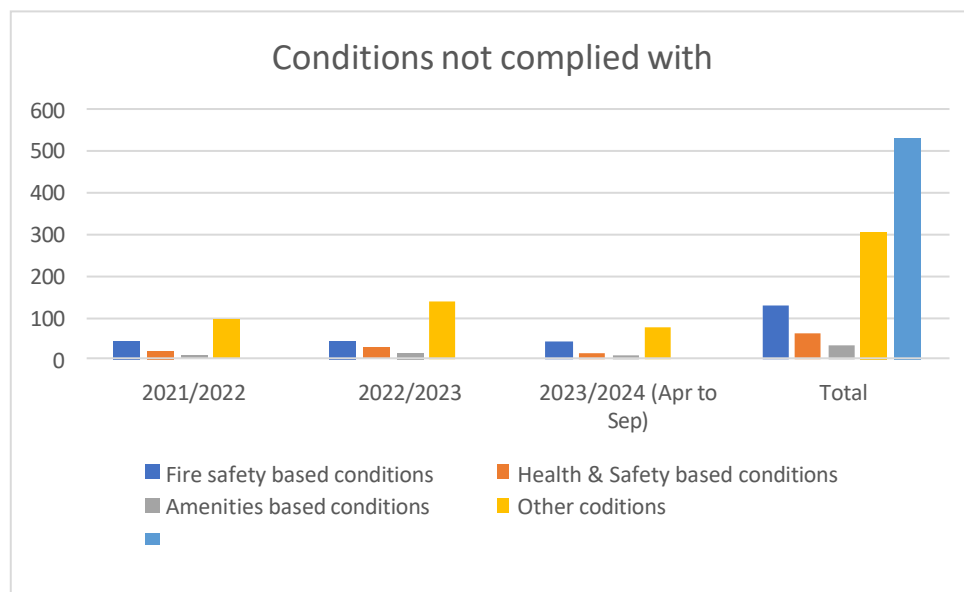
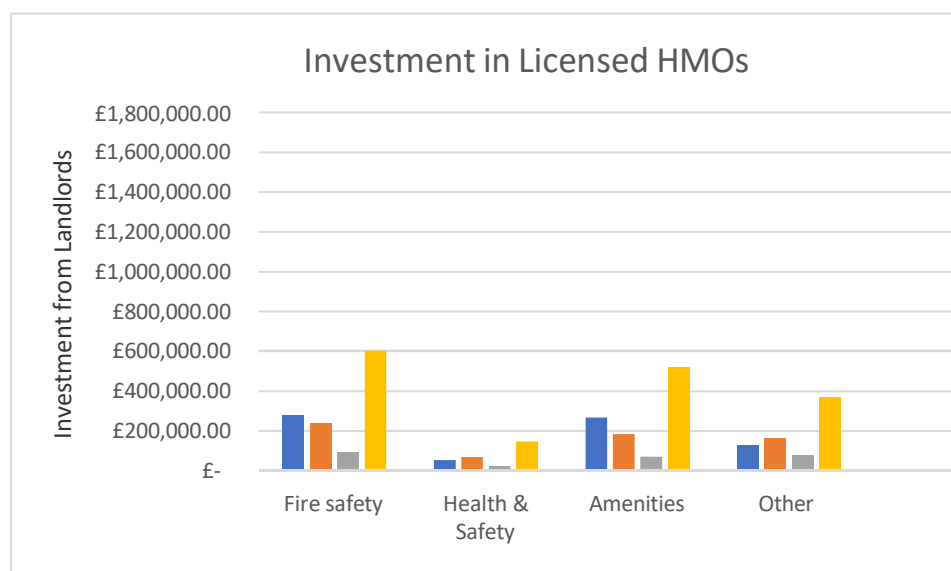


Figure 10 – Non-compliance of conditions



In order to assess any potential financial investment in the city a cost was attached to the type of work carried out to comply with conditions and an estimate on investment was calculated as a result. Overall, it is estimated that since the introduction of licensing there has been approximately £1.6 million invested in HMOs in the city. The average investment for each year is shown in Figure 11 below.

Figure 11 - Investment in Licensed HMOs during 2021 – Sep 2023



HMO Fees and Charges

The cost of an HMO licence is different across local authority areas. The government did not set a specific fee or set a limit as to how much each council can charge and it is up to the Council to calculate what it costs to implement HMO licensing. This will include consideration of staff costs, training, inspection and administration and can include publicity.

The Council then sets its licence fees on this basis and if appropriate may decide to subsidise licence fees in some cases. They are not, however allowed to use licensing fees to raise revenue for other projects or areas of work.

The Council introduced the Scheme as a self- financing project and has reviewed the fees and charge's structure regularly throughout the life of the scheme.

During a period of public engagement prior to the scheme's inception in 2020 the consultation responses raised several queries around the Council's fee structure at this time and the fairness of a scheme that proposed to treat all landlords the same whether compliant or non-compliant.

A range of new licences fees were also introduced that acknowledged the difference in the time spent by the Council dealing with complete and valid applications that were submitted on time by landlords and those where the Council had to chase payment or documentation.

The Council now issues licences for one, two- and five-year periods.

A Higher Rate New Application fee for a one-year licence was introduced where the HMO has been found to be operating unlicensed for more than 12 weeks.

The Council also introduced a five-year licence for landlords and agents who are accredited through Coventry City Councils Landlord Accreditation Scheme (CLAS).

To be eligible for a given length of licence, the landlord must meet all the requisite criteria at the point of application.

The main reason for adopting these changes was that the Council had to spend a lot more time in dealing with licence applications where the owner had not been forthcoming with their application or had not provided a valid application.

The aim of this fee structure was also to try and encourage landlords to become better through joining the accreditation schemes and attending training which would enable them to be more competent and capable of managing HMOs appropriately.

The Council also wanted to reward good landlords who had already licensed and where there was less work with administering the licence and ensuring compliance.

Where landlords had been prosecuted or reluctant to become accredited, we would encourage them to use accredited agents, who have the experience and expertise to improve and manage properties, to manage them on their behalf and therefore take advantage of the five-year licence.

Landlord Accreditation

The Council operates the Coventry Landlord Accreditation Scheme (CLAS) which aims to improve the condition and management of the private rented sector in Coventry.

The scheme comprises an element of self-regulation and accordingly relies on a degree of goodwill and trust on the parts of Landlords, Letting Agents, tenants and the local authority.

The scheme applies to the private rented sector only and not to local authority owned or Housing Association properties where other Service Level Agreements apply.

Under the Scheme it is a requirement that:

- (a) the Landlord or Letting Agent is a 'Fit and Proper' person;
- (b) the physical condition of all the properties they own or manage meet minimum legal standards and planning and building control requirements;
- (c) management practices are fair and reasonable and meet the management code of practice requirements;
- (d) community relations are maintained, including waste management at the property; and
- (e) our Local Commitment policy is compiled with you have ensured that all properties owned or managed by yourself have achieved the highest EPC ratings possible, within reason, for the property construction type

Compliance with the scheme will ensure that:

- Landlords, Letting Agents, tenants and local residents enjoy the benefits of good property conditions, competent management standards and considerate neighbourly behaviour;
- Misunderstandings and disputes are reduced;
- The Council's One Coventry Plan will be actively promoted;
- Where problems do occur, they are promptly resolved; and
- Landlords and Agents of privately rented accommodation must ensure they manage their properties in a business-like manner and have knowledge of the requirements of private renting and the primary legislation under the Housing Act 2004.

The Council has put together a training course involving workshops delivering a comprehensive understanding of the legislation and technical aspects of managing a property, including in particular:

- Management Regulations - An overview of the requirements of the landlord's statutory requirements under the Management of Houses in Multiple Occupation (England) Regulations 2006;
- The Housing Health & Safety Rating System, (HHSRS) - An introduction and overview of the HHSRS and the 29 associated hazards; emphasis will be placed on the more often encountered deficiencies. Understanding the concept of Categories and how to mitigate Category 1 hazards in accordance with the requirements of the HHSRS Operating Guidance;
- HMO Licensing - The requirements of the HMO licensing scheme, applications, documentation etc;
- Tenancy Relations - An introduction to the legal requirements of assured shorthold tenancy agreements and the requirements for possession etc; and
- Electrical Safety Standards – An overview of the requirements under The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020

Accredited Landlords and Agents are required to attend the one-day training course within three to six months of becoming accredited.

As previously mentioned, accredited landlords and agents can take advantage of extended licences and lower fees because the Council acknowledges that they are more effective at managing their properties and meeting the requirements of licensing with minimal intervention from the Council.

585 Landlords and Agents have taken up accreditation, the most being during the first year of the scheme when the Council introduced the 'new' five-year licence for accredited landlords.

Accreditation provides an opportunity for landlords to understand their legal responsibilities and provides them with practical advice on how to become better at managing and maintaining properties in the PRS under their control without the need for the Council to intervene.

Enforcement in HMOs

Prior the start of the scheme the Council's intervention in the small HMO sector was limited to a reactive complaint response service with action by other departments and agencies on a largely ad hoc basis. A reactive service is essentially generated by the tenant making a complaint about the condition of the property, all too often tenants are concerned that making complaints will result in eviction and therefore some of the very worst of the issues go undetected.

A reactive response would mainly focus on condition of property and not necessarily the management which is often the cause of concern. This approach only scratched the surface of the problems associated with a growing HMO sector in Coventry and licensing provided the Council with enhanced powers to deal with HMOs in a more proactive and focussed way.

It enabled the Council to conduct reactive and proactive visits to address concerns about HMOs. This has resulted in over 6,178 visits being carried out to HMOs.

Over 75,000 conditions have been added to licences requiring the licence holder to carry out works to bring properties up to the appropriate standard and to manage them effectively. This provided a level playing field for all landlords and licence holders making them more accountable for the management and improvement of HMOs.

Where non-compliance is found the Council has a mechanism to resolve these issues either through legal action which may result in the licence holder losing their licence and their ability to run HMOs or through further licensing controls. The Council has only had to take formal action in a handful of cases for non-compliance because it has found the possibility of losing a licence is of great concern to most landlords and they will take steps to remedy the problems referred to them without the need for legal intervention.

The Council is also able to focus its resources on tracking down those landlords who are operating unlicensed or ineffectively managed properties. This has resulted in 1906 proactive investigations being carried out on HMOs.

These landlords are encouraged to find an agent or another suitable person to be the licence holder and cooperate with them to improve the property and its management. The fees and charge's structure has been developed to encourage landlords to become accredited and take advantage of fee incentives.

If a landlord fails to heed warnings about problems, then the Council has applied enforcement and taken formal action where the problem is serious enough and it would be in the public interest to do so. This has resulted in 78 Civil Penalties issued to landlords who failed to licence their HMOs, 222 Civil Penalties to landlords for breaching HMO Management Regulations and 6 formal cautions. In the most extreme case one landlord was banned from letting or managing properties.

Before issuing an HMO licence, the Housing Act 2004 states that the council must be satisfied that the proposed licence holder (and manager) of the property are fit and proper person(s). The test is designed to ensure that those responsible for holding the licence and managing the property are of sufficient integrity and good character to be involved in the management of an HMO and that as such, they do not pose a risk to the welfare or safety of persons occupying the property.

Where there has been a contravention of any provision of the law relating to housing or of landlord and tenant law, the landlord is no longer considered to be a “fit and proper person”. Their licence is revoked and unless they pay another application fee for a suitable person to take over the licence the Council issues an interim management order and takes over control of the property. This approach has been adopted on one such occasion.

Consultation exercise

Under s.60 (3) of the Housing Act 2004 *‘a local housing authority must from time to time review the operation of any designation made by them’*.

From July to October 2023, the Property Licensing Team undertook a consultation exercise with various stakeholders to measure the potential impact of the licensing scheme. An online survey was hosted on Let’s Talk Coventry for 3 months. As well as this drop in sessions were held across the whole city, with at least 1 session held in each of the 18 wards. The results of this consultation can be found in Appendix 1.

The Way Forward

The Additional Licensing Scheme in Coventry will have been in operation for 5 years on the 4th of May 2025. This creates a situation where the Council needs to review its success, learn lessons and to use these to determine what action should be taken in the future.

Under section 60(2) of the Act the expiry time must be no later than five years after the date on which the designation comes into force.

Under s.60 (3) of the Housing Act 2004 *‘a local housing authority must from time to time review the operation of any designation made by them’*.

In order for the Council to ‘renew’ the scheme it must proceed through the statutory process as laid out in Section 56 and 57 and the guidance issued under the Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2010.

Section 56 of the Act places requirements upon the Local Housing Authority when considering a designation for additional licensing of HMOs, in that the Council must:

- Consider that a significant proportion of the HMOs of that description in the area are being managed sufficiently ineffectively as to give rise, or likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public;
- Take reasonable steps to consult with persons who are likely to be affected and consider any representations made in accordance with the consultation and not withdrawn; and
- Have regard to any information regarding the extent to which any codes of practice approved under section 233 have been complied with by persons managing HMOs in the area (these codes relate to University managed accommodation).

Section 57 provides further considerations for the local authority in that they should ensure that:

- Exercising the designation is consistent with the authority's overall housing strategy;
- Seek to adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti-social behavior affecting the private rented sector as regards combining licensing with other action taken by them or others;
- Consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of dealing with the problem or problems in question; and
- That making the designation will significantly assist them to deal with the problem or problems (whether or not they take any other course of action as well).

The Department for Communities and Local Government General Approval provides the condition that any consultation period for the proposed designation should not be less than 10 weeks.

In February 2010 the DCLG produced general guidance around the approval steps for additional and selective licensing designations in England.

This document provides examples of properties being managed "*sufficiently ineffectively*" including:

- Those whose external condition and curtilage (including yards and gardens) adversely impact upon the general character and amenity of the area in which they are located;
- Those whose internal condition, such as poor amenities, overcrowding etc. adversely impact upon the health, safety and welfare of the occupiers and the landlords of these properties are failing to take appropriate steps to address the issues;
- Those where there is a significant and persistent problem of anti-social behavior affecting other residents and/or the local community and the landlords of the HMOs are not taking reasonable and lawful steps to eliminate or reduce the problems; and
- Those where the lack of management or poor management skills or practices are otherwise adversely impacting upon the welfare, health and safety of residents and/or impacting upon the wider community.

HMO ADDITIONAL LICENSING CONSULTATION REPORT OCTOBER 2023

Kristi Larsen
Insight Team

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landlords were asked: How many HMOs do you own?	7
Letting agents were asked the following: How many HMOs do you let/manage?	7
If you have indicated that you are living or have lived in a HMO in Coventry in the past five years then please indicate whether you have had personal experience of any of the following?	8
Please indicate how strongly you agree or disagree with the following statements? Additional licensing in Coventry has	9
The Council is seeking views as to whether it should renew the Additional Licensing scheme in 2025, which again would include all HMOs within the city. Please indicate how strongly you agree or disagree with this proposal?	10
Which of the following statements apply to Coventry. Please choose all that apply	11
Finally, do you have any comments you would like to make on the Additional Licensing Scheme?	12
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There were 197 responses.

- The majority of responses were received from respondents who did not live in Coventry.
- These respondents lived in various locations, Warwickshire County Council area and areas around London.
- Of those respondents who did live in Coventry, the most were received from Earlsdon, Wainbody and Lower Stoke.
- The majority of respondents were responding as members of the public (57%), followed by landlords (29%)
- 78% of respondents were aware that Coventry has introduced an Additional Licensing Scheme
- The majority of landlords responding owned between 1 and 10 HMOs, (89%)
- 5 letting agencies responded and ranged from 1-10 to 21-50 HMOs managed.
- Fear of reporting repairs for fear of being evicted, deposit issues and intimidation and harassment were experienced the most by tenants but the numbers responding to this question was very low.
- The statements that received most agreement were that additional licensing in Coventry has ensured that privately rented HMO properties are better maintained and managed, that additional licensing has helped to improve living conditions in HMOs across the city and that the scheme has helped to improve the overall management of HMOs.
- The statements that received most disagreement were that additional licensing in Coventry has dealt with the problems associated with HMOS or helped reduced anti-social behaviour.
- The majority of respondents strongly agree with the proposal to renew the additional licensing scheme at 43%, the total of those in agreement is 61%.
- 30% of respondents disagreed with the proposal to renew, with 1 in 5 strongly disagreeing.
- The majority of respondents feel that the Council does not punish rogue landlords enough, 118 responses. This is followed by 79 responses thinking that the fee for a licence should be reduced for compliant landlords.
- Encouragingly, 61 responses think that HMOs in Coventry are better managed now than 5 years ago.
- The statement that received the fewest agreement was that the additional licensing scheme has been a success and is no longer needed with 18 responses.

- A large number of the open-ended comments agreed that the Additional Licensing Scheme has been successful, however a number stressed that it needed to be enforced to ensure success.
- There was a feeling that the Council did not have enough resources to ensure enforcement of the scheme and that the Council are making it too bureaucratic.
- There was general consensus that there are too many HMOs across Coventry and that many that are here are not well maintained and have negative impacts on the local community.
- Just over a quarter (29%) of respondents were aged 44 and under. 49% were female.
- Just under half (49%) stated they were Christian and 81% were White British. 10% stated they were disabled.

INTRODUCTION

Coventry City Council's current Additional HMO Licensing scheme expires on 4th May 2025, and the Council needs to carry out an in-depth review of the scheme.

The consultation was open from July 3rd until October 2nd, 2023. The feedback gathered from stakeholders will inform a full options appraisal for the future of the scheme.

RESPONSE RATE

An online survey was hosted on Let's Talk Coventry for 3 months. As well as this drop in sessions were held across the whole city, at least 1 session held in each of the 18 wards.

197 surveys were completed.

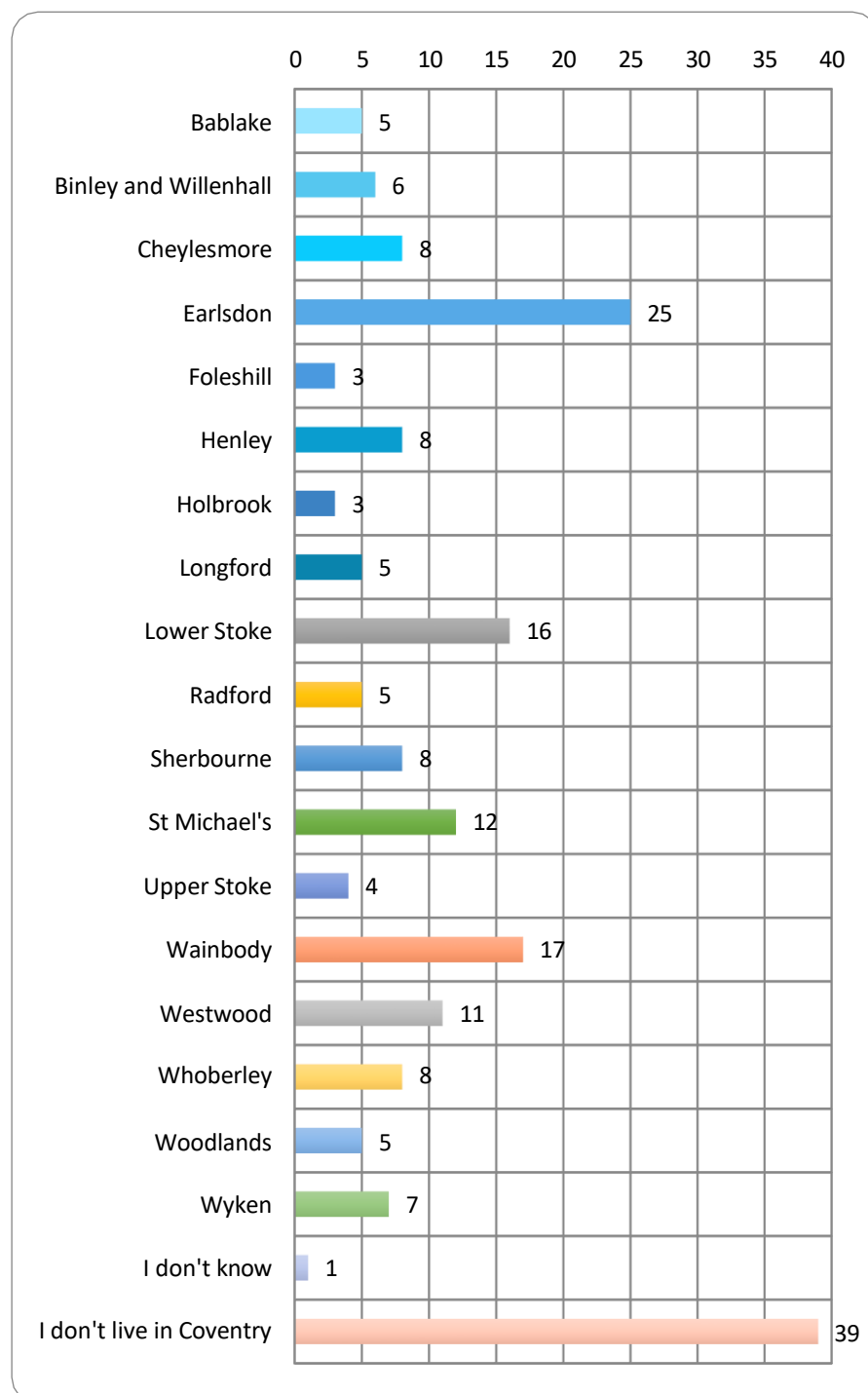
Engaged: 197 respondents filled in the survey.

Informed: 446 people downloaded at least one document

Aware: 951 people visited the page.

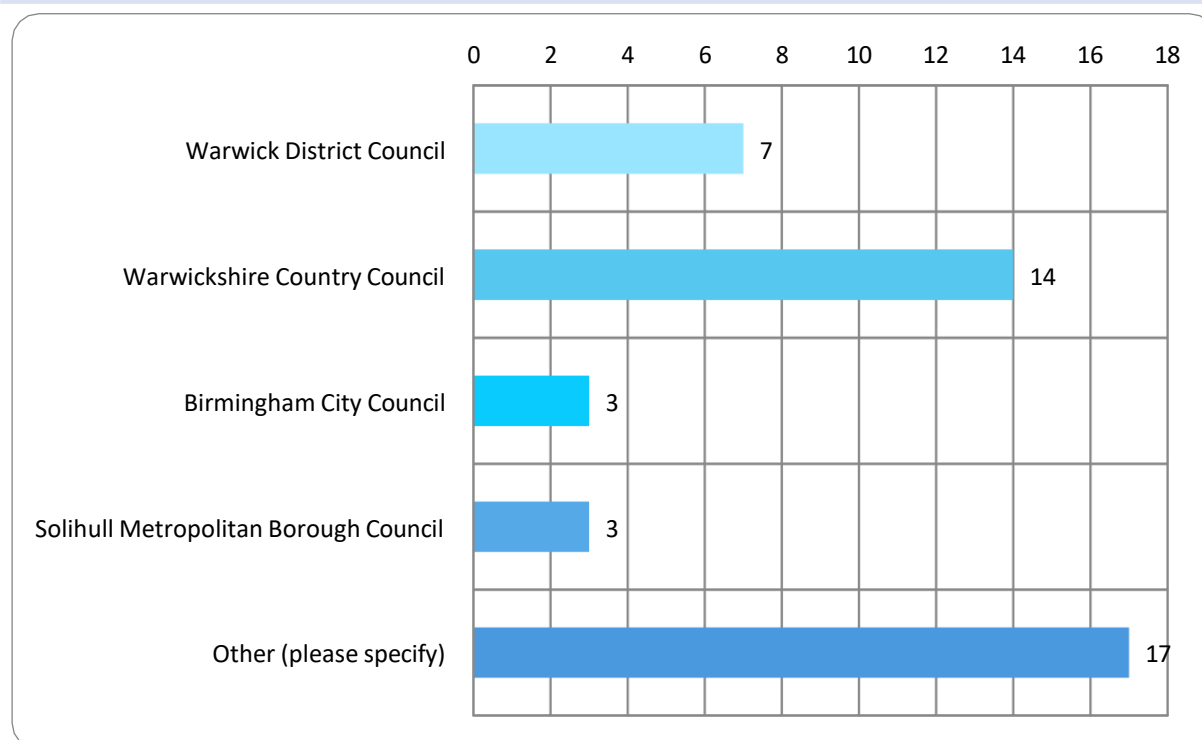
SURVEY FINDINGS

WHAT AREA OF COVENTRY DO YOU LIVE IN?



Most respondents were from outside of Coventry (39). Looking at respondents from Coventry, most were from Earlsdon (25), followed by Wainbody (17) and Lower Stoke (16).

IF YOU LIVE OUTSIDE COVENTRY WHICH LOCAL AUTHORITY AREA, DO YOU LIVE IN?



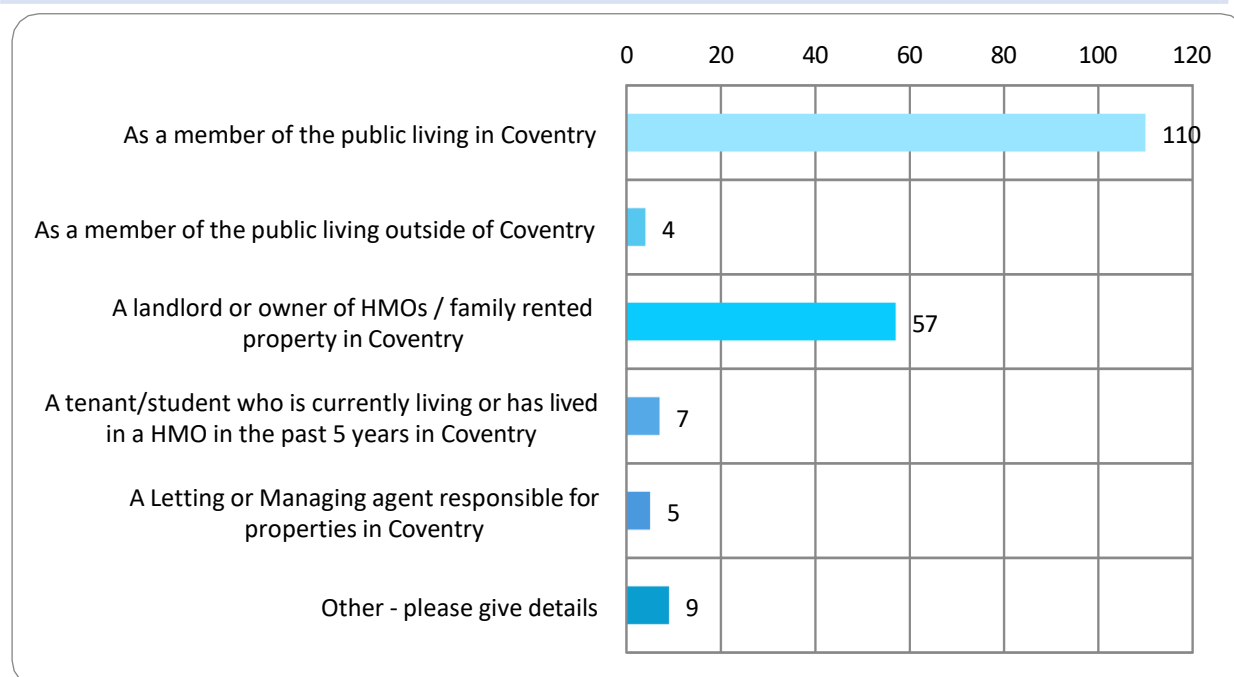
The majority of respondents who stated other location were from London and the surrounding area. Other areas stated were Market Harborough, Walsall, North Wiltshire, Luton, Buckinghamshire and South West Devon.

ARE YOU AWARE THAT COVENTRY CITY COUNCIL INTRODUCED A LICENSING SCHEME FOR ALL HMOS IN MAY 2020?

	Number	%
Yes	152	78%
No	45	22%

78% of respondents were aware of the introduction of the scheme.

HOW ARE YOU RESPONDING TO THIS CONSULTATION ?



The majority of respondents are responding as members of the public that live in Coventry (110), that is 57%. The next largest category is landlords (57) at 29%.

Those that stated other were predominantly representatives of charities that work in relation to housing, as well as a consultant on fire risk assessment and representatives from Council specific teams.

LANDLORDS WERE ASKED: HOW MANY HMOS DO YOU OWN?

No of HMOs	No of Responses
1-10	51
11-20	2

53 of the landlords owned HMOS, 4 landlords completing the survey did not own any HMOS currently.

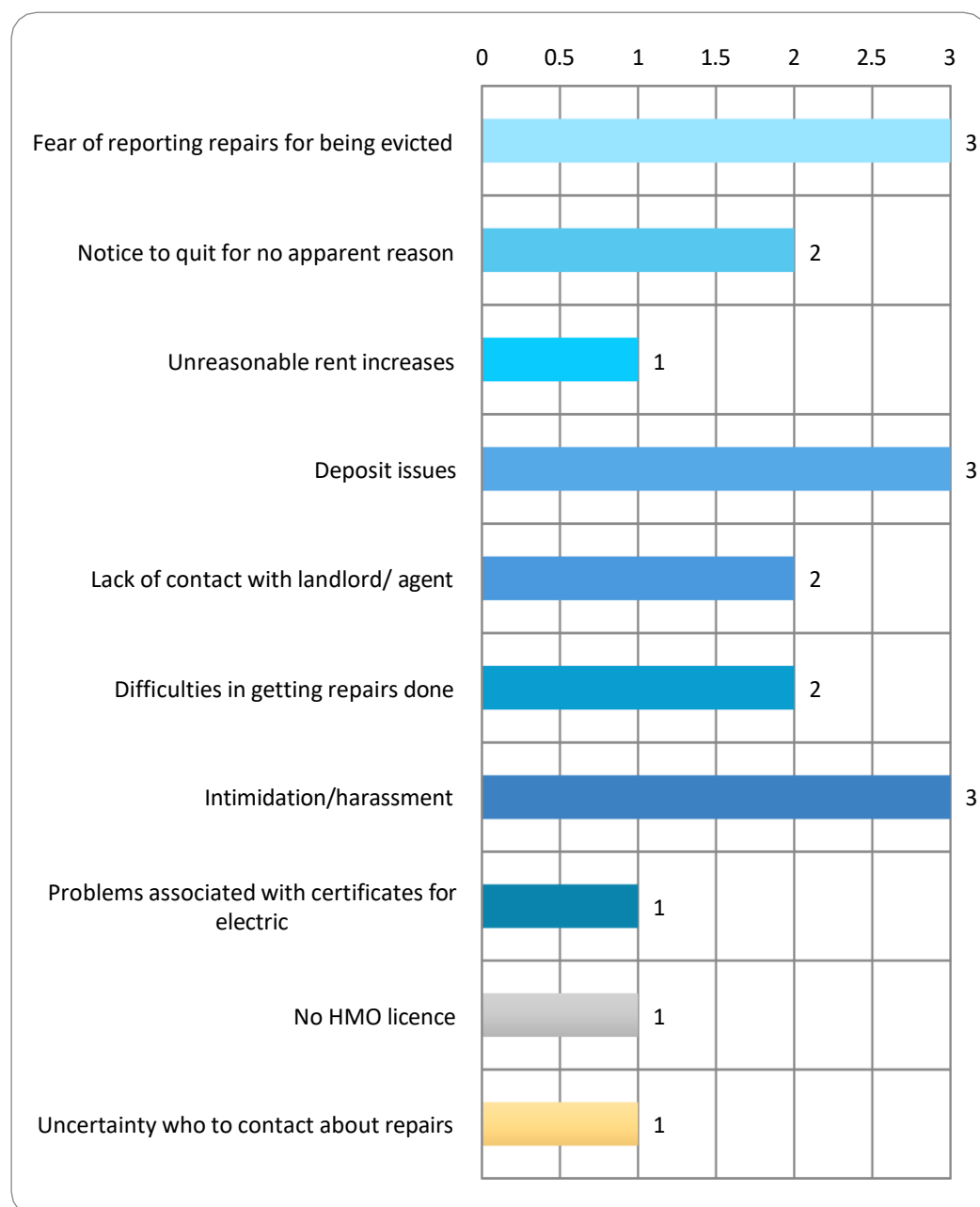
Most of the landlords owned between 1 and 10 HMOS, only 2 landlords owned between 11 and 20.

LETTING AGENTS WERE ASKED THE FOLLOWING: HOW MANY HMOS DO YOU LET/MANAGE?

No of HMOs	No of responses
1-10	2
11-20	2
21-50	1

All 5 agencies responded to this question and they are split over the 3 categories.

IF YOU HAVE INDICATED THAT YOU ARE LIVING OR HAVE LIVED IN AN HMO IN COVENTRY IN THE PAST FIVE YEARS THEN PLEASE INDICATE WHETHER YOU HAVE HAD PERSONAL EXPERIENCE OF ANY OF THE FOLLOWING?



The numbers responding to this question are very low but fear of reporting repairs for fear of being evicted, deposit issues and intimidation and harassment were experienced the most.

PLEASE INDICATE HOW STRONGLY YOU AGREE OR DISAGREE WITH THE FOLLOWING STATEMENTS? ADDITIONAL LICENSING IN COVENTRY HAS.....

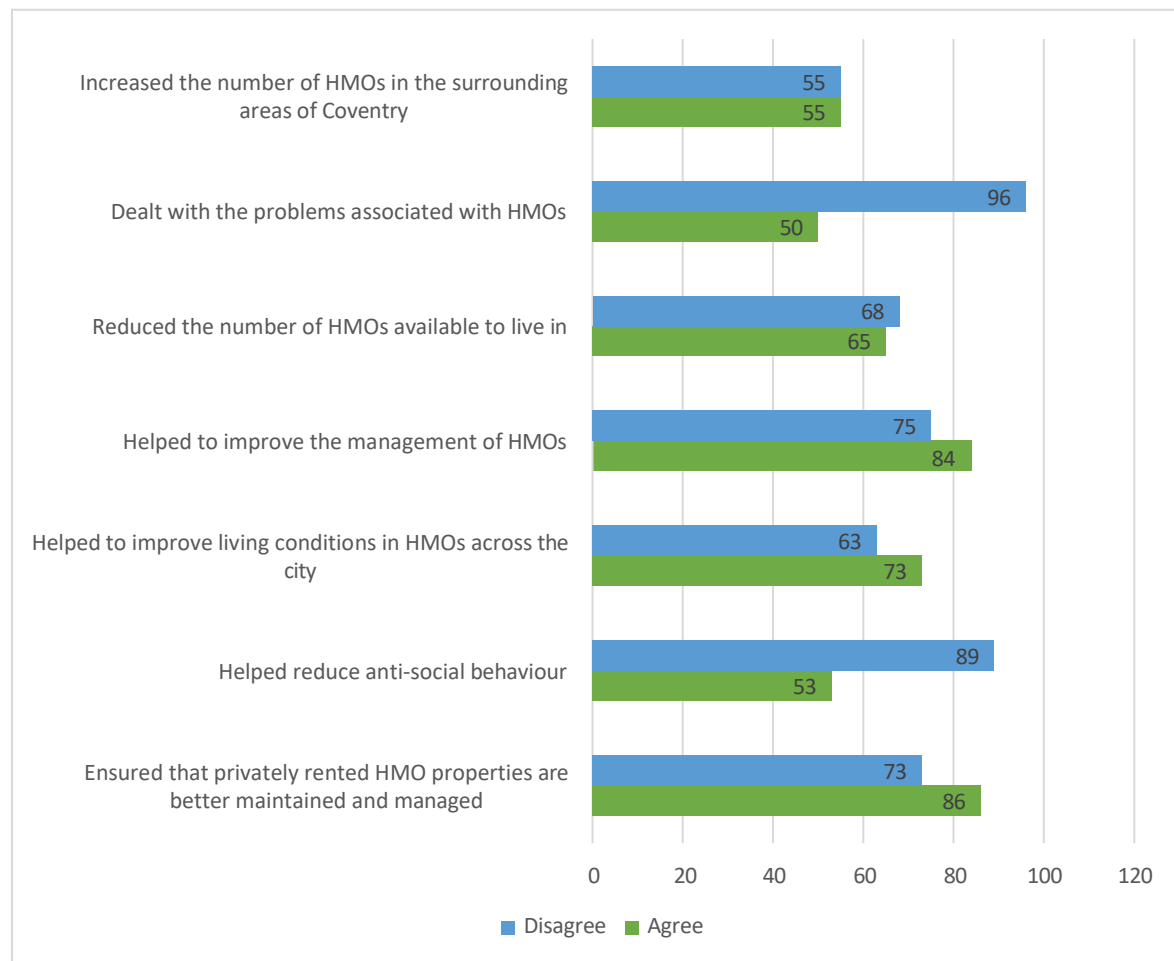
	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Dealt with the problems associated with HMOs	25	25	50	55	41
Ensured that privately rented HMO properties are better maintained and managed	40	46	38	42	31
Helped reduce anti-social behaviour	23	30	55	48	41
Helped to improve living conditions in HMOs across the city	37	36	60	38	25
Helped to improve the management of HMOs	30	54	37	46	29
Reduced the number of HMOs available to live in	39	26	63	32	36
Dealt with the problems associated with HMOs	25	25	50	55	41
Increased the number of HMOs in the surrounding areas of Coventry	24	31	83	28	27

The statements that received most agreement were that additional licensing in Coventry has ensured that privately rented HMO properties are better maintained and managed, that additional licensing has helped to improve living conditions in HMOs across the city and that the scheme has helped to improve the overall management of HMOs.

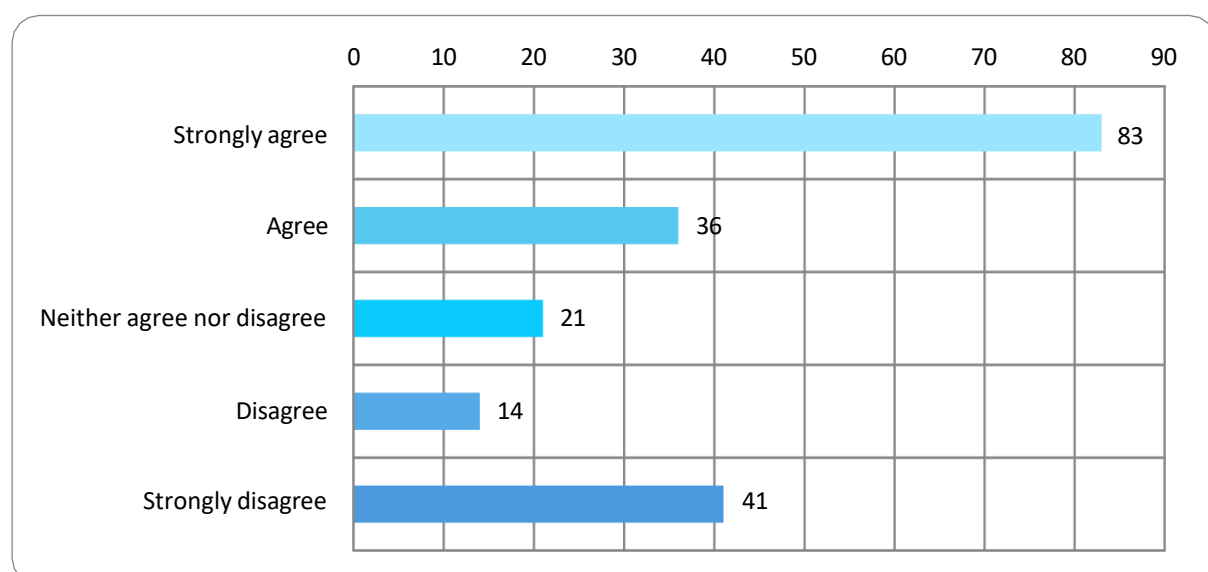
For a large number of the statements the majority of respondents chose the neutral option, neither agree nor disagree.

The statements that received most disagreement were that additional licensing in Coventry has dealt with the problems associated with HMOs or helped reduced anti-social behaviour.

The graph below highlights those that agree (strongly agree + agree) and those that disagree (disagree+ strongly disagree) with each statement, with the neutral responses removed.



THE COUNCIL IS SEEKING VIEWS AS TO WHETHER IT SHOULD RENEW THE ADDITIONAL LICENSING SCHEME IN 2025, WHICH AGAIN WOULD INCLUDE ALL HMOs WITHIN THE CITY. PLEASE INDICATE HOW STRONGLY YOU AGREE OR DISAGREE WITH THIS PROPOSAL?

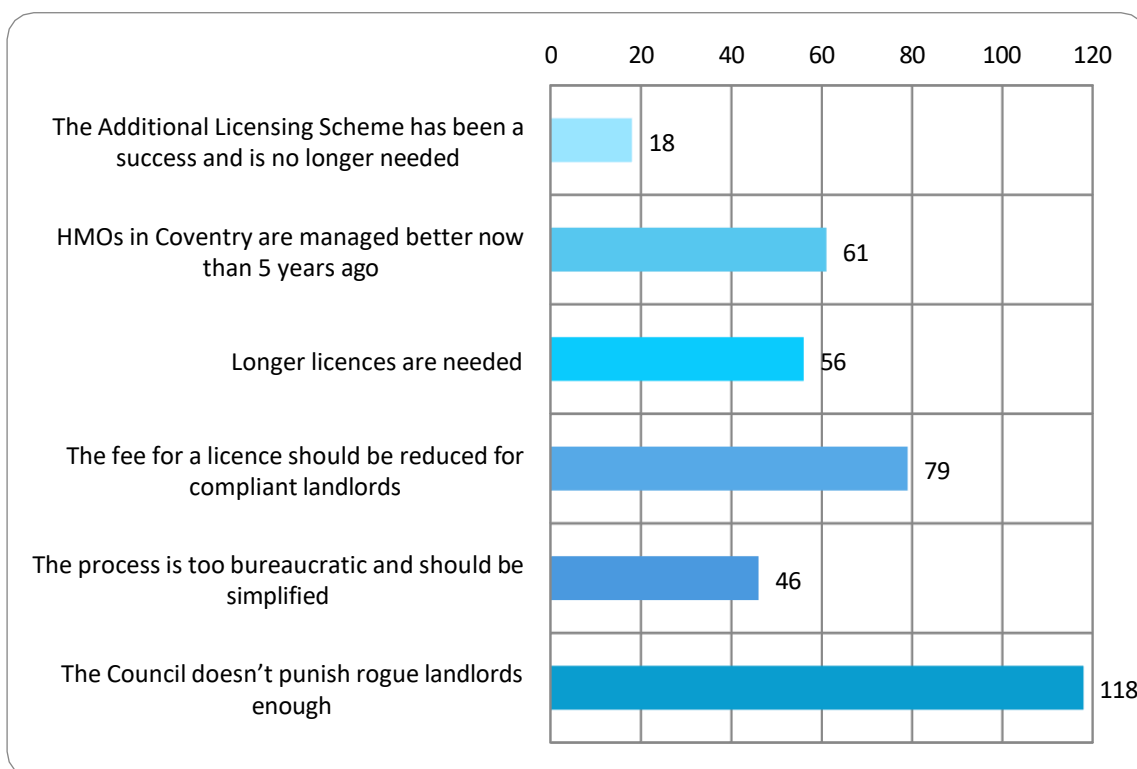


	No	%
Strongly agree	83	43%
Agree	36	18%
Neither agree/nor disagree	21	11%
Disagree	14	7%
Strongly disagree	41	21%

The majority of respondents strongly agree with the proposal to renew the additional licensing scheme at 43%, the total of those in agreement is 61%.

30% of respondents disagreed with the proposal to renew, with 1 in 5 strongly disagreeing.

WHICH OF THE FOLLOWING STATEMENTS APPLY TO COVENTRY. PLEASE CHOOSE ALL THAT APPLY.



The majority of respondents feel that the Council does not punish rogue landlords enough, 118 responses. This is followed by 79 responses thinking that the fee for a licence should be reduced for compliant landlords.

Encouragingly, 61 responses think that HMOs in Coventry are better managed now than 5 years ago.

The statement that received the fewest agreement was that the additional licensing scheme has been a success and is no longer needed with 18 responses.

FINALLY, DO YOU HAVE ANY COMMENTS YOU WOULD LIKE TO MAKE ON THE ADDITIONAL LICENSING SCHEME?

All the open-ended comments have been themed manually. The table below shows the themes and the number of comments received per theme.

Theme	No
Licensing improves situation/needs continual review	40
Council does not support landlords/ too bureaucratic	29
Too many HMOs	29
License does not improve situation	28
Poorly maintained HMOS	25
Negative impact on community	18
Unfair on good landlords	14
Landlords need to be accountable	7

A full list of comments can be requested by emailing insight@coventry.gov.uk

A large number of comments related to the positive aspects of the licensing scheme.

- It is a fantastic scheme aimed at driving up standards in HMO's which improves the living conditions for tenants, reduces ASB and helps to weed out poor/rogue landlords.*
- As a landlord that provides a great standard, I think the scheme is great. It helps guide me and know what I need to do to maintain a good standard and ensure the tenants remain safe, and have a good standard of accommodation.*
- Living in Earlsdon with an HMO next door and having suffered through a year of hell a couple of years ago, I fully support this scheme.*
- The licensing scheme is an important feature to our city regarding the control of HMO's without this in force there is possibility for future issues to arise.*

However, a number of respondents whilst recognising the value also stressed the importance of not making it too bureaucratic and ensuring it is enforced.

- We have a moral and ethical responsibility to ensure safe and affordable housing is available to Coventry residents. Additional Licensing is a great step in that direction. However, this has to be carefully balanced with not overburdening landlords and becoming too bureaucratic in its processes, otherwise it could push landlords to sell up, or let out HMO's illegally. Either of these unintended consequences would obviously not help the housing landscape and could have the opposite effect that additional licensing has been designed for.*
- Strong enforcement is critical to success as standards quickly fall if frequent and robust checks are not carried out.*

- *Licenses are good but enforcement is inadequate.*

There was a widespread feeling that the Council has made the scheme too bureaucratic and that it does not have capacity to deliver the checks needed.

- *HMO process is far too complicated. The HMO system has forced many many properties from the HMO market, because of the complication and unnecessary bureaucracy, and excessive costs.*
- *It took a year for the council to come out and inspect my properties. They then requested unnecessary changes. The council then did not bother to reinspect the property after changes were made. It is just another money making scheme from the council.*
- *The council has taken more than what they can handle. They have just gone to create extra income and that is the only reason for licence.*
- *Coventry City Council do not have the human resources to successfully carry out the additional work that comes with this scheme.*

There was general consensus that there are too many HMOs in Coventry and that we need to focus on family homes rather than housing students.

- *There are too many HMOs in Coventry and they do not provide good quality space for people or families. We require proper homes for people in the city and HMOs do not provide this.*
- *Stop the terrible spread of these HMO's which are removing valuable housing stock from the market for council tax payers (students do not pay any council tax and make up the vast majority of HMO occupancy)*
- *I do not know much about the licencing but would be interested to know. Have the council stopped any more HMO in Coventry now? as we have far too many.*
- *Please do something to prevent areas like cannon park estate turning into a complete student hmo area. These are lovely houses which would be lovely rentals or purchase by families. All sense of community has gone and we are left with tatty hmos. And a constantly changing population, settled families here are moving out of Coventry*

Some comments referred to the fact that the additional license scheme does not solve any of the problems it sets out to address in regard to bad landlords and that it is not being enforced.

- *The additional licensing scheme has not been a success but is no longer needed. There is little public faith in the scheme as any other than a money making scheme for the council. It has reduced PRS numbers, increasing rents, and frankly does the opposite of what it purports to do. Coventry should take example form other local authorities as how to how to successfully manage a licensing scheme without driving out non-rogue landlords.*
- *The scheme has succeeded in getting landlords like us (who won Warwick University's landlord of the year) to move away from HMOs because of the onerous and impractical conditions with no apparent benefit in terms of improving the behaviour of poor landlords.*
- *There needs to be a higher level of checking to ensure compliance with the regulations and stronger, more immediate sanctions for landlords who don't comply keep the property in good condition, who don't ensure the good behaviour of their tenants and who allow illegal or antisocial behaviour in their property.*

- *There is no value to a landlord for participating in the scheme.*
- *The council doesn't demonstrate that its taking action against non compliant landlords. we were told that the high fees to gain a license was to fund implementation and get bad landlords out of the market!!! I've not seen any evidence that has happened.*

Following on from the previous theme, a large number of respondents felt that many HMOs are badly maintained and that they have a negative impact on the local community

- *HMO's near me are filthy and poorly maintained. Rubbish everywhere and the houses look tatty. They bring down the neighbourhood. Landlords make a fortune but should be made to maintain their properties. It's horrible to walk around here now.*
- *Too often, Landlords do not live in the area, and are often indifferent to maintaining their properties to acceptable standards that are needed to maintain the quality of the neighbourhood. In addition to poorly kept lawns and gardens, fences, garage fascias, guttering are evident in deteriorating or poor condition.*
- *In all areas where HMOS are in coventry have become hell holes. Hmos are a blight on the areas. Once family homes and communities are now pit stops for for people of no long term concern for this city. The areas are blighted by fly tipping, you literally wade through rubbish walking the streets The communities have been destroyed. The older people in the communities feel lost and helpless in an unfamiliar land.*
- *HMOs are a blight in Coventry and no longer needed - they have ruined communities and most do not meet regulations and only increase anti social behaviour, littering and other issues, ran by greedy landlords many operating outside of Coventry, bringing no revenue onto the city and costing the council loss of money ie council tax and costs for differing services and impact on Infrastructure.*

A number of responses stated that the Additional Licensing Scheme is unfair on good landlords and that bad landlords are going under the radar and not being picked up by this scheme.

- *Since selective licensing was introduced, nothing has really changed to warrant continuing without significant change. Currently Agents and owners are viewed as cash cows, and not as partners in improving standards of HMO property in Coventry. There is a better way.*
- *Compliant landlords generally stay on the side of Licensing compliance and keep their properties in good condition for the tenants. Compliant landlords are easy targets for additional costs/ fees ..rogue landlords fly under the radar . Scrap the additional licenses or reduce costs and make simpler for compliant landlords.*
- *With all the new blocks in the city there is now way to much HMO accommodation and many good landlords with high quality properties but no tenants are being forced to sell up having spent thousands of pounds meeting HMO license requirements. So bad landlords get away with ignoring the new rules good landlords are leaving the market ?? has it worked well I don't think so.*

The final theme from the open-ended comments focused on needing to make things the landlord's responsibility.

- *Landlords need to be held accountable for the state of their properties.*
- *Unfortunately, there remain landlords who rent out properties without a license.*

EQUALITY QUESTIONS

AGE

	Number	%
16-24	4	2%
25-34	15	8%
35-44	37	19%
45-54	44	23%
55-64	54	28%
65-74	30	15%
75-84	9	5%

SEX

	Number	%
Male	85	46%
Female	92	49%
In another way	2	1%
Prefer not to say	7	4%

RELIGION

	Number	%
Buddhist	1	
Christian	87	47%
Hindu	2	1%
Muslim	2	1%
Sikh	8	4%
No Religion	49	27%
Atheist	15	8%
Prefer not to say	20	11%
Other	7	4%

HOW WOULD YOU DESCRIBE YOUR ETHNIC BACKGROUND.

	Number	%
White British	138	81%

White Irish	9	5%
Other White Background	7	4%
Mixed White and Black Caribbean	1	
Mixed White and Black African	1	
Mixed White and Asian	1	
Other Mixed or Multiple Ethnic Background	2	1%
Asian or Asian British Indian	10	6%
Asian or Asian British Bangladeshi	2	1%
Asian or Asian British Chinese	2	1%
Black or Black British Caribbean	1	
Other	1	
Prefer not to say	16	9%

DO YOU CONSIDER YOURSELF TO BE A DISABLED PERSON?

	Number	%
Yes	18	10%
No	168	90%

Additional comments



Additional Licensing Designation comment

Council documents state that Additional Licensing is required to operate a house in multiple occupation that is shared by three to four tenants living in two or more households.

The view of CPCA is that every opportunity should be available to register and monitor HMOs, so the Coventry City Council is aware of all HMOs, including those defined above, via a licensing process.

The main reason for this and using the Cannon Park/Cannon Hill Road area as an example, is that a significant proportion of HMOs are not maintained to a standard compatible with the neighbourhood.

Maintenance issues with HMO properties, including facias, gutters, and fences are an ongoing issue in the area. Gardens are frequently not well maintained, and weeding is seldom, if ever, done. This leads to ongoing weed invasion in driveways and pavement verges, which causes deterioration of these areas. In addition, gardens, usually grass along with weeds, are mowed infrequently. All these factors result in parts of the Estate and local streets looking "run down", which is unacceptable to home owner-occupier residents.

There are also significant issues at the beginning of the University academic year with the management of refuse and the correct use of the three colour-coded refuse bins, a problem which continues throughout the year. Incorrect refuse management results in refuse being placed in the incorrect bin for example, bagged kitchen waste being placed in both the "blue top" recycled refuse bin and "brown top" compost bin. Consequently, these bins are not emptied on the designated collection day resulting in overfilled bins and fly tipping of uncollected refuse on pavements, driveways, and gardens. In addition to creating a poor impression in the neighbourhood, vermin and scavenging birds, including gulls, then become an issue.

All of this highlights the need for mandatory and effective licensing, including Additional Licensing, with regular and rigorous ongoing surveillance of licensed properties by Council officers so that landlords can be held accountable. Where non-compliance with license conditions is identified, ameliorative measures must be taken within the conditions of the licensing scheme. Only in this way can further deterioration of a neighbourhood be curtailed. It must be noted that in areas where HMOs predominate, local residents cannot be expected to police the standard of HMOs and their compliance with license conditions.

Dave Swanson
Chairman

Keith Struthers
Secretary

Mr A Chowns
Via email

19 September 2023

Coventry City Council Additional Licensing scheme consultation

Dear Adrian,

I write to support an Additional Licensing scheme in Coventry, building on the success so far. High quality housing is fundamental to the success of the city and our wider region, to make it a great place for people who study, live and work here. Many rely on the private rental sector to meet their needs.

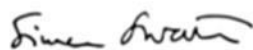
For the University, this plays an important part in our students' experience with us. When they graduate, we are glad that some choose to apply their knowledge and experience with local employers and make their homes in the area – enabled by good places to live. And as neighbourhoods change over time, it is important the strengths of those communities are supported and the negative impacts on them are managed.

We welcome the Additional Licensing scheme's contribution to supporting these residents. Additional Licensing ensures Houses of Multiple Occupation (HMOs) are managed properly, with basic standards of safety and provision. Without it, hundreds more properties would not have achieved these minimum standards nor engagement with the Council to ensure property managers are 'fit and proper'. We are glad that this work is improving the private rental sector. Furthermore, we have observed a reduction in neighbour complaints about students involving noise, rubbish, housing disrepair and other anti-social behaviour over the period of the current scheme.

Successful Additional Licensing schemes are supported by other strategic interventions to improve the quality of local housing stock, such as the Coventry Landlord Accreditation Scheme. The University will continue to make such positive interventions. By way of example, we have supported Warwick Students' Union to launch the Rate Your Landlord platform – empowering students to review their accommodation and make informed decisions when choosing a new home to reward the best landlords. This includes an annual celebration event for best practice among landlords.

We look forward to ongoing and further work together to improve the quality of local housing.

Yours sincerely,



Professor Simon Swain, Vice-President Engagement, University of Warwick

Appendix 2

Options Appraisal Document

The Additional Licensing scheme in the city, which commenced on the 4th May 2020 runs for a period of 5 years and therefore ceases on the 4th May 2025. This creates a situation where the future options for the scheme beyond the expiration need to be considered.

Under section 60(2) of the Act the expiry time must be no later than five years after the date on which the designation comes into force.

Under s.60 (3) of the Housing Act 2004 '*a local housing authority must from time to time review the operation of any designation made by them*'

To fulfil this requirement a review, which included a consultation exercise was undertaken between July and October 2023. The review showed that the licensing scheme has made good progress in improving standards in a large number of HMOs. However, there are still a significant number of properties that remain unlicensed and ineffectively managed.

As part of the review a number of options have been considered in relation to the HMO licensing scheme, these options were to renew the scheme in its entirety, renew the scheme in parts of the city or not renew the scheme. The best option from the appraisal was to renew the scheme in its entirety.

The main reasons for supporting the option of renewal of the scheme in its entirety are as follows:

HMOs are a major concern in Coventry. It is estimated that Coventry has the 14th highest number of HMOs in England and Wales. Only the large metropolitan and unitary authorities and some London Boroughs contain more. They form a high percentage of houses in the city which is attributed to high numbers of students attending both Coventry and Warwick University.

High house prices create a situation that puts the home ownership market beyond a large number of residents and places a burden on the private rented sector. Sharing accommodation is the only viable option for a large proportion of young and low-income households. Licensing ensures that the Council has a comprehensive toolkit to deal with poor conditions and issues around anti-social behaviour in all HMOs, thereby improving the living conditions for those residents in occupation and those who are affected by HMOs in the neighbourhood.

Planning policy has been developed by the Council to create 'mixed and balanced communities', which looks to limit the levels of HMOs in the sector so that there is a spread of sustainable and viable options for accommodation but despite all this the Council still have massive numbers of HMOs in the PRS.

The problems associated with living in a HMO have been well documented over the years and are known to professionals working in the sector. The recent review of the current Additional HMO Licensing scheme also indicates that a significant proportion of HMOs in the Council's area are still being managed ineffectively, with over 75,000

conditions being added to licences requiring the licence holder to carry out works to bring properties up to the appropriate standard and to manage them effectively.

The current spread of HMOs is not concentrated in one particular area and the issues regarding this type of accommodation are widespread. Partial licensing of HMOs would likely result in an increase of HMOs in areas which were not subject to licensing or covered by the Council's Article 4 direction and leave the Council with limited options for regulating these properties.

In order for the Council to 'renew' the scheme it must proceed through the statutory process as laid out in Section 56 and 57 and the guidance issued under the Housing Act 2004: Licensing of Houses in Multiple Occupation and selective licensing of Other Residential Accommodation (England) General Approval 2010.

Section 56 of the Act places requirements upon the local housing authority when considering a designation for additional licensing of HMOs, in that the Council must:

- Consider that a significant proportion of the HMOs of that description in the area are being managed sufficiently ineffectively as to give rise, or likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public; and
- Take reasonable steps to consult with persons who are likely to be affected and consider any representations made in accordance with the consultation and not withdrawn; and
- Have regard to any information regarding the extent to which any codes of practice approved under section 233 have been complied with by persons managing HMOs in the area (these codes relate to University managed accommodation).

Section 57 provides further considerations for the local authority in that they should ensure that:

- Exercising the designation is consistent with the authority's overall housing strategy;
- Seek to adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti-social behavior affecting the private rented sector as regards combining licensing with other action taken by them or others;
- Consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of dealing with the problem or problems in question; and
- That making the designation will significantly assist them to deal with the problem or problems (whether or not they take any other course of action as well).

The Department for Communities and Local Government (DCLG) General Approval provides the condition that any consultation period for the proposed designation should not be less than 10 weeks.

In February 2010 the DCLG produced general guidance around the approval steps for additional and selective licensing designations in England.

The Additional Licensing review indicated that properties are still being managed “*sufficiently ineffectively*” including:

- Those whose external condition and curtilage (including yards and gardens) adversely impact upon the general character and amenity of the area in which they are located;
- Those whose internal condition, such as poor amenities, overcrowding etc. adversely impact upon the health, safety and welfare of the occupiers and the landlords of these properties are failing to take appropriate steps to address the issues;
- Those where there is a significant and persistent problem of anti-social behavior affecting other residents and/or the local community and the landlords of the HMOs are not taking reasonable and lawful steps to eliminate or reduce the problems; and
- Those where the lack of management or poor management skills or practices are otherwise adversely impacting upon the welfare, health and safety of residents and/or impacting upon the wider community.

Option Appraisal

The option appraisal process carried out for the review of the scheme followed a series of logical steps, which when taken together, provided a thorough and systematic appraisal method to allow effective comparison of alternative options.

Although this process appears as a sequence of small steps following a linear pattern, in practice it is best viewed as a series of small cycles. The main steps followed are summarised below: -

Decide on the aim of the scheme, i.e. the desired outcome and the objectives necessary to achieve this:

- Data gathering and analysis of findings;
- Generate a range of basic options;
- Appraise the options against criteria; and
- Select a preferred option and carry out statutory consultation about the selected option.

The Option Appraisal process was managed by an internal steering group comprising senior staff from across the Council.

Deciding the aim of the Scheme

The overall purpose of the licensing scheme is to maintain minimum standards across the city in the most vulnerable sector of Coventry's private rental market by providing safer and healthier rented accommodation that is well managed with reduced overcrowding.

This is also a major contributing factor to the Council's Housing & Homelessness Strategy 2019-2024 which affirms the Council's view that housing is fundamental to the wellbeing of people, their families and their communities. Decent housing provides a stable base on which people can build their lives and build successful communities. Poor or unsuitable housing, however, can have negative impacts on many other areas of personal and community life as well as physical and mental health and wellbeing. If you do not have decent housing, everything else becomes much more difficult. Improving housing options, conditions and neighbourhoods within the city via delivery of this strategy is essential for economic growth, improving outcomes for children including their educational attainment, health and wellbeing, and community cohesion.

The main aim for the review and future of the scheme was therefore set around the purpose of the scheme and the Council's corporate priority of improving the use of existing homes. It was acknowledged by the officer steering group that the fundamental approach must be to enshrine the need to improve conditions and management of HMOs whilst maintaining minimum standards.

Objectives

Objectives that would have to be realised to achieve this aim were therefore defined and included the need to:

- Maintain minimum standards of HMOs in the city;
- Raise the standard of HMOs in the city
- Improve management of HMOs in the city;
- Reduce the impact HMOs have on the surrounding area;
- Contribute to the creation of a viable and sustainable housing market;
- Promote long term confidence in the city;
- Support the existing community, in particular young and low income households; and
- Promote an improvement of conditions in the Private Rented Sector in the city.

Option Generation

Following a detailed assessment of the data, which is provided in the review report, the next stage was to consider the generation of options which would seek to meet the stated aims and objectives and would deliver positive and lasting change.

The officer steering group developed and confirmed a range of options that could be applied to the City, each of them involving different levels of intervention and accordingly producing a different range of outcomes. These options ranged across the spectrum from statutory action only to complete renewal of the scheme. The officer steering group recognised that to be effective the review should consider all possible options.

The following options were considered:

Option 1 – Statutory action only. This is essentially the ‘base line’ position against which other options can be measured. It assumes that HMOs across the city will receive only minimum attention other than the action the Council is required by law to take to deal with poor conditions. i.e. mandatory licensing etc. Action would be by way of legal notices and orders. At some stage prosecutions would also have to take place. It is likely that this would do little to address environmental and management issues and this would most likely lead to a continuing spiral of decline with a growing need for intervention in future years. The aim and stated objectives would not be achieved.

Option 2 – Renewal of the scheme in certain areas of the city. This option assumes that the existing scheme is ‘renewed’ as necessary but only in certain areas of the city. The process of determination of these areas would be required but in essence this would create a situation where not all HMOs across the city are regulated consistently. In some parts of the city there are less HMOs but non compliance is found in all areas. Intervention to deal with these excluded areas would therefore be reduced if they were excluded from the scheme and this could result in an increase of HMOs in the excluded parts of the city and therefore less power available to the Council to deal with concerns and issues. This approach does not address the need for a comprehensive scheme and as an option it does little to meet the wider aspirations of the residents of the area or the aims and objectives of the scheme.

Option 3 – Renewal of the scheme in its entirety. This option assumes that the existing scheme will be ‘renewed’ in its entirety. The underlying basis of the option is that the Council will actively promote the Additional Licensing scheme and continue to implement the scheme under current conditions. Further reviews of the fees and charges structure would take place and options for extended licence periods would also be considered. i.e. 5 year licences for ‘gold’ standard landlords. This option would provide a level playing field for all HMOs and would ensure that the aims and objectives of the scheme were met.

Option Appraisal

A series of decision rules, against which each of the options were to be appraised, were also set. Typically the final preferred option for the future of the scheme must:

- Be technically feasible
- Be in accordance with relevant statutory powers

- Contribute toward strategic objectives
- Be appropriate to the needs of the community
- Be financially deliverable

Each of these options were assessed against the decision rules and the objectives set (based on scoring on un-weighted and weighted criteria).

It is important that assessments are made of the options for the contribution they make in meeting the objectives for the Scheme and addressing the decision rules set. The decision rules included a financial element but it is vital that any decisions affecting the area are not based on cost alone. The final option would then be open to statutory consultation.

Officers agreed the decision rules, assessments and scoring criteria. The steering group set out the weightings and carried out the assessments against the criteria. The results of each assessment can be found below.

Table 1 - Assessment of Options Against Decision Rules

Decision Rule		Options		
		1	2	3
1	Be technically feasible	3	3	3
2	Be in accordance with relevant statutory powers	3	3	3
3	Contribute towards the strategic objectives	0	1	3
4	Be appropriate to the needs of the community	1	2	2
5	Financially deliverable	1	3	3
Best fit against decision rules		8	12	14

Scoring (How option conforms to the decision rules)
0 = Breaks Rule
1 = Meets rule in some respects
2 = Meets rule in most respects
3 = Meets rule in all respects

The results of the decision rule assessment show that Option 2 and 3 are more favourable than Option 1. Option 1 is technically feasible and could be implemented in accordance with the relevant statutory powers but it does very little to contribute toward any of the other decision rules and would make very little contribution to the aims and objectives of the Scheme.

Option 2 scored slightly lower than Option 3 (12 compared to 14) because it was felt by the steering group that by licensing certain parts of the city the non-licensed parts would suffer with an increase in HMOs and this would impact on those neighbourhoods a lot more than if the whole area was subject to licensing. The Council would also have very limited powers to deal with any issues in HMOs which were outside of the licensing scheme and so this would impact on the local community and would do very little to create a sustainable and viable housing market.

Option 3 meets all of the rules in all respects with the exception of 'appropriate to the needs of the community'. This rule scored slightly lower because it was felt by the steering group that a number of landlords who were part of the community may not agree that a scheme of licensing was appropriate to their needs.

Overall Option 3 (*Renew the scheme in its entirety*) scores higher than any other option and meets all the rules in most respects and is the preferred course of action for the future of the Scheme.

An assessment against the objectives set for the review of the scheme was carried out to determine which option made the most contribution toward the objectives. The results of this can be seen in the table below.

Table 2 - Assessment Against Objectives (Unweighted)

No.	Objective Criteria	1	2	3
1	Maintain minimum standards in HMOs in the city	4	4	4
2	Raise the standard of HMOs in the city	2	3	5
3	Improve management of HMOs in the city	1	3	4
4	Reduce the impact HMOs have on the surrounding area	1	2	5
5	Contribute to the creation of a viable and sustainable housing market	0	3	4
6	Promote long term confidence in the city	0	3	4
7	Support existing communities, in particular young and low income households	1	4	4
8	Promote an improvement of conditions in the PRS in the city	2	3	4

Totals		11	25	34
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The scores were recorded according to the following criteria:

<i>Scoring (Contribution objective makes in meeting the vision)</i>
0 = no contribution
1 = very little contribution
2 = limited contribution
3 = reasonable contribution
4 = significant contribution
5 = very significant contribution

The un-weighted assessment shows that Option 1 would have little or no effect in meeting the objectives of the scheme. Options 2 and 3 make more significant impact and would be the preferable over Option 1.

Option 2 scores significantly well against a number of the objectives but because of the piecemeal approach it promotes and the inability for the Council to deal with HMOs outside of the areas of the city that would be subject to licensing overall it scores less than Option 3. Option 3 is considered to be the better option for dealing with the whole range of objectives because it means that the Council is able to have a widespread and consistent impact in all areas across the whole range of objectives.

In order to test these options further a weighted assessment using the weighting factors agreed by officers was carried out. The weighting was selected to reflect the contribution each of the objectives makes to the overall aim of the Scheme. This provides a balanced assessment of all elements of the option appraisal. The results of this weighted assessment are shown in the table below.

The weighting was chosen to reflect the contribution each of the objectives makes to the aim of the scheme, which is to *'alleviate the housing situation by setting and maintaining minimum standards across the city in the most vulnerable sector of Coventry's private rental market'* using the following criteria:

Weighting

1 = Meets aim to some degree
2 = Meets aim to a large degree
3 = Meets aim to a greater degree or in full

Table 3 - Assessment Against Objectives (Weighted)

N o	Objective Criteria	Weighting Factor	1	2	3
1	Maintain minimum standards in all HMOs	3	12	12	12
2	Achieve an improvement in conditions in all HMOs	2	4	6	10
3	Improve management of all HMOs	3	3	9	12
4	Reduce the impact HMOs have on the surrounding area	2	2	4	10
5	Contribute to the creation of a viable and sustainable housing market	2	0	6	8
6	Promote long term confidence in the area	1	0	3	4
7	Support existing communities, in particular young and low income households	3	3	12	12
8	Promote an improvement of conditions in the PRS	1	2	3	4
	Totals		26	55	72

The results of the weighted assessment support the findings of the decision rule assessment and the un-weighted objective assessment which is that Option 3 is the preferred course of action and will provide the ‘best fit’ for achieving the aim and objectives of the scheme.

The local authority officers agreed the decision rules, assessments and scoring criteria. The steering group set out the weightings and carried out the assessments against the criteria. Each option was assessed on an individual basis. The assessment summaries are set out below.

Table 4 - Summary of Option Appraisal Assessments

Assessment Method		Option 1		Option 2		Option 3	
		<i>Ran k</i>	<i>Scor e</i>	<i>Ran k</i>	<i>Scor e</i>	<i>Ran k</i>	<i>Sco re</i>
1	Decision Rule Assessment	3rd	8	2nd	12	1st	14
2	Objectives Assessment (un-weighted)	3rd	11	2nd	25	1st	34
3	Objectives Assessment (weighted)	3rd	26	2nd	55	1st	72

The table demonstrates that the most effective option is Option 3, and the least effective is option 1. The advantage of option 3 over option 2 increases significantly when considering the aims and objectives together.

On balance it is considered that **Option 3 better demonstrates that it meets the range of appraisal criteria and should be adopted within the preferred strategy.** It ranks 1st in all of the assessments and will best meet the aim and objectives for HMOs in the City.

Implementation

The next stages for implementing the proposal of Option 3 must follow the legal process set out in the Housing Act 2004 and be in accordance with guidance produced by Government. The Council also has internal procedures that must be adhered to ensure that the implementation of Option 3 is fully considered.

The Council will therefore be providing a summary of this report to the Cabinet Member for Housing and Communities in February 2024 setting out the key findings and recommendations for the renewal of the scheme.

The recommendations will include a proposal to commence a new designation in May 2025 for a period of 5 years. This would align with the end of the current scheme.

If approved the Council will proceed with the statutory consultation for a new designation for a period of 12 weeks and submit a future report to Cabinet Member for Housing and Communities setting out the results of the consultation and the structure of the new designation.

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Appendix 3

Additional HMO Licensing Proposals

Engagement and Consultation Plan



Contents

- 1. Introduction**
- 2. What can be influenced by the public / what is fixed?**
- 3. Engagement and consultation plan**
- 4. Activity plan**
- 5. Contact information**

1. Introduction

1.1 What is the purpose of this engagement?

Coventry City Council wishes to consult and seek the views of tenants, landlords, residents, and all other stakeholders in relation to a proposed new additional licensing scheme for Houses in Multiple Occupation (HMOs).

HMOs form a vital part of the Private Rented Sector (PRS) in Coventry, often providing cheaper accommodation for people whose housing options are limited. Some HMOs are occupied by the most vulnerable people in our society. Most HMO accommodation in Coventry was not built for multiple occupation, and therefore the risk of overcrowding and fire can be greater than with other types of accommodation. The nature of HMOs means that the regulation of this part of the sector is widely agreed to be necessary. Local Councils can introduce additional HMO licensing to improve the management and standards of HMO in their area. Coventry City Council has had a city wide Additional Licensing Scheme for HMO accommodation since 2020. This has meant that any person letting an HMO in Coventry, must have a licence. The proposed new scheme will replace the current additional HMO licensing scheme. It is proposed that the new scheme will continue to cover the whole of the city and will last five years. If, after the consultation, a new HMO licensing scheme is still found to be the best option, this recommendation will need to be approved by the Council's cabinet. If approved, we anticipate that the new scheme will commence in May 2025 when the current scheme expires.

1.2 What do we want to achieve?

The overarching aim of this activity is to support the successful delivery of the statutory consultation required within the Housing Act 2004, which in turn will enable the City Council to make a decision about the introduction of additional licencing for HMOs in Coventry.

The aims of the activity are:

- To inform those likely to be affected by the decision to introduce additional licensing for HMOs.
- To capture any representations made by those impacted by the decision to introduce additional licensing for HMOs.

1.3 How do we plan to achieve our objectives?

The Council proposes to carry out a 12-week consultation to obtain feedback and views on issues connected to the PRS and the proposals for discretionary licensing. Following this wide reaching, full consultation the Council will analyse all responses to the consultation and develop a final consultation results report and demonstrate how it has responded to the suggestions received. The results of the consultation will help to inform the final proposals for discretionary licensing. These final proposals will be published and formally agreed by the Council.

2. What can be influenced by the public and what is fixed?

Fixed:

- The continuance of a Mandatory Licensing Scheme
Mandatory licence conditions for additional schemes

Can be influenced by the public:

- Whether we bring in a new Additional Licensing Scheme

- Where we bring in a new Additional Licensing Scheme
- The fees and discounts applicable to the proposed scheme
- The discretionary licence conditions for the proposed scheme

3. Engagement and Consultation Plan

3.1 Who are we engaging with?

The following is a list of examples of the stakeholders that the Council will consult with and is not limited.

General target group	Examples of Individuals/organisations
Landlords	<ul style="list-style-type: none"> • Landlords operating and/or living in Coventry • Housing Associations/ Registered Social Landlords
Landlord groups	<ul style="list-style-type: none"> • National Residential Landlords association • Coventry Landlord Accreditation Scheme • Guild of Residential Landlords • BLA (British Landlords Association)
Managing and letting agents	<ul style="list-style-type: none"> • Managing and letting agents with local branches operating in Coventry
Residents	<ul style="list-style-type: none"> • Tenants who have privately rented within the last 5 years • Residents who have indirect experience of the private rented sector (i.e. neighbours of PRS properties) • Other organisations that represent tenants in the PRS • Coventry business owners • Coventry owner/occupiers
Organisations that represent tenants in the PRS	<ul style="list-style-type: none"> • Generation Rent • Acorn Union • The Tenants Voice • Belgrave Road & Neighborhood Watch Association • Cannon Park Residents Association • Bell Green Area Tenants and Residents Association • Chapelfields Area Residents and Traders Association (CARTA) • Charterhouse Resident's Association • Cheylesmore Good Neighbours • Clifford Bridge Community Association • Deedmore Residents Association • Gosford Park Residents Association

	<ul style="list-style-type: none"> • Manor Farm Residents Association • Paradise Community Action Group (PCAG) • Princess Street Residents' Association • Singer Residents Group • St. Catherine's Resident's Association • Stoke Aldermoor Resident's Association • Stoke Heath Resident's Association • Styvechale Grange Resident's Association • Tile Hill South Resident's Association • Tile Hill Village Residents Group • Upper Stoke Resident's Association • Websdale Tenant's and Resident's Association • Wood End Residents and Friends (WERAF) • Wood End, Henley Green and Manor Farm (WEHM) • Frontline Network
Professional bodies	<ul style="list-style-type: none"> • Chartered Institute of Housing • Chartered Institute of Environmental Health • RICS
Universities	<ul style="list-style-type: none"> • Coventry University • Warwick University • Arden University • Coventry Students' Union • Warwick Students' Union
Neighbouring local authorities	<ul style="list-style-type: none"> • Nuneaton and Bedworth Borough Council • Warwickshire County Council • Warwick District Council • Rugby Borough Council • Solihull Borough Council • North Warwickshire Borough Council
Charities	<ul style="list-style-type: none"> • CW Mind • Shelter • Crisis • The Tenants Voice • Citizens Advice • City YMCA • Cyrenians • Steps For Change • P3 • Salvation Army • Emmaus • Bardsley Youth Project • Valley House

Advice groups	<ul style="list-style-type: none"> • Citizens Advice Bureau • Generation Rent • Coventry Law Centre • Coventry Independent Advice Service • Age UK Coventry and Warwickshire • Macmillan Coventry and Warwickshire • Myton Hospices • Coventry Refugee and Migrant Centre
Health	<ul style="list-style-type: none"> • Coventry and Warwickshire Partnership NHS trust • Coventry University Hospital • GPs (websites) • NHS local clinical Commissioning groups • Social Services
Emergency Services	<ul style="list-style-type: none"> • Coventry Police • Coventry Fire Service
Other	<ul style="list-style-type: none"> • Coventry Foodbanks • Coventry and District Credit Union • Trading Standards • Suppliers of temporary accommodation • Coventry Schools • MPs, Local Cllrs • Mayor of West Midlands

3.2 When and how are we engaging?

The minimum consultation period for the Additional Licensing proposals required by the MHCLG is 10 weeks. In order to reach as many consultees as possible, it has been decided that this consultation will be extended to 12 weeks, commencing 26th February 2024 concluding 17th May 2024. The extended consultation timeline has been given to ensure engagement with a wide range of stakeholders. To support this and making use of the additional time, a number of different engagement activities have been planned for the licensing proposals.

Online consultation questionnaire

The primary way in which people will be able to provide their feedback on the scheme and give details of their experiences will be via a dedicated HMO Licensing Consultation page on the Council's online platform "Let's Talk" which will contain an online survey. This is to ensure as much as possible that the responses received are focused on the questions that we need answered and to facilitate the collation, comparison and tracking of responses.

The questionnaire will be relevant for all interested parties as it will ask targeted questions dependant on who you are i.e. whether you are a tenant, landlord or managing agent etc. The questionnaire will be hosted on a dedicated and easily accessible page on the Council's website that will provide the respondent with all the information necessary about the proposal to allow them to make an informed response. The on-line questionnaire will be accessible via all digital platforms – mobile, tablet, laptop/computer. Residents without digital access will be able to request a paper copy or can be supported to complete the questionnaire digitally at one of our engagement sessions or during an appointment with an officer.

Meetings/workshops/forums/engagement sessions

During the course of the consultation, we will be running a number of events to encourage engagement with stakeholders. We will be attending multiple Landlord Forums and Homeless Forums to inform them about the consultation and engage in Q & A sessions. Attendees will be invited to our consultation workshops and/or encouraged to fill out our online consultation questionnaire on the tablets we will have available at the sessions.

We will be holding a total of six workshops, three for landlords and agents and three for residents. These workshops will allow each group the opportunity for an in-depth interactive session to discuss their thoughts on our proposals and their experiences regarding the condition of the PRS in Coventry and its effect on deprivation, crime and anti-social behaviour.

In writing/email

Contact details will also be advertised as part of the consultation so that representations can also be made via e-mail or in writing. There will be a dedicated email address for responses.

The consultation will take note of any formal petitions and will also take note of any activity on social media, although this will not equate to a formal representation.

3.3 What are the questions we will ask?

The example questions used here are samples taken from our proposed online consultation questionnaire and should not be considered exhaustive. There will be an extensive pack with all of the background information to allow respondents to understand what they are being asked and give a considered response.

1. Whether the stakeholder has direct experience of anti-social behaviour, deprivation or poor housing conditions in the private rented sector.
2. To what extent do you agree or disagree that the current Additional Licensing Scheme has been effective in improving the quality and management of HMO properties in Coventry?
3. If the current Additional Licensing Scheme stopped and was NOT continued, what impact do you think this would have on your local area?
4. If they agree with the Council's proposal to introduce a renewed Additional Licensing Scheme.
5. To what extent do they agree or disagree with the principles of the scheme and the wards that we have proposed to include?
6. If they think the fees, discounts and structure is reasonable?
7. To what extent do you agree or disagree with the proposed Additional Licensing conditions?
8. If they are a landlord, whether they would be interested in signing up to the Coventry Landlords Accreditation Scheme (CLAS) and whether the proposed discount on licensing fees would be an incentive.
9. If they are a tenant in the PRS whether they would be more likely to move into a property with a landlord or managing agent who has signed up to the CLAS than one without.

10. A final open-ended question inviting respondents to raise any further points they wished to make in relation to the proposed licence fees, conditions, and anything else the Council should consider; and to provide further comments about any other aspect of the proposals.
11. There will be an optional set of questions asking people for information about their age, sexual orientation, ethnicity and age etc. This will help us ensure that we are gathering views from all communities.

3.4 How will we promote the engagement opportunity?

The Council will conduct necessary communications activity to promote the consultation and ensure that a true reflection of the views of the affected groups in relation to this consultation is achieved. The key to successful consultation is to ensure that stakeholders who could be affected are informed and aware of the proposals and understand how they can provide feedback. Communications will take place throughout the duration of the consultation and will include:

- Advertising on electronic media such as Coventry City Council website
- An eform linked to the main consultation webpage
- Advertising on social media such as Twitter, Instagram, Facebook
- Straplines linked to the main consultation page to be added to all officer email signatures
- Posters/Advertising on buses and bus shelters
- Direct emailing of landlords and managing/letting agents or properties licensed within the last 5 years
- Online engagement sessions with managing/letting agents
- Direct mail and email to local communities
- Press releases in local publications such as Coventry Telegraph , Coventry Observer, Earlsdon Echo
- Posters referring people to the consultation
- Flyers to be sent to addresses that are indicated by Council data as occupied by residents with a profile that matched those in the PRS
- Flyers to be included in correspondence to tenants and landlords.
- Flyers for students to be distributed at local higher education establishments
- Community meetings and events in Coventry, including Landlord Forum, street/area consultation events and focus groups for the representatives of some minority groups
- Online meetings with representatives of charities such as Shelter, Crisis, etc.
- Emails to a wide range of national, regional and local stakeholders
- A dedicated email address for responses
- PowerPoint presentations for events.
- Direct emailing of landlords who are members of the Landlord Forum
- Direct emailing to Landlord Forums or other professional landlord groups.
- Direct emailing of accreditation schemes.
- Direct emailing of Resident Associations.
- Officers interviewing tenants and landlords/managing agents whilst on inspections
- Direct contact with landlords and managing agents and bodies representing landlords and agents
- Invitation of various stakeholders to online workshops
- Presentations at online forums
- Advertised internally on staff intranet
- Direct email to the equivalent team in neighbouring local authorities

3.5 What is our plan for letting people know the outcome of the consultation?

Throughout the consultation process a record of each consultation event or period that has been undertaken and the feedback obtained will be formally logged. The record will detail the date of the

consultation, what form of consultation took place, who was consulted and what feedback was given. Once the consultation has concluded and all responses are in, all feedback will be analysed and summarised in the consultation report.

Coventry City Council are committed to ensuring all comments received are recorded and there is a clear audit trail of all decisions made and how consultation responses were taken into consideration and balanced with any evidence and specific information gathered. The consultation report will be published and placed on the website. The outcomes of the consultation and response to the consultation, plus any recommendations for the Additional Licensing Scheme will be made to the Council's Cabinet.

4. Activity plan

WHAT	WHO	PURPOSE	WHERE	WHEN
Ward drop-in sessions		Q&A sessions on the proposed Additional HMO Licensing Scheme	One in every Ward within the City	The sessions will begin on Tuesday 27 th February and will be held on Tuesdays and Thursdays in the different Wards thereafter.
Landlords Forum	80+	Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops.	Online	2024 February/March
Homeless Forum	40+	Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops.	Online	TBC
Landlords Workshop	10+	Discussion workshop to understand private sector landlords' opinions on the proposals with brief Q&A session.	Online	February/March/ April
Tenants Workshop	10+	Discussion workshop to understand private sector tenants' opinions on the proposals with brief Q&A session.	Online	February/March/ April
Attend Community Council Meetings		Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops.	Online	TBC
News Story for press	General public	Fly on wall bad landlord case study with lead into licensing consultation.	Coventry Telegraph, Coventry Observer, Local BBC News	First week of consultation
Adverts in press	General public	Advertise licensing consultation.	Coventry Telegraph, Coventry Observer	Week one of consultation and week 6 of consultation
Landlords Bulletin	300+	Advertise licensing consultation.	Mail list	February/March

Coventry Landlord accreditation scheme newsletter	All member of the CLAS	Advertise licensing consultation.	Members list	TBC
Strap lines on emails	General public	Advertise licensing consultation.	Housing enforcement and Environmental Health Officers (19 officers) Housing Options/tenancy relations teams	Duration of consultation
Social media campaign	General public	Advertise licensing consultation.	Facebook. Twitter, Instagram, Yammer	Once a week for the duration of consultation
Advertising on electronic media	General public	Advertise licensing consultation.	Coventry City Council website	Duration of consultation
Email/Mail shot to stakeholders	Mailing list	Advertise licensing consultation.	TBC, Homeless forum	March
Email invitations	Mailing list	Invite landlords, tenants and agents to our discussion workshops on our licensing proposals.	Email	February/March
Posters	General public	Advertise licensing consultation.	To be displayed in public places	Duration of consultation
Digital marketing boards	General public	Advertise licensing consultation.	Busy pedestrian areas (Friargate, Customer Service Centre)	Duration of consultation
Banners	General public	Advertise licensing consultation.	Railings outside public owned buildings and outdoor spaces e.g. parks	Duration of consultation
Flyers	General public	Advertise licensing consultation.	Posted in targeted areas	Duration of consultation
Information bulletin	General public	To advertise the consultation and offer the public the chance to approach us informally and ask questions they have regarding the scheme.	TBC	Multiple events throughout the consultation

5. Contact information

Stakeholders are able to contact officers if they would like to know more about the engagement plan or activities via the details below:

HMO licensing

Address: PO Box 15

Council House

Earl Street

Coventry

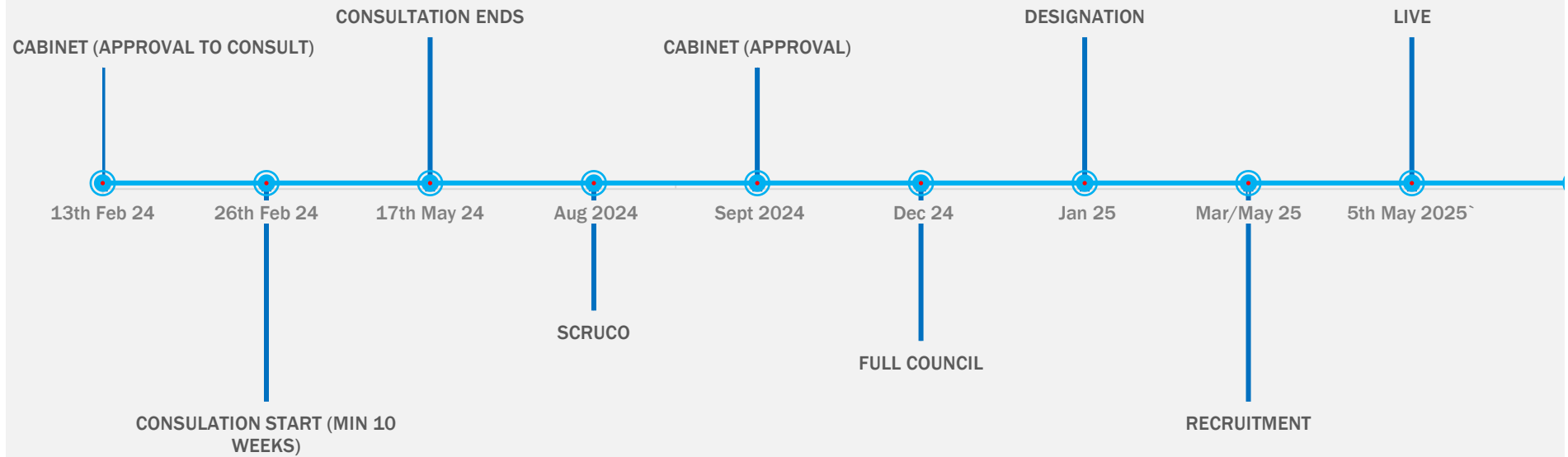
CV1 5RR

Telephone: 024 7697 5467

Email: hmo@coventry.gov.uk

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

Additional Licensing Scheme



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Appendix 5

Proposed HMO Licence structure

Coventry City Council propose to maintain the one, two and five year licence structure to reflect compliance with legislation and incentivise improvement in standards, management and professionalism among landlords.

To be eligible for a given length of licence, the landlord must meet all the criteria set out below at the point of application. In order for this assessment to be made the application will need to be valid at this stage.

One year licence

You will receive a one-year licence if you submit a valid HMO licence application.

There are no additional prerequisite criteria for receiving an annual licence. The proposed licence holder and the proposed manager must be a “fit and proper person” as defined by the [Housing Act 2004](#) and must have a registered UK address. The HMO must be suitable for occupation for the number of people you wish to accommodate. Although not a prerequisite for receiving a one-year licence, you still have a legal duty to comply with all relevant Acts and Regulations; including (but not restricted to) the Housing Act 2004, Planning and Building Regulations, and the Regulatory Reform (Fire Safety) Order 2005.

To receive an annual licence, you and the manager of the HMO must also be a “competent” person and there must be no concerns over the management of the house.

All first-time licensees will normally receive one-year licences unless they are able to provide evidence that they have other licensed properties in England or Wales. The Council will consider (but not guarantee to grant) applications for a two- or five-year licence if operating other licensed HMOs is the only eligibility criterion which is not met.

Two-year licence

To receive a two-year licence, you must submit a valid application and meet all of the following criteria:

- Good management at the property
- Good application history - all documents submitted on time
- No subsequent reminders for outstanding information, documents or payment needed after the initial contact regarding an invalid application
- No issues from other internal and external departments (e.g. Planning, Building Control, Police, HMRC, Immigration (BA))
- The property benefits from the correct [planning permission](#)
- Minor health and safety/disrepair/fire safety conditions on the licence
- Licence conditions completed on compliance inspection (renewals only)

- Have a maximum of two justified service requests (complaints about the property we have taken action to resolve)
- No missed appointments (when running late, Council is informed), no difficulty arranging appointments
- All rooms available to inspect
- Fire Risk Assessment in place

Five-year licence

To receive a five-year licence, you must submit a valid application and meet all of the following criteria, in addition to the two-year criteria described above:

- Good application history - all documents submitted on time
- No subsequent reminders for outstanding information, documents or payment needed after the initial contact regarding an invalid application
- Proposed Licence Holder and proposed Manager are accredited by the Council
- Proposed Licence holder to provide a DBS certificate if not accredited/not seeking accreditation with CLAS or ANUK and where the agent is accredited/member of ANUK and is acting as the manager with full management responsibility for the property. Request a check.
- Adhere to the principles set out in the Private Rented Sector Code of Practice
- Good management at the property
- Arrangements in place for regular maintenance/repairs i.e. British Gas Homecare or similar
- Arrangements in place for the cleaning, e.g. cleaning contracts
- Membership of other professional association – RICS, ARLA (agent only)
- No issues from other internal and external departments (e.g. Planning, Building Control, Police, HMRC, Immigration (BA))
- A management arrangement and terms of business in place. A copy of this agreement to be provided on request (applies only if a property is managed by an agent)
- No additional conditions added on compliance inspection (renewals only)
- No missed appointments or over 10 minutes late; landlord will co-operate with Council officers to arrange inspections and all rooms are available for the inspection

- No justified service requests (complaints to the Council by tenants or other parties about conditions in the house)
- Landlord or agent carry out inspections themselves at least every 6 months and at the beginning and end of the tenancy.
- Fire Risk Assessment in place
- Managing Agents (with sole or joint management responsibility) meet the following additional criteria:
 - Company employees are suitably qualified in property management
 - All employees carry out regular continued professional development
 - The company is registered with a recognised professional association

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Title of EIA		HMO licensing consultation
EIA Author	Name	Steven Chantler
	Position	Principal Environmental Health Officer
	Date of completion	15/11/23
Head of Service	Name	Davina Blackburn
	Position	Strategic Lead of Regulation
Cabinet Member	Name	David Welsh
	Portfolio	Cabinet Member for Housing and Communities

EIA	<ul style="list-style-type: none"> • Having identified an EIA is required, ensure that the EIA form is completed as early as possible. • Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities), Lisa Young (Health Inequalities), Emily Stewart (Health Inequalities), Laura Waller (Digital Inclusion).
Sign Off	<ul style="list-style-type: none"> • Brief the relevant Head of Service/Director/Elected Member for sign off • Have the EIA Form ready for consultation if it is required • Amend according to consultation feedback and brief decision makers of any changes
Action	<ul style="list-style-type: none"> • Implement project / changes or finalise policy/strategy/contract • Monitor equalities impact and mitigations as evidence of duty of care

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?

Coventry City Council implemented a city-wide HMO Additional Licensing scheme on 4 May 2020, which required all HMOs in the city to be licensed.

The Council has a duty to carry out a review of any discretionary licensing scheme it has implemented to determine if it is achieving the aim of improving management standards and property conditions for the tenants that live there. The scheme is now reaching its third year and as such this is an appropriate time to review it. The outcome of this review will help measure the effectiveness so far and will assist in informing a future decision on the renewal of any scheme designation.

The review is also intended to lead to service improvements within the remaining life of the existing scheme and for any future scheme and will provide a positive way of engaging with partners, both internal and external, landlords and tenants, and as such has the additional benefit of raising awareness of HMO licensing.

1.3 List organisations and people who are involved in this area of work?

Landlords
Agents
Tenants in the Private Rented Sector
Residents living in the city

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 an analysis of the equalities data your service holds. This could include surveys, complaints, compliments, management information and customer profiles. *(Please refer to Diversity Guide)*
- Where possible compare your data to local data using
 - Facts about Coventry
 - Census 2011
 - Census 2021
 - JSNA

Coventry's population size has increased by 8.9%, from around 317,000 in 2011 to 345,300 in 2021. 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%.

Affordability of home ownership has worsened in 2022, full-time employees could expect to spend around 8.3 times their annual earnings buying a home.

The Coventry Homefinder register for social housing has approximately 8,200 applicants at any one time and all of these households have a recognised housing need. Approx 1,500 of these are in Band 1 and have an urgent housing need as set out in the Homefinder policy however there are less than 1,000 social housing lettings per annum in Coventry across all Housing Associations working in the city.

The rate of social renting in Coventry remained at 17.0%, while the rate of home ownership decreased from 60.6% to 57.4%.

The Strategic Housing Market Assessment calculated a need for an additional 42,000 homes by 2031 to meet the growth needs of Coventry, including 12,000 additional affordable homes.

In Coventry, the percentage of private renting increased from 20.6% in 2011 to 24.7% in 2021 and the median monthly rent recorded in October 2023 was £641.60.

The English Indices of Deprivation 2019 were published by government department MHCLG on the 30th of September 2019. They rank all small areas in England according to different measures of deprivation and are the most widely used measure of deprivation. Seven domains of deprivation are combined to produce the overall Index of Multiple Deprivation. Each domain contains a number of component indicators including Income, Employment, Health and Disability, Education Skills and Training, Barriers to Housing and Other Services, Crime and Living Environment.



It puts the 326 Local Authority Districts into a rank order based on the population weighted average rank of all areas with a rank of 1 being the most deprived.

Overall, Coventry has improved notably between the IMD 2015 and the IMD 2019 relative to other local authority areas. This does not necessarily imply absolute improvement.

Depending on the way it is measured, Coventry ranks between 64th and 81st most deprived local authority area of 317 in England.

28 out of Coventry's 195 neighbourhoods (14%) are amongst the most deprived 10% in England, a reduction from 36 in the IMD 2015.

There was relative improvement across all domains apart from the living environment, the area in which Coventry fares least well relatively. This measures the quality of housing, air quality and road traffic accidents.

The Crime domain and the Barriers to housing and services are areas in which Coventry is in the best position relatively; these domains also showed the biggest relative improvement since the IMD 2015.

There was not a strong pattern of improvement in the IMD by deprivation decile, the areas that were more deprived in 2015 improved to a similar degree to those that were less deprived originally.

We are now half way through the scheme and have collected a lot of data in relation to property improvements that have been made to the properties in terms of repair and maintenance, which will be baselined from the scheme's inception. The review and consultation process will seek to speak stakeholders to gauge their satisfaction of the scheme and what impact it has made to their lives.

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 5.0 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	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) ²
Age 19-64	P	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. HMO licensing improves 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 up keep.
Age 65+	P	See above in terms of disposable household income and average house prices. The option of residing in an HMO applicable depending upon the individual / household circumstances.
Disability	ID	Property licensing is intended to raise the standards of condition and management by landlords of rented properties. Therefore, tenants with a disability should benefit from the licensing regime as there are minimum standards set for amenities and licence conditions relating to the property which landlords must comply with. There is no known impact on landlords who have a disability, except in as much as assistance is available by phone and email from council officers for those having difficulty using on line application and payment systems.
Gender reassignment	ID	There is no known impact on landlords or tenants who have gender reassignment, except that one of the benefits of licensing schemes is to reduce the incidence of harassment of tenants by landlords or attempts by landlords to unlawfully evict tenants.
Marriage and Civil Partnership	ID	No direct impact although the option of residing in an HMO will be applicable depending upon the individual / household circumstances.
Pregnancy and maternity	ID	No direct impact although the option of residing in an HMO will be applicable depending upon the individual / household circumstances.
Race (Including: colour, nationality, citizenship ethnic or national origins)	ID	No direct impact although Coventry has a diverse population and affordable housing will be applicable depending upon the individual / household circumstances.



Religion and belief	ID	No direct impact although the option of residing in an HMO will be applicable depending upon the individual / household circumstances
Sex	ID	No direct impact although the option of residing in an HMO will be applicable depending upon the individual / household circumstances
Sexual orientation	ID	No direct impact although the option of residing in an HMO will be applicable depending upon the individual / household circumstances

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

SECTION 3 – HEALTH INEQUALITIES - See the health inequalities pre EIA guidance sheet for this section.

3	Further information on health inequalities is available on the Intranet
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3.1 Please tell us how the proposal you are submitting this EIA form will reduce health inequalities:

Please include which Marmot Principles this work covers.

Coventry is a Marmot City. The Marmot approach of using 'Proportionate Universalism' shows how allocating resources across the social gradient, but proportionate to peoples need, can benefit everyone and help improve health equity. This also shifts resources from always being reactive to a more preventative way of working.

Benefits for you if you are a private tenant: Improved standards of property, security and decency, Increased safety in your own home through elimination of rogue landlords, and protection from illegal evictions, better information on your rights and expected standards in your home, better protection of vulnerable tenants

Improvements in partnerships between us and other agencies, such as the police and fire brigade. More effective tackling of issues, such as antisocial behaviour, crime and poor / dangerous housing conditions

The Marmot Review ["Fair Society, Healthy Lives", 2010] notes that 'The more deprived the neighbourhood, the more likely it is to have social and environmental characteristics presenting risks to health'.

Coventry's Headline Statistics

1. The population of Coventry is around 345,300.
2. The average (median) age of residents of Coventry is 35 years of age (compared with 40 nationally).
3. Life expectancy is 10.7 years higher for men and 8.3 years higher for women in the least deprived areas of Coventry than in the most deprived areas.



4. In the latest census, around 242,100 Coventry residents said they were born in England. This represented 70.1% of the local population.
5. 55.9% of Coventry's school children are from an ethnic minority group compared with 35.0% nationally.
6. Children living in poverty (financial year ending 2021) 22.9% compared with 18.5% nationally
7. In 2020 the percentage of households in fuel poverty in Coventry increased to 20.3% from 18.8% in 2019.
8. Depending on the way it is measured, Coventry ranks between 64th and 81st most deprived local authority area of 317 in England.
9. Coventry has an Income Deprivation Affecting Children Index (IDACI) score of 0.218 (2019). This measures the proportion of all children aged 0 to 15 living in income-deprived families. The average for West Midlands combined authority is 0.235.
10. Coventry has an Income Deprivation Affecting Older People Index (IDAOPI) score of 0.190 (2019). This measures the proportion of all those aged 60 or over who experience income deprivation. The average for West Midlands combined authority is 0.203.

There is significant body of evidence (Marmot Review) which demonstrates that there is a strong link between a residents health and poor housing, By raising the standard of housing it will have a positive impact on a residents health and wellbeing

Marmot principles		
1	Give every child the best start in life	<input checked="" type="checkbox"/>
2	Enable all children, young people, and adults to maximise their capabilities and have control over their lives	<input checked="" type="checkbox"/>
3	Ensure a healthy standard of living for all	<input checked="" type="checkbox"/>
4	Create fair employment and good work for all	<input type="checkbox"/>
5	Create and develop healthy and sustainable places and communities	<input checked="" type="checkbox"/>
6	Strengthen the role and impact of ill health prevention	<input checked="" type="checkbox"/>
7	Tackle racism, discrimination and their outcomes	<input type="checkbox"/>
8	Pursue environmental sustainability & health equity	<input checked="" type="checkbox"/>



3.2 What information do you have to show you are going to reduce health inequalities:

Think:

Coventry has an estimated population of approximately 345,300. Census 2021 data suggests that Coventry's population has a much younger age profile than England in general; it is the younger population that is on the increase with a decline in the over 75's. The average age of Coventry's residents is 33 years, notably lower than the England average of 40 years, and is falling. The student population means there is continually a large population aged 16-24, this age group makes up 13.7% of the population.

The growth and increase in the size of the Private Rented Sector (PRS) has been a significant change in the housing market in Coventry. In 2021 there were approximately 33,000 households living in the PRS. HMOs are a major concern for the Council with the Census 2021 suggesting that HMOs currently make up a quarter of the PRS.

The trend over many years has been for the HMO stock to grow steadily within the city. The Council has produced a Housing Strategy which recognises that, amongst other things, there is limited social affordable housing available in the city making it clear that the private rented sector will need to play a greater role in meeting housing needs in the city. Additional Licensing is part of a wider set of measures to enable landlords to provide good quality housing within their communities and will help alleviate the housing situation by setting and maintaining minimum standards across the city in the most vulnerable sector of Coventry's private rental market.

Support for people and communities - Some communities are experiencing the impact of an increasing proportion of housing that is converted to multiple occupation, especially (but not exclusively) for student housing. Where HMOs are well managed and maintained, they provide an important housing option. However, where there is poor management and poor standards, this can have a detrimental effect on the occupiers and adversely impact on the local community.

Improving the use of existing homes - It is important to increase the number of homes to meet the city's growth needs, but the majority of housing available in the city is already in existence. There are approximately 142,000 existing homes in the city, compared to 24,600 additional homes to be provided over the life of the Local Plan (to 2031). The condition of the existing housing stock is important to ensure that residents are living in decent, safe accommodation which is suited to their needs. Rented homes must be well managed by landlords who meet their responsibilities, and tenants should understand their rights and their own responsibilities too.

The Housing Strategy links into other key strategies, including, the One Coventry Plan, the Health and Wellbeing Strategy and the Climate Change Strategy by contributing to the delivery of the key corporate priorities.

Regulatory Services is responsible for regulating the housing sector and embraces a range of service areas used by people, businesses and organisations and through this work profile "seeks to



ensure that the public, visitors, workers and residents of Coventry have a healthy and safe work and domestic environment.” through education, persuasion and enforcement activities. The teams within the service are responsible for ensuring properties and landlords in the PRS meet minimum legal requirements.

The service has been working with landlords to improve conditions within the HMO stock of the city through the national mandatory HMO licensing scheme as well as statutory regulatory functions relating to maintaining minimum standards in properties in the sector.

A variety of interventions have been used in Coventry to tackle problems in the HMO stock in the city. With the introduction of the Additional Licensing Scheme the service was structured in such a way as to concentrate on HMO applications with a dedicated team of Property Licensing Assistants supporting our team of Environmental Health Officers who are responsible for inspecting the HMOs and investigating non-compliance. There is a very close working relationship between the two teams. The service provided by the HMO Team is supported by a dedicated Tenancy Relations Officer who works alongside them, providing advice and assistance to landlords and agents about their rights and responsibilities.

Where serious breaches occur legal action has been taken which has led to convictions and, in some cases Banning Orders. In many cases the Tenancy Relations Officer prevents homelessness through their involvement with proactive casework.

3.3 Who/which groups of people might face the biggest health inequalities for your work and why: What can be done to improve health equity for the groups of people you have identified?

People from different ethnic groups

HMOs are occupied by a diverse population, and such communities can be particularly affected by overcrowding, illegal accommodation, substandard conversions and poor management.

Potential benefit: Additional Licensing brings improved quality and safety of accommodation for tenants living in HMOs and assist in the identification and removal of landlords who cause negative impact to vulnerable groups or new communities via substandard or illegal accommodation. This would also be a benefit to all compliant landlords as it would ensure all landlords are operating within the legislative framework.

Children and Vulnerable Adults – the licensing scheme will have a positive benefit on the safeguarding of children and vulnerable adults as the fit and proper test will prevent persons managing or being a licence holder who has convictions for sexual offences, drugs, fraud etc.



Potential adverse impact:

Landlords

In regulating hazards in privately rented properties, owners and agents who are regulated against may feel that they have been adversely impacted upon. However there are no other ways in which the service could be provided that would achieve these aims without adverse impact. Ultimately, when working within the legislative framework, people have a right to legal redress should they feel that a decision was unfairly/unlawfully taken; this can be via an appeal process or the Council's Complaints system

Tenants

Concern has been raised that licensing could cause an increase in rents as a result of the increased landlord expenditure on the licence fee and the costs of complying with licensing conditions being passed onto the tenant. Overall, the additional cost of the licence fee to landlords is considered to be small as a proportion of rental income, especially across the term of the licence it should not equate to more than a few pounds per week for compliant landlords.

A comparison was conducted to assess the movement of rental values for single rooms and, in particular if licensing of HMOs has had a direct impact on increasing rental values in areas which had licensing schemes and those which did not have licensing schemes. The study found that the rents are not dissimilar to increases experienced in other areas in the region and England where additional licensing schemes are not in operation.

From looking at this information, who/which groups of people might face the biggest health inequalities for your work and why

Property licensing is intended to raise the standards of condition and management by landlords of rented properties. Therefore, everybody should benefit from the licensing regime as there are minimum standards set for amenities and licence conditions relating to the property which landlords must comply with.

3.4 What can be done to improve health equity for the groups of people you have identified?

To make advice and guidance available to landlords and tenants according to their needs, such as where English is not the first language. We ensure that when we take enforcement action it is in line with the Enforcement Policy, which means that action must be proportionate and reasonable.



SECTION 4 - DIGITAL EXCLUSION INEQUALITIES

Please consider the digital exclusion information in the supporting document prior to completing this section.

4.1 Starting point:

Thinking of the main aims of your work area that this EIA is for; does your work area impact digital inequalities or exacerbate? Y

- Assistance to be offered to all landlords to complete the application form and on-going help and advice will be given.

4.2 4.1 Reducing digital exclusion inequalities

Where are the opportunities for your area to reduce digital exclusion inequalities and embed supports/interventions as part of your work?

Again assistance to be offered to all landlords to complete the application form and on-going help and advice will be given.

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

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Age:

Female	
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Male	
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Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

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

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	

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

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6.1	Action Planning	
Issue Identified	Planned Action	Timeframe



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7.0 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 ☐

8.0 Approval

Signed: Head of Service: Davina Blackburn	Date: 16/11/2023
Name of Director: Julie Newman	Date sent to Director: 18/01/2024
Name of Lead Elected Member: 	Date sent to Councillor: 22/01/2024

Email completed EIA to equality@coventry.gov.uk

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Public report Cabinet

Cabinet

13th February 2024

Name of Cabinet Member:

Cabinet Member for Jobs, Regeneration and Climate Change - Councillor J O'Boyle

Director approving submission of the report:

Director of Business, Investment and Culture

Ward(s) affected:

All

Title:

Business Energy Advice Service (BEAS)

Is this a key decision?

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

Executive summary:

In the first half of 2023, West Midlands Combined Authority (WMCA) and its Constituent Authorities and Universities have worked with government to design a programme of energy efficiency audits and Capital Grants covering the West Midlands International Territorial Level (ITL) 1 region. The scheme was developed in response to concerns that the West Midlands contains a relatively high proportion of energy intensive businesses (notably manufacturers) and that rising energy costs was a major threat to the long-term competitiveness of a significant number of businesses and could put jobs at risk. The West Midlands Industrial Energy Taskforce, which was charged with exploring this issue, concluded that a more in-depth business support and finance programme was required to complement the Decarbonisation Net Zero Programme that is being funded through UK Shared Prosperity Fund (UKSPF), which Coventry City Council is delivering for Coventry businesses, which was agreed by CCC Cabinet in February 2023.

In total, government has allocated £24.6m to the West Midlands ITL1 region, with the region needing to deliver energy efficiency audits to 4,000 businesses by March 2025, and awarded Capital Grants of up to £100,000 to support some of these businesses to tackle financial barriers to implementing capital investments to improve energy efficiency. The expectation is that the activities will improve energy consumption by reducing energy bills and therefore improve productivity, reduce carbon emissions, and will both protect good quality jobs and create new skilled jobs.

Given the size of the geographical area being targeted, a consortium of Delivery Partners has been developed. Coventry has been included within the WMCA delivery area, and similar to the UKSPF Decarbonisation Net Zero Programme delivery arrangements, Coventry City Council (CCC) has been selected to deliver Energy Audits for Coventry businesses as part of a consortium led by Aston University. In addition, Coventry City Council has been selected to administer the Capital Grants fund for Coventry businesses, as part of a consortium led by Birmingham City Council.

The BEAS programme is initially being delivered in the West Midlands as a national Pilot up to March 2025. It is, at the time of writing, not clear what government's plans are for the programme beyond March 2025.

The total BEAS funding currently allocated to Coventry City Council amounts to £1,689,679.00 up to March 2025. It includes £346,000.00 to deliver 277 Energy Audits to Coventry businesses, plus £1,343,679.00 to deliver grants of up to £100k to Coventry businesses and associated programme management and grant administration costs. Out of such totals, CCC's revenue for Project Management and Grant Administration staff will be £9,700.00 until March 2024 and then £192,000.00 to fund staff from April 2024-March 2025. It should be noted that the funding for Coventry, which is part of the WMCA area allocation, is indicative and the value could change depending on levels of demand and take-up from the other Constituent Authority areas.

To account for potential high levels of demand from Coventry businesses and the fact that potential underspend at regional level for other LAs, could mean further Grant funds for Coventry, the report also requests authority to accept further grant allocation **up to the total sum of £2.5m** of BEAS funding to deliver Energy Audits, and for delegated authority to enter into funding agreements.

Delegated authority is also sought to contract with Lead Delivery Partners in order to complete this work.

Recommendations:

Cabinet is recommended to:

- 1) Approve the acceptance of BEAS funding £1,689,679 for delivery and management of Energy Audits and any further allocation up to and including grants up to a maximum of £2.5m.
- 2) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Chief Operating Officer and the Chief Legal Officer and following consultation with the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation, including the authority to establish and implement the grant scheme necessary to deliver the BEAS.
- 3) Grant delegated authority to the Director for Business, Investment and Culture, following consultation with the Chief Operating Officer and the Chief Legal Officer and following consultation with the relevant Cabinet Member(s), to enter into back-to-back contracts with the Lead Delivery Partners – Aston University for Energy Audits and Birmingham City Council for Capital Grants and any other external providers that may be required to deliver some activities, as deemed necessary.

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?

No

Report title: Business Energy Advice Service (BEAS)

1. Context (or background)

- 1.1. During the first half of 2023, WMCA, its Constituent Authorities and the region's universities has worked with the UK government to design a programme of Energy Efficiency Audits and Capital Grants (i.e. the BEAS programme) that would support West Midlands businesses to tackle challenges associated with rising energy costs, and thereby improve levels of energy efficiency, reduce carbon emissions, and tackle rising energy costs in order to safeguard long-term competitiveness, improve productivity, protect jobs and create new jobs.
- 1.2. The BEAS programme was designed in response to concerns emerging from the West Midlands Industrial Energy Taskforce. This was a private sector led Group, consisting of key Business Bodies and Sector Groups, and was set up by the Mayor of the West Midlands to identify the scale of risks to the region's businesses of rising energy costs from early 2022 onwards. One of the key drivers was that the West Midlands has a proportionately high concentration of energy intensive businesses, particularly in the manufacturing sector, and the Taskforce established that without interventions, the competitiveness of a high number of businesses and potentially jobs were at risk.
- 1.3. The interim findings of the Taskforce's work were presented to representatives of the WMCA, region's Local Authorities and Universities to help inform considerations for the design of future appropriate business support programmes, with the final report published in July 2023. One of the key conclusions of the Taskforce was that although WMCA had directed some of its UKSPF allocation to the Decarbonisation Net Zero Programme, more in-depth interventions were required to tackle the escalating challenges in the area of energy efficiency and net zero and improving energy management (going beyond just the energy efficiency of business premises), including specific interventions to support the most energy intensive businesses. The Taskforce Report also recommended that lessons from additional support measures delivered in the West Midlands should then also be applied nationally.
- 1.4. As a result, the BEAS programme of Energy Audits (4,000 in total, with more in-depth audits for the most energy intensive businesses) and Capital Grants of up to £100k was established to cover the ITL1 West Midlands region. The West Midlands has been selected as the region to pilot a national programme, with £24.6m of funding allocated to the region from the Department for Energy Security & Net Zero (DESNZ) and Department for Levelling Up, Housing & Communities (DLUHC) in August 2023.
- 1.5. The WMCA will be the Accountable Body for the overall programme, Delivery will be across the ITL1 geography of the West Midlands (reflecting the same geographical scale of delivery as the Made Smarter West Midlands programme), although the majority of the delivery (and all of the DLUHC funded aspect) will be within the WMCA area. The programme is aligned to the WMCA Decarbonisation Net Zero programme (funded through UKSPF), and similar programmes across Worcestershire and the Marches, Warwickshire, and Staffordshire. Of the £24.6m, £9.1m has been allocated to delivering Energy Audits and £15.5m to Capital Grants (£10.5m of which will be to the WMCA area).

- 1.6. Because of the scale of delivery, it has assigned lead bodies to be Lead Delivery Partner in each sub-region, who will contract directly with WMCA. In some cases, the Lead Delivery Partners have sub-contracted delivery of the services given the scale of activities required.
- 1.7. Within the WMCA area, given the size of the business population in the WMCA area, a pool of providers has been established for both the audits and grants. They will be sub-contracted by the Lead Delivery Partners assigned by WMCA, who are Aston University for the Energy Audits and Birmingham City Council for the Capital Grants (BCC received Cabinet approval in October 2023 for the management of the Grant element of the BEAS Pilot Project). In other parts of the ITL1 region, the relevant County Councils have been assigned as Lead Delivery Partner, but some have sub-contracted elements of delivery to other organisations.
- 1.8. **Energy Audits.** Aston University (assigned as Lead Delivery Partner for the Energy Audits in the WMCA area) will sub-contract Coventry City Council to deliver Energy Audits to Coventry businesses, building on CCC's role in delivering the UKSPF-funded Decarbonisation Net Zero Programme in Coventry and previous delivery of the Coventry & Warwickshire Green Business Programme. CCC will be awarded £346,000 to deliver 277 audits, which will support businesses across a wide range of sectors in quantifying and benchmarking their emissions (audits of the energy used by their buildings, industrial processes and operations), identify cost-effective energy saving measures, set validated emissions targets and embed low carbon strategy within the company. CCC will therefore need to submit claims and required evidence for the Audits to Aston University and will receive payments following the acceptance of claims.
- 1.9. **Capital Grants.** Birmingham City Council (assigned as Lead Delivery Partner for Capital Grants in the WMCA area) will subcontract CCC to deliver and administer Capital Grants of up to £100,000 for Coventry businesses through this Fund. CCC will be awarded a total of £1,343,679 to deliver and manage the grants. The grants will subsidise business investment in reducing energy demand. Grants will be for the energy efficient replacement and/or upgrade to existing industrial or commercial processes or buildings. CCC will therefore need to submit claims and required evidence for the Capital Grants to Birmingham City Council and will receive payments following the acceptance of claims.
- 1.10. It should be noted that funding allocations within the WMCA area are indicative. We have therefore made provisions within this paper to take on additional grant funding if the need and demand for the Capital Grants and/or Energy Audits from Coventry businesses proved to be high and/or demand from other parts of the region proved to be lower than first expected and a reallocation of the remaining funds is implemented within the WMCA area.

2. Options considered and recommended proposal

- 2.1. The Council could have chosen to decline the opportunity to act as the delivery body for any BEAS activities 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 other third-party providers to deliver the activities. 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 delivering support to businesses in the areas of energy and resource efficiency and net zero, not least through the successful Coventry & Warwickshire Green Business Programme, which was funded through European Regional Development Fund (ERDF) up to June 2023. The Council acted as lead partner for this programme, and if it did not take on this role there is a risk that the overall offer for local residents would be much poorer.

- 2.2. A second option could have been for the Council to only deliver one of either the BEAS Energy Audits or Capital Grants, and to leave WMCA to appoint a third party to deliver the other activity. This option was discounted because one of the key success factors behind the Council's previous business support delivery in this subject area has been the ability to deliver an integrated service of grants following Energy Audits and other non-financial support that have identified where businesses most need intervention. A further challenge is that different organisations delivering the Energy Audits and Capital Grants would have delivered less clear messages for Coventry businesses and a less coherent customer journey.
- 2.3. The recommended option is for Coventry City Council to act as the delivery body for Energy Audits and Capital Grants in Coventry, sub-contracted by the Lead Bodies of Aston University and Birmingham City Council respectively. This will allow the Council to continue delivering its high-quality in-house service in energy and resource efficiency and net zero to Coventry businesses and integrated model of grant and non-financial support to Coventry businesses. The preferred option is for Coventry City Council to continue building on the successes and service delivery methods that worked so well in previous delivery of Coventry & Warwickshire Green Business Programme in particular.

3. Results of consultation undertaken

- 3.1. Securing BEAS funding and delivery will support the aims of the Council's Economic Development Strategy, which was approved by 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 continues to consult with its partner organisations to define the details of business support activities in Coventry on an ongoing basis. This includes (but not limited to) Coventry and Warwickshire Growth Hub, Coventry and Warwickshire Chamber of Commerce, Coventry University, University of Warwick and the Federation of Small Businesses. Through this, we will seek to ensure that the business support services and programmes delivered by different organisations are interlinked and are meeting local business needs and opportunities.

4. Timetable for implementing this decision

- 4.1. The current BEAS programme makes funding available during the financial years 2023/24 and 2024/25. With the funding due to end in March 2025 and delivery timescales running concurrently with UKSPF-funded business support activities, we will work with local partners to ensure the pipeline of potential beneficiaries grows rapidly in order that the targets for number of audits delivered and grants paid to businesses can be achieved.

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

5.1. Financial Implications

The report seeks authority to accept an initial allocation £1,689,679 and any further allocation up to and including o £2.5m of external BEAS grant for the purposes set out in section 1 of the report. This is the indicative allocation for Coventry for the delivery of Energy Audits and Capital Grants, plus enough flexibility to accept additional funds if Coventry's indicative allocation for Capital Grants and/or Energy Audits were to change due to high demand.

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 Service. 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, and some of the funding will support the management and administration of the Capital Grants at £201,552 of the overall allocation. The Economic Development Service budgets are set up to accept and manage funding from the grant regimes they deliver.

The WMCA is the nominated Accountable Body for BEAS, however they will award monies to the Lead Bodies of Aston University and Birmingham City Council through formal legal Grant Aid Agreements. In awarding monies to the City Council, Aston University and Birmingham City Council will pass delivery risk to the City Council through formal legal Back-to-Back 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 BEAS 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 provide is consistent with key principles and will be required to publish information about any subsidies provided.

CCC Law and Governance Service will work with the delivery teams to ensure that any support provided to businesses or delivery partners is compliant with these rules.

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

6. Other implications

6.1. How will this contribute to the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

Securing BEAS funding and delivering the Energy Audits and Capital Grants 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 provide a stronger platform for growth and boost their longer-term competitiveness. It will also raise the profile of Coventry as a leader in "green innovation". The activities will also be expected help to "Tackle the Causes and Consequences of Climate Change".

Finally, securing the BEAS funding, and acting as deliverer for both the Energy Audits and Capital Grants, will contribute to the Council's aim to act as leader and enabler for the city, ensuring that through our relationship with WMCA and other organisations delivering business support in the area net zero in the West Midlands (notably Aston University), the very best outcomes are achieved for our businesses and residents as jobs are safeguarded.

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 business support delivery and programme management teams in the Economic Development 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 securing the BEAS funding for these activities will provide funding crucial to retaining highly skilled staff currently working on projects which are due to come to 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 which are being funded by UKSPF and BEAS has been prepared. The Equalities Impact Assessment has considered this impact for both Coventry's business base and our communities. It has considered 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, which has informed the approach to this work.

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

If we secure approval to accept the BEAS funding, the Energy Audits and Capital Grants will continue the work of the Coventry and Warwickshire Green Business Programme and formative work of the UKSPF-funded Decarbonisation Net Zero 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. The Audits could also provide businesses with a route to improving green skills, and businesses will be referred to local skills support, where appropriate.

6.6. Implications for partner organisations?

We will be working closely with key partners operating at a regional level in Aston University in the area of delivering Energy Audits and Birmingham City Council in managing grant funds. We will also continue to work closely with key local business support partners (including but not limited to Coventry & Warwickshire Growth Hub, Coventry & Warwickshire Chamber of Commerce, Coventry University and WMG), as we expect to receive a number of cross-referrals from these organisations of local businesses that could benefit from the services. As such, we will work closely with these organisations to market the BEAS programme and maximise levels of awareness of the services amongst the local business base and how they can deliver benefits for local businesses.

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Public report

Cabinet

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

13 February 2024
19 March 2024

Name of Cabinet Member:

Cabinet Member for Jobs, Regeneration and Climate Change - Councillor J O'Boyle
Cabinet Member for Strategic Finance and Resources – Councillor R Brown
Cabinet Member for Housing and Communities – Councillor D Welsh

Director approving submission of the report:

Director of Property Services and Development
Chief Operating Officer (Section 151 Officer)

Ward(s) affected:

St. Michael's

Title:

City Centre South Additional Grant Funding

Is this a key decision?

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

Executive summary:

City Centre South (CCS) will deliver transformational improvements to Coventry city centre through the creation of a new residential led community providing new homes, jobs, commercial and leisure opportunities and high-quality public spaces.

The Council's development partner, Shearer Property Regen Ltd (SPRL), led by Hill Developments are continuing to move the scheme forward and have made considerable progress since being appointed as the funding partner under the terms of the Development Agreement between the Council, SPRL and Shearer Property Group (SPG).

This report seeks formal approval to the next stage of the project following the previous Council Decisions in December 2022 which approved the provision of Council funding to the scheme.

Since the recommendations contained within the December 2022 report were approved, a significant amount of work has been undertaken to progress the scheme, including the Compulsory Purchase Order (CPO) being confirmed by the Secretary of State, the delivery of high-quality new premises for the Shopmobility scheme and a significant amount of ground investigations and surveys being undertaken. However, changes in fire safety regulations proposed earlier this year in the wake of the Grenfell disaster have required changes to the design of, and timescales for, the scheme resulting in viability challenges which need to be resolved before the scheme can commence further.

These changes announced by Michael Gove, Secretary of State for Levelling Up, Communities & Housing, in July 2023 will require all residential buildings over 18m in height to incorporate dual stair cores and additional fire-fighting lifts to improve means of escape and building safety in the event of fire. This change was not anticipated at the time the previous report was considered.

This change in regulation has had a significant, adverse effect on scheme viability due to increasing build costs and reduced sales/lettable area, thus depressing overall scheme viability. In order to address this issue and to prevent the scheme from stalling the Council has been able to successfully negotiate an additional grant assistance from the West Midlands Combined Authority (WMCA) of up to £12.24m ("Additional WMCA Funding") in addition to the £98.8 million pounds already provided.

This report, therefore, requests authority to accept the Additional WMCA Funding and to request delegated authority to amend the Development Agreement with SPRL and Grant Agreements with WMCA in order to be able to apply this funding towards the delivery of the scheme.

Recommendations:

Cabinet is asked to recommend that Council:

- 1) Approve the acceptance of the Additional WMCA Funding of up to £12.24m to be added to the £98.8m previously secured which will be utilised to facilitate the delivery of City Centre South.
- 2) Delegate authority to the Director of Property Services and Development, following consultation with the Chief Operating Officer (Section 151 Officer), the Chief Legal Officer, the Cabinet Member for Jobs, Regeneration and Climate Change, the Cabinet Member for Strategic Finance and Resources and the Cabinet Member for Housing and Communities, to undertake the necessary due diligence and approve and enter into the legal agreements and undertakings necessary to give effect to recommendation 1) above.
- 3) Add the Additional WMCA Funding to the Council's 5 Year Capital Programme.

Council is recommended to:

- 1) Approve the acceptance of the Additional WMCA Funding of up to £12.24m to be added to the £98.8m previously secured which will be utilised to facilitate the delivery of City Centre South.
- 2) Delegate authority to the Director of Property Services and Development, following consultation with the Chief Operating Officer (Section 151 Officer), the Chief Legal Officer, the Cabinet Member for Jobs, Regeneration and Climate Change, the Cabinet Member for Strategic Finance and Resources and the Cabinet Member for Housing and Communities, to undertake the necessary due diligence and approve and enter into the legal agreements and undertakings necessary to give effect to recommendation 1) above.
- 3) Add the Additional WMCA Funding to the Council's 5 Year Capital Programme.

List of Appendices included:

The following appendices are attached in the private element of this report:

- Deloitte Review of Additional Funding Request Report

Background papers:

None

Other useful documents

Report to Cabinet and Council 24th January 2017 "City Centre South Development"

Report to Cabinet 28th November 2017 and Council 5th December 2017 "City Centre South –Early Acquisition of Aviva Long Leasehold Property Interests"

Report to Cabinet 11th January 2022 "City Centre South Land Acquisition and Compulsory Purchase Order"

Report to Cabinet 15 November 2022 and Council 6 December 2022 "City Centre South Funding and Delivery"

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 - 19 March 2024

Report title: City Centre South Additional Grant Funding

1. Context (or background)

- 1.1 The proposal to redevelop the City Centre South (CCS) site (“the Scheme”) is the Council’s key regeneration priority for the city centre.
- 1.2 Shearer Property Regen Ltd (SPRL) are the Council’s development partners for the Scheme and they were appointed by the Council in 2017 following a competitive procurement process to take forward development proposals for the site. SPRL have appointed Hill Holdings Limited as the Approved Funder for the scheme and Hill are also investing equity to become a shareholder in the SPRL development vehicle the Council is in partnership with.
- 1.3 The Scheme benefits from £98.8m of grant funding from the West Midlands Combined Authority (WMCA) which was secured by the Council (also in 2017) to fund land acquisition, enabling works, demolition and other key development costs necessary to bring forward the Scheme.
- 1.4 Whilst CCS has always been envisaged as a mixed use, city centre scheme, the original proposals included a significant amount of retail space anchored by a department store. Clearly, the changes to both the high street and the wider economy have influenced the Council and SPRL to re-envisage the scheme and bring forward proposals for more residential development as part of a deliverable, mixed use city centre development scheme.

This has resulted in:

- Planning Committee granting outline planning permission for the residential led Scheme in January 2022
- Hill (through Hill Holdings Limited) being confirmed as Approved Funder for the scheme in March 2022 and then subsequently investing into SPRL (through Hill Residential Ltd)
- The Compulsory Purchase Order (CPO) for the Scheme being made in April 2022
- WMCA Investment Board approving changes to the grant funding to pivot the scheme from a predominantly retail scheme to one which is predominantly residential in October 2022.
- A Minor Material Amendment (S73) Planning Application submitted to the Council in November 2022 to reflect the Scheme refinements.
- In December 2022, Council agreed to approve the use of up to £32.75m to support the delivery of the Scheme (£28.7m of which is to be funded from the West Midlands Combined Authority City Centre South grant and £5.25m from Capital receipts)

- A CPO Public Inquiry taking place in January 2023 following which the Secretary of State confirmed the CPO in April 2023
- A further Minor Material Amendment (S73) Planning Application submitted to the Council in October 2023 (and approved in December 2023) to reflect the Scheme changes required to comply with the dual core requirements referenced below.
- The Discharge of Reserved Matters Planning Application (RMA) for phase one of the scheme was submitted in December 2023.

1.5 The Scheme will deliver a range of transformational benefits for the people of Coventry. The proposed refinements to the Scheme will lead to up to 1,575 new homes (of which 20% will be affordable, predominantly social rented units), new retail, employment, health care and leisure space resulting in a new sustainable city centre community whilst still retaining a mixed-use approach. As well as these quantitative benefits, the delivery of the Scheme will realise a significant number of qualitative benefits that will benefit local residents and businesses, which include:

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

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

- 1.8 The financial re-appraisal of the refined Scheme undertaken at the time of the December 2022 report indicated that even after a full utilisation of those elements of the WMCA grant available to the developer a viability gap remained. Accordingly, the Council agreed to provide a contribution of up to £32.75m of funding to help facilitate delivery of the Scheme. The proposed Council funding of the Scheme includes utilisation of £28.7m of the WMCA grant which is awarded to the Council as compensation for its loss of existing land interests in the CCS area and which the Council is willing to see recycled into supporting Scheme delivery.
- 1.9 Our advisers, led by Deloitte, advised the Council that an additional funding contribution from the Council to close the Viability Gap was justified and required in order to deliver the Scheme.
- 1.10 However, subsequently in July 2023, Michael Gove, Secretary of State for Levelling Up, Communities & Housing announced that all residential buildings over 18m in height will be required to incorporate dual stair cores and additional fire-fighting lifts and emergency systems to improve means of escape and building safety in the event of fire. This change was not anticipated at the time the previous report was considered.
- 1.11 The consequences of these late changes to the scheme have been considerable. The overall design of the scheme has been modified to allow the incorporation of additional staircases, protected core and fire-fighting lifts. These changes both increase the cost of constructing the scheme and reduce the amount of liveable area available to sell or rent. SPRL have estimated significant additional costs to the scheme as a result (the figure is available in the Private version of the report).
- 1.12 The Council is not in a position to contribute additional funds to the scheme. Accordingly, an approach was made to the WMCA who have agreed to provide an additional £12.24m of funding to allow the project to proceed. This additional funding was approved by the WMCA Investment Board on the 15 January 2024.
- 1.13 Once again the Council has requested that Deloitte provide a written report confirming the justification for the additional funding and demonstrating that value for money for the public purse is being secured. This report has been shared with the WMCA to support the request for additional funding and is included within the Private version of the report.

2. Options considered and recommended proposal

- 2.1 Option 1. Reject the additional funding request from SPRL and funding support from the WMCA
- 2.1.1 SPRL raised a formal Viability Amount request on 26 October 2022, which under the terms of the DA, the Council had a requirement to consider. This informed the decision of the Council to commit £32.75m in December 2022. There is no further formal requirement for the Council to consider an additional funding request from SPRL. However, if the Council formally resolves not to agree to accept this additional funding, then there is a real risk that the scheme may not proceed or proceeds in a fundamentally different form following a lengthy delay.

- 2.1.2 Whilst the Council and SPRL are obligated to collaborate with one another to assess if there might be an alternative solution, any such solution, if one were to emerge, would undoubtedly require the scheme to be re-designed and reduced in scope and quality. Many of the benefits that the scheme is due to deliver could be put at risk.
- 2.1.3 This is not the recommended option, and it should be recognised that this option would come with its own challenges, constraints and risks.
- 2.2 Option 2. To approve the Recommendations set out above and agree additional funding into the Scheme.
- 2.2.1 CCS is the Council's key regeneration priority for the city. The Council has worked closely with its development partner and the WMCA for a number of years to bring this complex scheme forward and deliver the much-needed benefits it will bring.
- 2.2.2 The Council and its advisors are satisfied that the additional funding that SPRL have requested is required to bring the Scheme forward. If this option is approved, it will help to provide the best possible opportunity for the Scheme to come forward and to help meet the Council's economic development, regeneration and well-being objectives for Coventry.
- 2.2.3 The decision to agree to accept the additional funding for the Scheme provides the opportunity for the key benefits for Coventry as set out in section 2.3 below to be delivered as part of the Scheme:
- 2.3 Key benefits for the city
- 2.3.1 **Regeneration:** The Scheme is at the heart of the city's regeneration ambitions. CCS will transform six and a half hectares of the city centre making it work for the way people want to use and enjoy city centres today. With up to 1,575 new homes the refined Scheme will help to create a new community in the city centre alongside all the benefits that brings. Recent investment in the public realm has shown how spaces can be transformed with high quality materials, water features and art. These important factors will also be at the heart of CCS and we expect lots of new jobs to be created. The Scheme will also fit with our wider ambitions for the Friargate area of the city which is only five minutes' walk away.
- 2.3.2 The Scheme will also play an important role in delivering a key objective for the city, namely the provision of a range of housing options, including affordable housing, which will help to create thriving, vibrant and diverse communities. This includes the retention of graduates and the role they play in attracting high value businesses. A young talented pool of labour is one of the most important considerations for businesses when deciding to relocate. CCS will play an important role if Coventry is to achieve its wider economic goals. With a significantly improved city centre, Coventry can expect to retain more graduates and attract more high value businesses – helping to close the City's productivity gap.

- 2.3.3 **New homes:** The refined Scheme is anticipated to provide up to 1,575 new homes in the city centre. As well as making a positive contribution to local housing supply, the new homes built on existing brownfield land will help make the city centre a location of choice for new and existing residents of Coventry.
- 2.3.4 **Enhancing the city's reputation and offer:** Alongside the Friargate scheme and the works to transform the rail station, the delivery of the Scheme will help to provide market confidence that Coventry should be a destination of choice for business investment.
- 2.3.5 The Scheme will support the diversification of the city centre's residential, retail, leisure, and community offer to attract increased footfall throughout the daytime and into the evening, supporting the viability of businesses within City Centre South and the wider city centre.
- 2.3.6 **Health and well-being:** The Scheme will deliver a larger area of public realm of a higher quality, providing a significant amount of public open space for residents and visitors to socialise, relax and dwell, supporting improved health and wellbeing. There will also be significant improvements to the permeability and legibility of this key city centre location through enhancing the historically important north-south connectivity along Hertford Street and Market Way, as well as creating new east-west connectivity which will improve the community's use of this part of the city.
- 2.3.7 **Environmental:** The Scheme will bring underutilised land in a city centre location back into productive use, maximising the use of brownfield land in a way which will enhance the quality of the built environment to the benefit of existing and new residents in Coventry.
- 2.3.8 The Scheme will also realise large improvements to the quality of the built environment, through the removal of poor-quality buildings and the replacement of the current public realm with new, high quality public spaces as well as an enhanced setting for the Grade II listed Coventry Market, making the building more prominent at ground floor level and enabling its architectural and communal values to be experienced in a more open manner.
- 2.3.9 The Scheme will also encourage sustainable modes of travel by removing surplus car parking capacity in the city centre and there is the potential for biodiversity net gain, through the creation of new planting, green and brown roofs at detailed design stage.
- 2.3.10 This is the recommended option.

3. Results of consultation undertaken

- 3.1 Ahead of the Scheme's Outline Planning Application submission, SPRL carried out a public consultation exercise between June – July 2020 which focused on understanding the community's and stakeholders' views on the vision and themes of the proposed scheme. Due to the COVID-19 pandemic and related restrictions, the consultation was primarily digital, with paper copies of information sent where requested. Eight webinars were held for stakeholders and local people.

- 3.2 The consultation was promoted in local press via adverts and press releases, through the Council and SPRL's websites and social media and through direct messaging to stakeholders and local groups.
- 3.3 A total of 2,700 people visited the consultation webpage and 281 online feedback forms were completed with additional feedback received via the Freepost address provided.
- 3.4 From the feedback received, 62% of people strongly agreed or agreed with the City Centre South vision. Respondents were keen to see the indoor market and the post war masterplan protected. There was clear support for green and open space and a desire for support for cultural and minority groups as part of the plan. 88% of respondents either strongly agreed or agreed that they would like to see improved pedestrian links and public spaces in this part of the city centre. 66% indicated that they liked the use of materials and outline design principles shown in the images provided. There was also support for the community uses. Throughout the feedback there was a clear desire to see something different or special added to ensure Coventry has a USP that celebrates its thriving art scene and heritage. This feedback has informed the development of the Scheme and will continue to inform final detailed designs going forwards.
- 3.5 There has been, and will be, further engagement in relation to the Scheme refinements as part of the evolution of the scheme in planning terms, including the reserved matters applications. There is also engagement and dialogue taking place with Shopmobility and relevant stakeholders and user groups in relation to the relocation of the Shopmobility service (the relocation is a pre-commencement condition attached to the Outline Planning Permission).

4. Timetable for implementing this decision

- 4.1 If Cabinet and Council agree to the Recommendations set out in this report then it is anticipated that the relevant legal agreements relating to funding and the Development Agreement will be agreed in early 2024. Subject to a positive outcome to the Reserved Matters Application submitted in December 2023, it is anticipated that the developer will be able to commence demolition during 2024.

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

5.1. Financial Implications

- 5.1.1 In 2022 a revised Full Business Case was submitted to the WMCA. This approved the proposed use of the £98.8m grant that was originally awarded in 2017 to support the scheme. In addition to this, a further £4m was approved by Full Council to provide gap funding for the project (plus approval to recycle £28.7m of WMCA Grant into the scheme).

- 5.1.2 Following changes to building regulations and the subsequent gap caused from the increased cost and reduced income referred to in section 1.11 of this report, the WMCA have agreed to provide up to £12.24m funding to contribute to this gap. It has been made clear that the Council is not in a position to provide further funding to the project above the £4m already approved. Further information on the revised cost and funding of the scheme is contained in the Private version of the report.
- 5.1.3 This report seeks authority to accept the additional £12.24m grant funding from the WMCA in order to contribute to the viability of the scheme. It does not seek any additional resource from the Council.

5.2. Legal Implications

- 5.2.1 The legal power for the Council to accept, administer the Additional WMCA Funding is provided by the general power of competence contained in Section 1 of the Localism Act 2011.
- 5.2.2 In order to accept the Additional WMCA Funding and ensure that this is properly applied towards the delivery of City Centre South, it will be necessary to amend both the Development Agreement between SPRL and CCC and the Grant Aid Agreement between CCC and WMCA.

UK Subsidy Control

- 5.2.3 Prior to entering into final legal agreements, the Council will need to satisfy itself that the grant is being spent against appropriate items and only to the extent required to facilitate delivery of the scheme. As such, it will be necessary for the Council to demonstrate that certain principles set out in the Subsidy Control Act 2022 will be satisfied. Put broadly for this project, there are some applicable subsidy control exemptions and other principles which apply which include that a subsidy pursues a legitimate policy objective (either to meet a market failure or to advantage an equity rationale), is proportionate to meeting that objective which would not otherwise be achieved and generates positive benefits that outweigh any distortion of competition and Investment incentives that may arise from it.
- 5.2.4 The overage arrangements which is to be included in the amended development agreement and the fact that the Additional WMCA Funding will only be permitted to be drawn down in arrears against agreed pre-specified works and will be subject to sign off by an Employer's Agent (or equivalent) will assist in this regard. In addition, the Developer will be responsible for providing the Council with all necessary reports to demonstrate that monies is being properly utilised; and the Developer will indemnify the Council against any claims or breaches arising from misuse of the grant. The final updated Development Agreement package will be reviewed and appropriate legal advice obtained prior to entering into it.

Procurement

- 5.2.5 Prior to entering into final legal agreements, the Council will need to satisfy itself that it continues to satisfy procurement requirements. Appropriate legal advice will be obtained.

6. Other implications

6.1. How will this contribute to the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

- 6.1.1 The delivery of the proposal outlined in this report will help deliver a range of housing, economic development, regeneration and wellbeing objectives that will help to realise the Council's strategic ambitions for a more vibrant and economically prosperous city.

6.2. How is risk being managed?

- 6.2.1 The Council has taken a proactive and positive approach to the identification, management and mitigation of risk associated with the project at both a strategic and project level. A dedicated risk register has been created, focussing on the risks that could impact the overall delivery of the project and this is managed by the project team responsible for bringing forward the Scheme.

6.3. What is the impact on the organisation?

- 6.3.1 The impact to the organisation will be considerable in terms of staff resources. A significant number of officers from across the Property and Development, Planning, Finance and Legal Services divisions are responsible for a range of work streams associated with this project, including: land assembly, CPO, scheme design, Planning processes and Decisions, legal agreements, financial analysis and agreements, commercial negotiations and community and business engagement.

6.4. Equalities / EIA?

- 6.4.1 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
- 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.

- 6.4.2 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;
- 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.

6.4.3 An EqlA in relation to the land assembly and CPO elements of the Scheme was prepared and considered by Cabinet on the 11th January 2022 and updated in March 2022. The EqlA is an iterative and live document and is reviewed on a regular basis.

6.4.4 A separate EqlA has been prepared in relation to the relocation of Shopmobility (which is a Pre-commencement Planning Condition). The relocation of Shopmobility is being led by the Council and the developer following engagement and dialogue with key stakeholders and affected user groups.

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

6.5.1 The overall development will be in accordance with the Council's planning policies for sustainable development.

6.6. Implications for partner organisations?

6.6.1 There are implications for the Council's development partner for the Scheme, SPRL, that will result from the Decisions that are the subject of this report.

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Councillor R Brown	Cabinet Member for Strategic Finance and Resources	-	19/01/2024	22/01/2024
Councillor D Welsh	Cabinet Member for Housing and Communities	-	19/01/2024	22/01/2024

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